one code of conduct
Message from the CEO

Hi 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 clients, 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 core 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 core values every day. It’s through your efforts and commitment that we continue to grow and succeed. I am immensely inspired by our achievements and even more excited by what lies ahead.

Best regards,

Brian Duffy
CEO, SoftwareOne
This Code of Conduct is designed to be your ultimate resource in enabling you to succeed in your role with integrity and commitment to doing the right thing.

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

**Integrity**
We are consistent, honest and fair and always do what is right.
- **We share our concerns**

**Employee Satisfaction**
Our greatest asset. We love and support our colleagues and operate without hierarchy.
- **We are committed to you**
- **We treat each other fairly**
- **We stand for equal and fair compensation**

**Passion**
We strive for excellence, go the extra mile and have fun in what we do.
- **We love what we do**
- **We protect our intellectual property**
- **We avoid conflicts**

**Speed**
Fast is better than slow but we will not compromise on quality.
- **We strive for excellent customer experience in a timely manner**
- **We stand against money-laundering**
- **We do not tolerate corruption & bribery**
- **We keep our information confidential**

**Customer Focus**
We exceed expectations through great discipline and ensure a world class customer experience.
- **We do our best in building strong customer relations**
- **We accept and give gifts only if appropriate**
- **We protect our data**

**Discipline**
In everything we do. We accept responsibility and deliver on all of our commitments.
- **We are dedicated and determined**
- **We respect our physical assets**
- **We are accurate with our finances**
- **We respect export controls**

**Humble**
We constantly look to improve and never forget the importance of our customers and colleagues.
- **We take care of our environment**
- **We communicate kindly**
- **We respect market competition**
- **We do not trade on inside information**
We share our concerns

At SoftwareOne, if you see something, say something.

Integrity is at the heart of who we are. 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. Integrity also means that we need to act if the Code is being disrespected. Any violation or non-compliance with our Code of Conduct may therefore result in disciplinary action and, depending on the severity of the offence, could lead to an employment contract being terminated.

E-Mail: compliance.global@softwareone.com

Integrity Line: softwareone.integrityline.org
Values

We are committed to you
Your human rights are our priority.

We treat each other fairly
Everyone deserves to be treated with respect and dignity at all times.

- SoftwareOne does not tolerate harassment and discrimination of any kind.

- We are committed to being responsible corporate citizens and good neighbors.

- But we need your help.

Your internationally protected human rights are safe here. We will always ensure we provide you with a secure work environment that respects your health and well-being. We are committed to ensuring that forced, bonded or compulsory labor is not used, and all our employees are free to leave us (so long as you give reasonable notice per your contract or by national law that is). 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 and will adopt measures to ensure that there is no child labor within our supply chain.
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.

We avoid conflicts

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

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 permission of the copyright owner or its authorized 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 do not tolerate corruption & bribery

Despite the fact that we always strive for great customer experience in a timely manner, sometimes we all have to take a moment to consider our actions.

We keep our information confidential

Sharing information in a hurry can be detrimental.

We stand against money-laundering

Take your time to understand who you are dealing with.

Extortion, bribery and corruption, including improper offers for payments to or from, or improper entertainment of employees or organizations is not acceptable. **We will support all employees who may face losing a deal or an opportunity in order to avoid paying a bribe.** This includes accepting or giving improper payments from office holders, clients, business partners, suppliers or anyone to incite such behavior to achieve unfair advantages. Already making or accepting a promise for improper payments is deemed to be corrupt behavior, even if no payment is made in the end. If you feel unsure prior to a meeting or event, don't go alone, bring along a fellow employee or your supervisor. We do not accept any offers of improper payments.


**We accept and give gifts only if appropriate**

We do our best in building strong customer relations, however, we accept and give gifts only if appropriate.

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**We protect our data**

All of us have a responsibility to protect the personal data of SoftwareOne and our customers.

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Any gift, payment or benefit given to you by one of our customers, partners or any third party that is appropriate and below CHF 100 does not require any pre-approval, unless you work in a subsidiary that has adjusted this threshold. You must gain approval from your leader if you are given anything valued between CHF 100 – 200. If an item you are being offered exceeds CHF 200 or if you are unsure of the value, disclose using the Disclosure Tool.

**Offering gifts, entertainment, or other business courtesies could be perceived as bribes.** Any items that are given to one of our third parties may require additional approvals. However, as a rule please ensure that all gifts are infrequent, of reasonable value and are appropriate in the business situation. If you intend to give anything over CHF 100, please use the Disclosure Tool. Also, please be mindful of the fact that legislation in many countries considerably restricts the value of any gifts or invitations to be extended to public officials. If in doubt as to thresholds or as to who is considered a public official, please reach out to Legal & Compliance for advice or refer to our Gifts and Entertainment Policy.
We respect our physical assets

Each of us is committed to protect the assets of SoftwareOne.

We are accurate with our finances

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

We respect export controls

It is everyone’s responsibility to comply with export controls and trade sanctions.
We take care of our environment
SoftwareOne is committed to taking steps towards making the world a better place.

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

We communicate kindly
Responsible and appropriate communication is essential to our business, reflects our values and is key to our reputation.

We do not trade on insider informations
Regardless of your insight and role at SoftwareOne, any key information that is not public, even a ‘tip’ or guidance, is information you must not disclose.

At SoftwareOne we understand our environmental responsibility and strive toward contributing positively to the preservation of our planet’s resources. It is our commitment to minimize our environmental footprint, to reduce and eliminate waste of all types and to implement appropriate conservation measures, e.g. by recycling, re-using, or substituting materials. We view the task of instilling environmental responsibility as a part of our core values and will measure our progress by monitoring impact. We will invite our partners to join us in our mission and will bear these considerations in mind when entering into future partnerships.
**Contact Information**

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.)

**Public Official/State-owned entity employee**

Any entity or individual not affiliated with SoftwareOne, including customers, partners, publishers, suppliers and vendors.

**Third Party**

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 otherwise to attempt to influence a decision regarding SoftwareOne.

**Bribe**

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.

**Gifts & Invitations**

Non-public information that would be reasonably likely to affect an investor's decision to buy, sell, or hold the securities of a company.

**Material Non-Public Information**

Any information relating to an identified or identifiable natural person.

**Personal data**
thank you