



**Business Code of Conduct**

October 2023

## Letter from the CEO

Dear Accuris Team,

Every day, our products and services touch the lives of people around the world both directly and indirectly – something I view as both a great privilege, as well as a great responsibility. Achieving such a global reach requires many moving parts to consistently fit together, but it is the foundation of these parts that is built internally, by an intentional company culture.

Together, we have defined that culture. We have asked ourselves why we want to work here, why our work matters, who it impacts, and how it positively leaves a mark on the world. Our vision and mission serve as guiding principles on not only what we do, but how we do it. They allow us to make good, informed decisions, lead with integrity, and act with all aspects of ethics in mind. Every one of us at Accuris has an obligation to know, understand, and live this code of our business both in letter and in spirit. It should be the first consideration we ask ourselves in all choices – from large strategic conversations to daily interactions.

I am personally committed to maintaining a culture where people are encouraged to seek advice, voice concerns, or report possible misconduct without fear of retaliation in doing so. Our company cannot achieve our vision without each of your individual voices and accountability to this code, and I am grateful that you trust our company to listen and navigate alongside you. If you have any questions on this code or if something feels out of place, please contact our hotline or any channels available to you, including myself.

This is not simply a document. It serves to represent something much larger, and it needs to work for you, our team members. If you have any questions, comments, concerns, or suggestions on how we can improve, please reach out.

Thank you for your ownership in Accuris, and for representing us well both internally and externally.

Sincerely,

Claude Pumilia

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## Introduction

We are Accuris. With this in mind, each and every colleague makes a valuable contribution to maintaining our company's reputation as the leader in engineering solutions information, analytics and solutions. We further this goal by upholding Accuris values and acting with integrity and accountability toward our fellow colleagues, customers, suppliers, business partners, governments and communities.

Our Code is the cornerstone of our commitment to acting ethically and in compliance with the law. It serves as a guide for ethical decision-making, and it provides information regarding the most common ethical and legal dilemmas we may face when conducting work on behalf of Accuris.

Although our Code is comprehensive, it does not cover every situation that may arise. Therefore, it may be necessary to reference individual policies, procedures or guidelines to obtain more detailed information. Regardless of whether an issue is specifically addressed in our Code, we expect you to use good judgement and common sense when making decisions.

## Our Shared Commitment

Our Code applies to all colleagues, officers and board members in all locations where Accuris does business and to our Accuris operating entities (i.e., the entities it uses to license Products and Services) such as Allium US Holding LLC for the Americas and Allium UK Holding Limited for EMEA and APAC. We are all expected to read and follow the Code as well as all company policies, procedures and guidelines that govern our work. Many of these documents are available on the Accuris intranet or are on file with your regional Human Resources representative. If you need help finding or understanding a policy, speak with your manager or anyone listed in the section titled "Where to Seek Help and Report Concerns."

We must also follow all laws and regulations that apply to our work. At times, these may include laws in place in more than one country and those in place in a country other than where you are employed. If you find yourself in a situation in which local law or customary conduct conflicts with our Code or other company policies, you must follow the most restrictive standard.

If you know about or suspect a violation of our Code, company policy, law or regulation, you owe it to your colleagues and to Accuris to make your concerns known. Doing so is necessary to uphold Accuris values. You are encouraged to report any issue to your manager or anyone listed in "Where to Seek Help and Report Concerns."

We also expect our suppliers and other business partners to do business according to the law and the ethical standards included in our Code. If you know or suspect that a supplier or other business partner is violating the law or our ethical standards, you are obligated to report the situation to your manager or anyone listed in "Where to Seek Help and Report Concerns" immediately.

## Our Managers' Responsibilities

Accuris managers are expected to serve as ethical role models for all colleagues by exemplifying our company's values at all times. These leaders must communicate the importance of the Code and strive to create a positive work environment in which colleagues feel comfortable asking for help

and raising concerns related to the Code or other company policies. Managers must also be alert to situations or actions that may violate the letter or spirit of the Code or other company policies, or that may damage the company's reputation. It is important that managers take immediate action to address such situations. Under no circumstances may managers commit an illegal act, instruct or enable others to do so.

