

CODE OF CONDUCT

In order to ensure responsible corporate governance in the areas of basic human rights, labor standards, environmental management and anti-corruption in the workplace, SoftwareONE's Code of Conduct was established in January 2013 and revised in April 2019.

PURPOSE

SoftwareONE is committed to operating its business as an ethical company, with integrity and as a good corporate citizen.

In addition to respecting all relevant laws, regulations and standards in all of the countries in which SoftwareONE operates, all SoftwareONE units, companies and employees shall comply with this Code of Conduct even if it stipulates a higher standard than required by national laws or regulations. Where local laws and regulations require higher standards, such higher standards will be respected.

The SoftwareONE Code of Conduct is not exhaustive. The guiding principle is that we conduct ourselves as loyal, flexible, motivated, open individuals who accept responsibility for our own actions and always behave ethically, with integrity and as good citizens.

1 Labor Standards

We support and respect the protection of internationally proclaimed human rights. We make sure that we are not complicit in human rights abuses. As far as any relevant laws allow, all employees are free to form and to join or not to join trade unions or similar external representative organizations and to bargain collectively. Forced, bonded or compulsory labor is not used and employees are free to leave their employment after reasonable notice as required by national law or contract. No person is employed who is below the minimum legal age for employment.

2 Discrimination and Harassment

SoftwareONE is an equal opportunities employer and is committed to complying with all applicable laws and regulations relating to equal employment opportunity, non-discrimination and similar employee-related matters. All employees are treated with respect and dignity at all times, in line with the Company values. SoftwareONE operates a zero tolerance policy on harassment and discrimination of any kind. This includes but is not limited to physical or verbal abuse, physical or sexual harassment (in any form, including the distribution of sexual material), any other unlawful harassment or any threats or other forms of intimidation – all of which are prohibited and will not be tolerated. All kinds of discrimination based on partiality or prejudice are prohibited, including discrimination based on race, sex, color, ethnicity, sexual orientation, disability, age, marital status, parental status, pregnancy, religion, political opinion, nationality, social status, and any other characteristic protected by local law as applicable.

As an employee you have a personal responsibility to help eliminate actions or circumstances which undermine this policy, and you are encouraged to report any

violation of this policy to your supervisors, to Compliance or to the external independent reporting hotline as per section 17 below.

3 Use of our Physical Assets

Each of us is responsible for protecting the assets of SoftwareONE. IT-resources such as laptops (including IT services like Internet and email), telephones, photocopiers and similar technologies are provided to enable you to perform your work in support of the SoftwareONE business. All electronic data stored on SoftwareONE computers or similar assets are the property of SoftwareONE. In order to ensure compliance, SoftwareONE monitors and records IT systems like business e-mails [and the use of the internet] regularly to the extent permitted by law (in this regard, please refer to our IT Enduser-Policy).

4 Anti-Corruption

No form of extortion and bribery, including improper offers for payments to or from, or improper entertainment of employees or organizations is tolerated. It is forbidden to bribe office holders, clients, business partners, suppliers, or any other person, to accept improper payments from such persons or to incite these persons to such behavior in order to achieve unfair advantages. Office holders or government officials are employees of state-owned or state-controlled organizations, entities or businesses. This term is very broad and includes officials and employees of all branches of government, including local and regional authorities, judges, customs, police forces, political parties, public international organizations and family members of such officials. Please note that already the making or accepting of a promise for improper payments is deemed to be corrupt behaviour, even if no payment is made in the end. Improper entertainment is also a form of bribing. In case doubts arise already prior to a meeting or event, ensure not to attend the meeting or event on your own but to bring along a fellow employee or your supervisor as a witness.

5 Payments, Benefits and Gifts to or made by SoftwareONE Employees

All business decisions made by SoftwareONE employees should be made in accordance with this Code of Conduct, in the best interest of the Company, and without regard to any personal interests that may be inconsistent with the interests of the Company.

Any payment, benefit, gift or contribution received by SoftwareONE personnel from any current or prospective SoftwareONE customer, supplier, business partner or a third party or organization related to any of the above must not only comply with applicable law but must also be consistent with ethical business and local cultural practices and

must not be intended to improperly influence, or appear to improperly influence, business decisions. Equally, any payment in kind, benefit, gift or contribution made by SoftwareONE personnel to any current or prospective SoftwareONE customer, supplier, business partner, or to a third party, an organization or political party related to any of the above, must also comply with applicable law, be consistent with ethical business and local cultural practices and must not be intended to improperly influence or appear to improperly influence business decisions.