When a manager receives a report of a situation that involves potential ethical or legal misconduct, he or she must promptly notify our Legal department, his or her regional Human Resources representative or anyone else listed in "Where to Seek Help and Report Concerns. Managers who know about, or reasonably should know about, misconduct and do not act promptly to report it will be subject to disciplinary action. In addition, managers must never engage in, tolerate or condone retaliatory acts made against anyone who reports misconduct in good faith. Instead, managers are expected to clearly communicate to their teams our company's "no retaliation" policy.

## Report Concerns

### Where to Seek Help and Report Concerns

At times, you may encounter a situation in which you are unsure of the right course of action. If you face such a situation, ask yourself the following questions:

- Is the decision or action legal or ethical?
- Does the decision or action comply with our Code and other company policies?
- Do you have all the information you need to make an informed decision?
- Can you confidently defend your decision or action to your colleagues, manager, regulators or a government agency?
- Would you want the decision, action or repercussions of the action to be reported in the press?
- Would you want your friends, family or colleagues to learn about the decision or action?

If your answers to these questions do not clarify whether you should take the action, seek guidance before proceeding. Remember, even if an action is technically legal but appears unethical, you should consider taking an alternate course.

If you need help or would like to voice a concern, your manager is likely the best person to speak to because he or she knows your department and your work situation. However, you are also encouraged to contact any of the following resources when seeking assistance:

- A Human Resources representative
- A local or regional Legal representative
- The head of Internal Audit
- The General Counsel
- The CEO
- Our Compliance Hotline

### Reporting Misconduct

Your obligation to observe the highest standards of personal integrity is more than just an individual responsibility. You also have an obligation to promptly speak up when you see others failing to act with integrity or violating our Code. This isn't always easy or comfortable, but we

expect you to help us maintain an ethical culture by reporting any concerns using the procedures outlined in our Code. For additional information about when and how to report misconduct, refer to our Compliance Hotline and Reporting Misconduct policy.

### Good Faith Reporting

The effectiveness of our Code and company policies is dependent on your judgement. We take concerns of misconduct very seriously and expect that any colleague, officer or board member who reports misconduct does so in good faith. Making a report in good faith means that you provide all of the information you have regarding the issue and believe the report to be true.

Bad-faith reporting or misuse of the reporting system is a violation of our Code and can be very damaging to Accuris and your fellow colleagues.

### Non-Retaliation

Accuris prohibits retaliation against anyone who, in good faith, reports known or suspected unethical or illegal misconduct, seeks advice, raises a concern or provides information in an internal or external investigation or legal proceeding pertaining to the company. Retaliation can include, but is not limited to, coercing, intimidating, threatening, interfering or discriminating against any person for the purpose of interfering with any protected right or because they have exercised any protected right or aided or encouraged another person to exercise any protected right. Allegations of retaliation will be investigated, as appropriate. Individuals engaging in retaliatory conduct will be subject to disciplinary action, including termination of employment. If you believe you have experienced retaliation for making a good-faith report or for cooperating in an investigation, immediately contact the Compliance Hotline or anyone listed in “Where to Seek Help and Report Concerns.”

The Accuris Compliance Hotline is a third-party telephone- and web-based service that is available 24 hours per day, seven days per week. When local law allows, calls to the Compliance Hotline may be placed anonymously. Keep in mind, however, that maintaining your anonymity may limit our company’s ability to address your concerns or conduct an effective investigation. See our Compliance Hotline and Reporting Misconduct policy or our hotline provider’s website at [www.Accurishotline.ethicspoint.com](http://www.Accurishotline.ethicspoint.com) for additional information about submitting a report.

### Handling of Reports

All reports of misconduct will be investigated promptly, and appropriate action will be taken. Reports and complaints will be kept confidential to the fullest extent allowed by local law and consistent with the resolution of the issue. If the reported conduct is determined to be a violation of our Code, company policy or the law, the individuals involved will be subject to disciplinary action, up to and including termination of employment.

In addition, misconduct may be reported to the proper authorities, which may lead to civil and/or criminal prosecution.

When required by local law, individuals named in a report will be provided an opportunity to access the information reported and to make corrections if the information reported is incorrect.

## Co-Workers Acting with Respect and Integrity Toward Each Other

### Inclusion and Diversity

Teamwork is the key to our success. To work as a team, we must value one another and work together to further our professional excellence. This means we must treat everyone in the workplace with respect by valuing differing ideas, opinions and experiences. While we have a right to our own personal beliefs and values, we must avoid imposing them on others when conducting work on behalf of Accuris.

### Discrimination and Harassment

To maintain an inclusive and diverse workplace, each of us must take steps to ensure that it is free from acts of discrimination. Whether conducting business in one of our offices or offsite, always treat others with respect and dignity, and contribute to a workplace that is characterized by inclusiveness. Any form of discrimination or harassment based on a person's race, color, religion, sex, sexual orientation, gender identity or expression, national origin, disability, age, pregnancy, veteran status or any other characteristic protected by law is strictly prohibited and will result in disciplinary action up to and including termination of employment.

Harassment is offensive behavior that interferes with another's work environment or creates an intimidating or hostile workplace. Harassment can take many forms and may or may not be sexual in nature. Harassing or bullying behavior includes, but is not limited to, unwelcome sexual advances or remarks, slurs, off-color jokes or disparaging comments about another's race, religion, ethnicity or sexuality. This is true regardless of whether harassment or bullying is actionable under local law in the country where you are working.

Acts of discrimination or harassment will not be tolerated. If you believe that you or someone else may have experienced discrimination or harassment, report the situation to your manager, regional Human Resources representative or anyone listed in "Where to Seek Help and Report Concerns." For additional information, see our discrimination and harassment policies on the Accuris intranet. You are protected from retaliation for making a good-faith report.

### Workplace Safety and Security

We must all work together to maintain a safe and secure work environment. This means you must always follow all workplace health and safety rules and procedures as well as any applicable laws and regulations. This includes our policies and procedures relating to the maintenance of a violence-free and substance-free workplace. By keeping workplace health and safety at the forefront of our minds, we avoid risk to ourselves and to those around us.

If you are aware of an unsafe working condition that poses a danger to yourself or others, you are to report it immediately to your manager, our Workplace Resources/ Facilities team or your location's site leader. Site leaders serve as a key conduit for information-sharing between the company and local colleagues. If a situation poses an imminent threat to you or others, report the issue immediately to your local law enforcement agency, your onsite security personnel, your manager and our Human Resources department.



## Employee Information

During your employment with Accuris, you may come into contact with the personal data of your colleagues. Each of us has a duty to protect this information by following all applicable data privacy laws and procedures that are in place in the locations where we do business. This means we may not access another colleague's personal information without specific authorization and a legitimate business-related need. In addition, we may not share this information with anyone, either inside or outside the company, who does not have a business need to know it. At all times, we must properly protect all such data in our possession.

Many countries have their own legal requirements governing the use of personal information. This is a complex and rapidly changing area of law. Speak with someone in the Law department if you have questions about the proper use and dissemination of personal data.

## Social Media

When speaking in a public forum, you do so as an individual, and thus—unless previously authorized to do so—you should not give the impression or appearance of speaking officially on behalf of Accuris. To ensure acceptable use of social media, be sure to review our social media policies and resources, which can be found on the Accuris intranet. Use of a personal account on social media channels or creation and/or use of a blogging site are subject to applicable company policies as well as any agreements you have with Accuris, such as those restricting the disclosure and use of confidential information. If you have questions or concerns about social media communication, contact our Marketing team.

## Professional Networking

Social sites such as LinkedIn and Twitter provide excellent channels for colleagues to network and exchange information. Employees, officers and board members should use good judgement when posting information about themselves or Accuris on any public channels.