As a guideline, a gift or benefit made or received of a value, or entertainment in the amount (per person) of up to, CHF 100 may be acceptable; it is your sole responsibility to make a judgement taking into account all circumstances. A gift or benefit received or made in a value exceeding CHF 100 must be preapproved in writing by your supervisor, using the SoftwareONE Preapprovals Form. Any gift or benefit received or made in a value exceeding CHF 200 must, in addition, be preapproved in writing by the Compliance Department at compliance.global@softwareone.com, using the SoftwareONE Preapprovals Form. If, at the sole discretion of the Compliance Department, such gift or benefit is deemed unacceptable or inappropriate, it shall not be approved. The decision of the Compliance Department is final. In case a gift or benefit offered to SoftwareONE personnel is considered unacceptable or inappropriate, and rejection is not (or no longer) possible, such gift or benefit shall become the property of SoftwareONE and may be donated to a charitable organization.

Payments are never made in cash, notwithstanding their amount. If you are uncertain as to whether a payment, benefit or gift would violate this policy, you should consult with your supervisor or with the Group Compliance Officer to be certain that such payment, benefit, gift or contribution is appropriate and lawful under the circumstances before accepting or making it.

6 The Environment

Endeavour to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures, e.g. by recycling, re-using, or substituting materials.

7 Privacy and Data Protection

Each of us, our customers, suppliers, dealers and others that interact with SoftwareONE have legitimate expectations that SoftwareONE will handle personal information in strict confidence. All SoftwareONE employees in every subsidiary or branch office, regardless of the location, must comply with all applicable data protection (in particular the EU General Data Protection Regulation – GDPR) and privacy laws and ensure that any personal data is obtained properly, kept securely and is used only for those business purposes for which the data was obtained. Personal data is all information that allows a person to be identified, including name, identification number, email

address, telephone numbers, bank details etc. To be able to use such information, including storing, adapting, retrieving, sharing and deleting, we need to have the consent of our customers. This consent may be withdrawn by the customers at any time. Note that data protection regulations also contain precise rules on procedures to be followed in the case of a data breach, on the requests for access to data, on the right for data to be deleted etc. In addition, there are rules that apply when sending personal data between certain countries and you must be aware of any potential restrictions applicable to your activities. You must make sure that no one else but you has access to your personal work computer by locking it with a password and changing it regularly. Business related communication has to be processed through SoftwareONE's business system. All employees must strictly comply with the IT Policies and the IT Enduser-Policy. Finally, you are responsible to ensure that appropriate security measures (f. ex. secure encrypted emails) are taken when sending personal data outside of SoftwareONE and that SoftwareONE assets containing personal data (e.g. briefcases, laptops) are not left unattended when you are away from SoftwareONE's sites or your home. Any questions or remarks that you may have regarding privacy and data protection can be addressed to a SoftwareONE Data Protection Officer.

8 Keeping Things Secret

Given the competitive industry we are in, certain information is obviously secret or confidential in nature. Confidential information may include trade secrets, business plans or outlooks, financial data, price and customer details, new products, agreements with suppliers, internal communications and information relating to legal proceedings or disputes. You must not disclose SoftwareONE's confidential information outside of the company except on a need to know basis in order to perform your duties on behalf of SoftwareONE. If you leave SoftwareONE, then you must be aware that the restrictions on disclosing confidential information continue to apply while the information is not generally available to the public (in this regard, please refer to our Information Security and Data Protection policy by IT).

9 Careful Communication

You are responsible for ensuring that your communication, whatever the form may be, is clear, correct and appropriate. Responsible and appropriate communication is essential to our business, reflects our values and is key to our reputation. Copies of communication may be used as evidence in a courtroom, in submissions to government agencies that regulate our business and in the development of articles by the media. Communication may include written memoranda, handwritten notes, e-mail, computer files and voice mail. Ensure communication is only sent to those who have a need to receive it and avoid email chains with unnecessary content or recipients.

10 Intellectual Property

SoftwareONE's intellectual property is an important asset. We are committed to protecting our brands, as well as the brands of our clients. This means that we must all safeguard the intellectual property of SoftwareONE and our clients, including trademarks, service marks, patents, copyrights and trade secrets. In addition to causing substantial harm to the Company, the improper use of intellectual property can result in severe civil and criminal penalties.