What you post about Accuris or yourself will reflect on all of us. When using professional networking sites, observe the same standards of professionalism and integrity described in our Code and follow the social media guidelines outlined above. For additional information about your obligations, refer to our Social Media policy.

## Media, Government and Public Enquiries

To ensure that our communications with the news media, investors and investment analysts are consistent, accurate and ready for public disclosure, only designated Accuris spokespersons may make statements to these constituents on the company's behalf. If a media representative, investor or analyst contacts you about a company matter for which you are not authorized to comment, ask for the person's contact information and the nature of the query. Then refer him or her to the appropriate Accuris representative.

## Public Speaking and Interviews

Before publishing, giving a speech or granting an interview in your capacity as a colleague, officer or board member officially representing Accuris—or if a publication, speech or interview might in any way be connected to your position or role—obtain prior approval from the Marketing department.

## Regulators and Government Agencies or Officials

All requests from regulatory authorities, government agencies and officials should be directed to the Legal department. Responses to all such requests must be approved by the Legal department.

## Shareholders Acting with Integrity Toward Our Shareholders

### Our Commitment to Ethical Business Practices

We are committed to conducting business with integrity. Our obligation to act ethically starts with open and honest communication with our colleagues, customers and all others with whom we interact. In addition, we have an obligation to act in the best interests of Accuris by protecting its information and assets, our colleagues and our customers, and by avoiding situations that could compromise the ability to act objectively on behalf of the company.

### Conflicts of Interest

Each of us has an obligation to act in an honest and ethical manner and in the best interests of Accuris. Avoid situations that may present an apparent or actual conflict between your interests and the company's interests.

A conflict of interest can exist if a personal, social, financial, professional or political activity interferes, or appears to interfere, with your ability to perform your duties effectively or objectively, or if it interferes, or appears to interfere, with the interests of Accuris generally.

It is also a conflict of interest for you to take for yourself a business opportunity that arises as a result of your position at Accuris, use Accuris property or information or the company's position for personal gain, or otherwise compete directly with Accuris.

Although it is not possible to describe every situation in which a conflict of interest may arise, some common examples follow. Remember that these guidelines also apply to members of your "immediate family," including a spouse, significant other, parent, grandparent, child, grandchild, sibling, in-law, step-relative or any other family member living with you. Also note that you have a duty to our company to disclose any situation that involves an actual or potential conflict of interest to your manager and our Law department immediately upon discovery. For additional information about your obligations, refer to our Conflicts of Interest policy.

### Gifts, Meals and Entertainment

One of the most common areas in which conflicts of interest arise is when we offer or receive business courtesies—typically gifts, meals or entertainment. In general, modesty should be your guide in these situations. This means you may offer or accept non-cash gifts of nominal value when doing so:

- Promotes a successful working relationship and overall goodwill
- Relates to a legitimate business interest
- Conforms to the reasonable and ethical practices of the country location
- Does not create an actual conflict of interest or divided loyalty
- Does not create the appearance of an improper attempt to influence business decisions

You may also offer or accept customary business meals and entertainment, provided the meal or entertainment:

- Is reasonable in value
- Occurs at an appropriate venue
- Is not prohibited by the offeror's or recipient's business practices
- Does not influence or give the appearance of an improper attempt to influence business decisions

The guidance provided above is typically acceptable in commercial business environments. However, it may be against the law to offer gifts, meals or entertainment to government employees and officials. As a result, you may not make any such offer to a government employee without first receiving approval from the Law department.

In any other situation, if you are unsure whether you may offer or accept a gift, meal or entertainment, contact the Law department.

### Outside Employment

Conflicts of interest also commonly arise when we engage in outside employment or other business interests, with or without compensation, while employed at Accuris. If you are an employee of Accuris, under no circumstances may you take an outside position as an employee, consultant or director with a company that is an Accuris customer, supplier or competitor. In addition, you may not accept outside employment or engage in any outside business activities if doing so could compete with Accuris business interests or interfere with your ability to perform your work for Accuris.

### Corporate Opportunities

You may not accept or pursue business or personal opportunities that arise as a result of your position at Accuris or through the use of Accuris property or information.

This includes:

- Business or investment opportunities, unless and until our company has had an opportunity to evaluate them and has chosen not to pursue them.
- Opportunities to purchase goods or services for personal use that are offered by our company's suppliers on terms other than those available to the general public or established by company policy.

In addition, you may not have a personal interest in a transaction involving Accuris or an Accuris customer or supplier. Finally, at no time while employed by Accuris may you compete in any line of business of Accuris, regardless of the manner in which the opportunity to do so arises.

### Personal Relationships and Relatives

To avoid a conflict of interest, including the appearance of favoritism, you may not work directly for, work in the same chain of command as, supervise or make employment decisions about an immediate family member or an individual with whom you are involved in an intimate personal relationship. Similarly, you may not have a business relationship with a company in which you or a family member has ownership or other financial interest. Conflict-of-interest situations may not always be obvious or easy to resolve. However, if you know or become aware of any relationship

that may constitute an actual or potential conflict of interest, you must immediately disclose it to your manager and our Law department. For additional information, see our Conflicts of Interest policy.

## Company Assets

By working for Accuris, we have made a commitment to each other, our company and our shareholders to use our company's assets appropriately. Each of us is responsible for taking care when using Accuris property, making sure our use promotes a legitimate business purpose. At all times, we are obligated to protect Accuris property from theft, damage, loss and misuse. Any actual or suspected theft, damage, loss or misuse should be immediately reported to anyone listed in "Where to Seek Help and Report Concerns."

## Information Technology Systems

You must only use Accuris information technology (IT) networks and systems for responsible and authorized business purposes in accordance with applicable company policies. Company IT networks and systems must never be used to access, create, store or transmit material that is defamatory, libelous, sexual, racial, offensive, indecent, obscene or harassing, or to inappropriately disclose another's personal information. In addition, only company-approved software may be downloaded onto an Accuris computer or device.

Since the IT systems we use when working for Accuris belong to our company, we should not expect that emails, internet activity or voicemails transmitted or received on Accuris network systems are private. Our company may monitor electronic communications and information created and/or stored on a company asset and may also review content for specific purposes unless this activity is prohibited by local law. See our Use of Technology and Digital Communication policy for additional information regarding the proper use of Accuris IT networks and systems.

## Intellectual Property

Our intellectual property and proprietary information are extremely valuable assets and the result of substantial monetary investment on the part of Accuris, business planning, research, development and the hard work of colleagues. Accuris intellectual property and proprietary information preserve our competitive advantage in the marketplace and are essential to our success.

Proprietary information is any information that is owned by Accuris, including information in Accuris databases and confidential or publicly available information, whether or not such information is subject to copyright, patent or other intellectual property right protections. A few examples of proprietary information include: Accuris publications; technical or financial information relating to current or future products, services or research; business or marketing plans or projections; earnings and other financial data; personnel information, including executive and organizational changes; and software.

We are obligated to safeguard our company's proprietary intellectual property, even if public, which includes our trademarks, patents, copyrights and inventions. Note that Accuris owns the copyright in works and the patent rights in innovations that we develop during the course of our employment. Our obligation to protect this information continues even after our employment ends. At that time, we must return all confidential and proprietary information in our possession. For additional information about protecting intellectual property, see our Intellectual Property policy.

## Third-Party Information

Just as we must act to protect the confidential and proprietary information that belongs to Accuris, we must also protect any such property belonging to others.

Each of us must take care to avoid infringement of non-Accuris intellectual property by avoiding any unauthorized use of a protected invention, identifier (such as a name or logo) or work (such as a photograph, printed materials or software). You may never knowingly make use of that information without obtaining prior permission from its owner. If you have questions, contact our Legal department.

## Accurate Business Records

We must each do our part to make certain that the financial documents our company discloses to the public are full, fair, accurate, timely and understandable. We can assist in this process by making sure the information we submit in company records—including personnel, time and expense records—is accurate and complete. Those of us whose job duties involve recording this data must make sure we do so in compliance with our company's system of internal controls and all applicable accounting requirements.