Consistent with our commitment to protecting the intellectual property of SoftwareONE, it is our pledge to protect the intellectual property of others. It is never permissible to reproduce, distribute or alter copyrighted materials without permission of the copyright owner or its authorized agents. Additionally, software used in connection with SoftwareONE's business must be properly licensed and used only in accordance with that license, as using unlicensed software could constitute copyright infringement.

11 Record Keeping and Financial Integrity

All records and reporting of information, including financial records, must be accurate, complete, timely and must accurately reflect the condition, operations, and financial results of the business to which they relate. The Company is subject to laws and regulations, as well as contractual obligations, relating to records preservation. These laws, regulations and agreements require retention of certain records for various periods of time. All employees must follow SoftwareONE's policy on these matters. In case of doubt, please consult with your supervisor or the Group Compliance Officer before discarding any record.

12 Unfair Competition and Antitrust Laws

Competition and antitrust laws and regulations are designed to prohibit conduct that may damage fair competition. These laws include prohibition of agreements or undertakings among competitors, both express and implied, with the effect or intent of fixing prices, limiting production, allocating markets or otherwise limiting competition. In addition, sharing information concerning pricing, production capacity, marketing plans, and related matters with competitors, as well as certain anticompetitive practices involving suppliers or customers may be prohibited by these laws.

13 Respect for our Neighbors and Business Relationships

SoftwareONE and its affiliated companies do business all over the world. We are committed to being responsible corporate citizens and good neighbors. This requires us to be aware of and to respect the traditions, business customs, social norms, and expectations of our host countries and make every effort to pursue the right course of action.

14 Money-Laundering, Support of Criminal Organizations and Terrorism

Money laundering is defined as a financial or economic transaction that serves the purpose of introducing illegally acquired funds into a legal financial system. Such funds may originate from drug trafficking, organized or other crime, or relate to terrorism. SoftwareONE does not tolerate money laundering and takes a clear stand against it.

Equally, SoftwareONE does not do business with organizations pursuing the objective of committing crimes or securing financial gain by criminal means.

We only cooperate with honest and trustworthy business partners and will immediately terminate our business contact if we become aware that a company is involved in any of the above. As an employee you must at all times comply with the relevant local laws and inform your supervisor or the Compliance Officer of suspicious transactions or behavior.

15 Export Controls and Trade Sanctions

Export control regulations prevent the proliferation of arms, goods, software and/or technology that can be used for military purposes. If you are involved in the export of goods, software or technology that serves military purposes you are required to examine each individual situation with utmost care and seek advice in case of doubt.

The United States, the European Union and the United Kingdom, among others, have policies that restrict trade, and restrict facilitating trade, with certain countries, entities and/or individuals. Trade sanctions may, therefore, be issued against countries as such, governments, residents, nationals as well as against entities. Reasons for trade sanctions vary to include criminal activities of governments, persons or entities, or may be issued for political reasons.

You must be aware of export controls and trade sanctions, and of the fact that violations of such restrictions may be heavily penalized. Consequently, you must be vigilant not to violate any export control measures or trade sanctions. In case of doubt please refer to your Legal or Compliance Officer.

16 Avoiding Conflicts of Interest

Whenever you are acting in your capacity as an employee or other representative of SoftwareONE, you must base your decisions on the best interests of SoftwareONE rather than your personal self-interest. In other words, you must avoid conflicts of interest or the appearance of a conflict of interest. Along with legal and ethical considerations, you must at all times be governed by the best interests of SoftwareONE.

It is important that you disclose to your supervisor or to the Group Compliance Officer any situation that may present a conflict of interest between you and the Company arising from your financial investments, family relationships, other personal relationships or a business/position you are conducting which is not in relation with SoftwareONE. Such disclosure will allow appropriate action to be taken to avoid actual, potential or apparent conflicts of interest. Further, you must not take any decisions or conduct any transactions on behalf of SoftwareONE in case a conflict of interest arises or until cleared by your supervisor or the Group Compliance Officer.

17 Searching for Guidance or Reporting Questionable Behavior

SoftwareONE requires all leaders and employees to comply with laws, regulations and directives as well as instructions given by line leaders. If you have questions or doubts on specific matters with regard to the correct behavior in the context of the Code of Conduct, or wish to report questionable behavior, or a possible violation of the Code of Conduct, you are encouraged to work with your primary contact in resolving your concern. If that is not possible or appropriate, please contact the Group Compliance Officer.

SoftwareONE will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Code of Conduct.