In addition, we may only engage in legitimate and authorized business transactions. We must never hide company funds or create undisclosed or unrecorded fund accounts.

Our obligation to maintain accurate corporate records includes:

- Cooperating fully with accountants and internal and external auditors
- Ensuring that our books, records and accounts, including time sheets, invoices, bills and expense reports, are accurately reported, whether verbally or in writing
- Applying accepted accounting principles and other accounting standards when involved in the preparation of financial statements
- Accurately reporting sales
- Ensuring that business travel and other expenses are in line with our internal policies

## Quality of Public Disclosure

Any reports and documents filed with or submitted to regulatory authorities and our other public communications should always be complete and accurate and, where applicable, include full, fair, accurate, timely and understandable disclosures.

## Records Retention

Properly maintaining and destroying records is an important aspect of keeping accurate business records. We must retain all Accuris records in conformity with the guidelines set forth by our company as well as local laws. These guidelines and laws dictate the length of time to keep business records as well as the way in which they are to be destroyed.

If you are notified by our Legal department that the records you possess are relevant to an anticipated or pending litigation, investigation or audit, follow the guidelines set forth in that notification. Do not destroy documents in anticipation of such a notification, and do not alter, conceal or destroy any covered document unless our Legal department instructs that you may do so. Further, if you receive a subpoena or a request for information from a third party, submit the document to our Legal department immediately, before taking or promising any action.

## Investigations and Audits

During the course of our employment, we may be asked to participate in an investigation or provide information in connection with an audit. We owe a duty to our company to fully cooperate with any such request. We must provide only complete and truthful answers and never attempt to mislead or improperly influence an auditor or investigator.

## Trading on Inside Information

While working on behalf of Accuris, we may become aware of material non-public information about our company, other companies or the market in general.

Material non-public information (also known as “inside information”) is information about a company that is not known to the general public and that could influence a typical investor’s decision to buy, sell or hold that company’s securities (or other investment decisions related to that information). We should always consider whether the non-public information we have knowledge about through our employment is material. Any such information should be considered non-public until it has been effectively disclosed to the public and a reasonable waiting period has passed to allow it to be absorbed by the marketplace.

Additionally, we may never share inside information with anyone outside our company or use this information for our own benefit. Even within the company, we must not share inside information with anyone who does not have a need to know it. In particular, we may not use inside information to trade in securities or provide a related “tip” to a family member, friend or any other person. This action is contrary to Accuris policy and may also be a violation of securities laws.

Below are some examples of non-public information that you may encounter in your role at Accuris:

- Quarterly or annual earnings or sales
- Gain or loss of a major customer
- Changes in management
- Major developments specific to an industry
- Government or Accuris reports of economic trends or indices (e.g., housing starts, employment, PMI, etc.)
- Major acquisitions or divestitures
- Major corporate transactions

Prior to engaging in any securities transaction, make sure to consult all related policies issued by Accuris and, if necessary, contact our Legal department with any questions you may have.

## Customers Acting with Integrity Toward Our Customers

### Fair Dealing

Although Accuris will compete vigorously to maintain our market position, we must do so fairly, being careful to communicate with candor and to never misrepresent the quality, features or availability of our products or services. This means maintaining high standards of fairness and honesty when engaging in marketing, promotion and advertising activities. At no time may we

engage in acts of manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other similar practices. We also may not make untrue statements about our competitors' products or services.

In addition, it is our policy to offer all of our products and services to customers or potential customers on a fair and non-discriminatory basis and in compliance with all applicable laws and our Code. We expect that our partners and suppliers will do the same. Under no circumstances should you engage a third party to perform any act prohibited by law or by our Code. Similarly, you must avoid doing business with others who violate the law or the standards of our Code.

If you have questions regarding the relevant permissible guidelines, contact your manager or our Law department for assistance.

### Gathering Competitive Information

To compete effectively with our peers, we need to understand our competitors and their products and services. Intelligence-gathering through legitimate and public sources is crucial to our continued success.

However, we must always exercise caution when engaging in this activity and make sure that we act in a lawful and ethical manner. You must not obtain information about our competitors through unlawful or unethical practices. This includes misrepresenting your identity, Accuris or any of our products or services and breaching contractual terms or intellectual property rights to gain access. Furthermore, you may not disclose or exchange commercially sensitive information to a competitor without prior approval from Legal.

If you receive or are offered data or information about a competitor under questionable circumstances, do not distribute or use the data. Speak to your manager or a member of the Legal department to determine how best to manage the information.

### Antitrust and Competition

To compete fairly, we must also follow the antitrust and competition laws of the countries where we do business. These laws are designed to preserve a level playing field for businesses by prohibiting certain formal and informal agreements and practices that unreasonably restrain or inhibit competition. To comply with these laws, we may not engage in discussions or enter into arrangements with competitors that may restrain trade, such as price fixing, bid rigging, limiting production or supply, or dividing or allocating markets, territories or clients.

Antitrust and competition laws also prohibit entering into certain formal or informal agreements with suppliers, distributors or customers that may restrict competition. These agreements often involve tying products, fixing resale prices or refusing to sell to particular clients or buy from particular suppliers. Exercise caution when discussing any of these topics, especially when attending industry association meetings. If a discussion ensues regarding a prohibited topic, stop the conversation immediately and report it to our Legal department or anyone listed in "Where to Seek Help and Report Concerns."

Antitrust and competition laws can be complex and violations may subject our company and its colleagues to criminal sanctions, including fines, imprisonment and civil liability. For additional information regarding this topic, see our Antitrust and Competition Compliance policy.

# Global Community Acting with Integrity Toward Our Global Community

## Anti-Corruption

The many communities in which we conduct business rely on us to act according to the highest ethical standards.

These standards require that we never engage in or otherwise promote bribery or corruption. This means that we may never make, promise, offer or authorize the making of a bribe, kickback or other improper payment in connection with our company's business if the purpose or intent is to improperly retain or obtain business or any other favorable action.

Not only is making or accepting bribes strictly prohibited by our policy, it is against the law in most of the countries in which we operate. It is our policy to comply fully with applicable anti-corruption legislation, including but not limited to the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act.

A "bribe" is broadly defined and includes "anything of value" that provides a financial or other advantage, including cash payments, gifts, stock interests, contractual rights, real estate, debt forgiveness, personal property, product discounts, loans, meals, entertainment, promises of employment, travel expenditure, political contributions, charitable donations and other interests arising from business relationships. A "kickback" is the return of a sum of money already paid or due to be paid as a reward for making or fostering business arrangements. Keep in mind that we cannot engage a third party to engage in this activity on our behalf.

We have a zero-tolerance policy for offering, promising or giving a bribe to another person or government official and requesting, agreeing to receive or accepting a bribe from another person. Under current laws and regulations in certain jurisdictions, these actions, if made by a colleague or third party representative, may constitute an offense committed by Accuris as well.

Anti-corruption laws are complex, and the consequences for violating these laws are severe. You are encouraged to discuss any concerns you have regarding bribery or corruption with our department.

For additional information about your obligations, refer to our Anti-Corruption policy.

## Global Trade Controls

Governments around the world regulate trade through restrictions on exports and imports of goods, technology, information and services. As a global company, Accuris is committed to full compliance with all applicable export control and sanctions laws, including obtaining proper export authorization, establishing eligibility of export recipients and securing all required licenses and documentation. It is our collective responsibility to know and comply with all relevant trade laws and regulations. Inappropriately exporting or importing goods, services or technology—even if inadvertent—can result in the loss of these export/import privileges and/or substantial fines. Therefore, it is important to understand our company's expectations if your work involves export or import activities. For information on global trade controls and related Accuris procedures, see our Export Controls and Sanctions Compliance Policy. Contact the Law department for guidance.



## Export Controls

Export control laws impose conditions under which certain products, software, source code, technology and information may be exported or re-exported. These laws cover more than just physical shipments. Internet and extranet transfers of technology, information and e-business activities all may be subject to export rules and regulations. An “export” occurs when a product, service, technology or piece of information crosses a country’s border or, in certain circumstances, is transferred between citizens of different countries, even if the transfer occurs within a single country.

## Economic Sanctions

Economic and financial sanctions come in many forms, and generally prohibit the provision of goods or services to certain countries or destinations, entities and/or individuals. Accordingly, it is necessary for Accuris to screen parties to each transaction and block all transactions with prohibited parties or destinations. The list of prohibited destinations and entities/individuals can change frequently; please contact the Law department for the most up-to-date list.

## Anti-Boycott

Due to our global operations, we must be alert for illegal boycott requests. A “boycott” is a situation in which one person, group or country refuses to do business with certain persons, groups or countries as a means of protest. As an international public company with a U.S. presence, we may not participate in or promote foreign boycotts that the U.S. does not support, such as the Arab League Boycott of Israel. This means that we may not agree to a contract, document or verbal request containing language that could be interpreted as an attempt to enforce an unsanctioned boycott.

Requests for boycott cooperation may be difficult to identify, but they commonly appear in contracts, letters of credit or bid or proposal materials. It is important to note that anti-boycott provisions apply to both interstate and foreign commerce activities as well as to transactions that occur entirely outside of the U.S.

If you receive a request to participate in any way in a boycott that is not sanctioned by the U.S., immediately report it to our Law department, even if you refuse to participate or do not respond. If you have questions about boycotts, contact our Law department for assistance.

## Anti-Money Laundering

We are committed to preserving our reputation in the business community by assisting in efforts to combat money laundering and terrorist financing. Money laundering is the practice of disguising the ownership or source of illegally obtained funds through a series of transactions to “clean” the funds so they appear to be proceeds from legal activities.

We have adopted measures to reduce the extent to which Accuris facilities, products and services can be used for a purpose connected with market abuse or financial crimes. Additionally, where necessary, we screen customers, potential customers and suppliers to ensure that our products and services cannot be used to facilitate money laundering or terrorist activity.

Contact our Law department if you have questions or concerns about our internal anti-money laundering processes and procedures.

## Human Rights

We are committed to conducting our business in a manner that respects the rights and dignity of all people, and that provides a diverse and inclusive workplace where all colleagues feel they belong. Through its commitment to responsible citizenship, Accuris supports and respects international human rights. We believe we can play a positive role in the communities where we operate.

Reflecting this belief, the Accuris Human Rights and Labor Practices policy outlines our commitment to ensuring that our corporate practices foster respect and dignity in our communities and promote diversity in the workplace. This policy further reflects our zero-tolerance approach to forced labor and human trafficking, both within our organization and throughout our supply chain.

Further, we support the principles contained in the United Nations Universal Declaration of Human Rights and the UK Modern Slavery Act. As a global company, Accuris continues to look for ways to contribute to the promotion of human rights and to efforts to create a transparent, accountable and ethical business society. For more information, refer to our Human Rights and Labor Practices policy.

## Waiver and Amendments

Any waivers of the provisions in this Code for executive officers or board members may only be granted by the Board of Directors or a committee thereof and will be promptly disclosed to our company's shareholders. Any waivers of this Code for other colleagues may only be granted by our Legal department. Amendments to this Code must be approved by the Board of Directors or a committee thereof and will be promptly disclosed to our company's shareholders when doing so is required by law or regulation.

## Enforcement

We take the obligations described in our Code very seriously. Our General Counsel has primary authority and responsibility for the enforcement of our Code, subject to the supervision of our Board of Directors or a committee thereof. Any colleague, officer or board member found to have violated our Code may be subject to disciplinary action, up to and including termination. Violations of the Code that involve illegal behavior may be reported to the appropriate authorities.

## Legal Notice

Accuris reserves the right to revise this Business Code of Conduct and its Corporate Compliance program at any time. Nothing in this Code constitutes a contract, promise or guarantee of continued employment. This Code does not create any contractual or other rights for shareholders, suppliers or any other person.