

Certinia Business Partner Code

1 August 2024

Foreword:

At Certinia, trust is our number one value. We must ensure we uphold that trust by acting with the highest ethics and integrity in everything we do and complying with the laws in the countries where we operate. Our business partners play an important role in our commitment to trust, and in our mission to enable our customers to thrive at speed in the service economy. We therefore hold our business partners to the same high standards to which we hold ourselves.

We have developed this Business Partner Code to set out the business practices and conduct we expect from all of our business partners, and to give you an idea of what you can expect from Certinia in return. This code gives an overview but will not address all the questions you may have or situations you may encounter. It is your job, as our trusted business partner, to take the time to understand and comply with the rules and laws in the places where you operate. We expect our business partners to conduct business with the highest levels of integrity and always in compliance with the law.

If you have questions about any of the information set forth in this Business Partner Code, please send an email to legal@certinia.com

Thank you for agreeing to be a Certinia business partner.

Regards

Allen Seto
Chief Legal Officer

BUSINESS PARTNER CODE - TEN STEPS TO SUCCESS WITH CERTINIA

Who is a Business Partner? “Business Partner” refers to any person or entity that provides services or goods to Certinia, performs services on Certinia’s behalf, distributes Certinia services, or with which Certinia collaborates as part of its business. This includes, for example, implementation partners, referral partners, resellers, service providers, suppliers, vendors, contractors, consultants, recruiters, representatives and agents.

1. We expect our Business Partners to become familiar with the contents of this Business Partner Code and ensure that they understand how the principles apply to them. We ask everyone to speak up when they have questions or concerns. We will promptly investigate all reports of suspected wrongdoing in relation to doing business with Certinia, and prohibit retaliation of any kind against any Business Partner that raises an issue or concern in good faith. Business Partners who have questions about the way we are conducting business should address their concerns to: (i) their Certinia business contact, (ii) the Certinia Legal Department legal@certinia.com) or (iii) the Certinia [Ethics Reporting Hotline/Portal](#). Reporting or escalating concerns about business practices, disclosing potential conflicts of interest and fully cooperating in investigations (when asked) are just a few of the ways we expect our Business Partners to help uphold trust.

2. Trust is our number one value. We expect our Business Partners to conduct business honestly, ethically and in compliance with the law, as we do. We protect the treasure of data that our customers entrust to us, and require our Business Partners to do the same. Our Business Partners must safeguard customer data, hold in confidence all non-public information obtained from Certinia or through our business relationship, and at all times act consistently with Certinia’s [Trust](#) commitment. We expect you to immediately notify Certinia if you have any concerns about the security, or you are aware of or suspect any misuse, of Certinia systems or data by contacting security@certinia.com.

3. We demand high standards when it comes to respecting the privacy of our customers, employees and others with whom we do business. As a company operating in many jurisdictions around the world, we are required to comply with many privacy and data protection laws. This means that we have to be very careful when collecting and using personal data or personally identifiable information (“PII”) about an individual. We expect our Business Partners to respect the privacy and data protection rights of all individuals whose data they may access or otherwise process on behalf of Certinia and to familiarise themselves with our [Privacy Statement](#). Business Partners should direct all questions and concerns concerning processing of, use of and/or access to PII to our Privacy Officer at privacy@certinia.com.

4. Our Business Partners must read and understand [Certinia’s Anti-Modern Slavery and Human Trafficking Statement](#). Certinia has a zero-tolerance policy toward modern slavery and human trafficking of any kind. Business Partners must take appropriate measures to assess the risk of modern slavery in their supply chains and to mitigate such risk. To the extent Business Partners are required to comply with legislation concerning modern slavery and human trafficking, Business Partners will comply at all times with their obligations under such legislation. Business Partners must commit to implementing effective systems and

controls to ensure slavery and human trafficking are not taking place in their business or their supply chains.

Business Partners are encouraged to self-assess the risk of modern slavery and human trafficking using the [Self-Assessment Questions](#).

5. We treat one another with dignity, respect and professionalism. We will not tolerate discriminatory or otherwise inappropriate behaviour. This applies to all of your interactions, not just those with our employees and customers.

6. We embrace the following business principles and we require our Business Partners to do the same:

1. Support and respect the protection of human rights;
2. Uphold the freedom of association and the effective recognition of the right to collective bargaining;
3. The elimination of all forms of forced and compulsory labour and a commitment to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business;
4. The effective abolition of child labour;
5. The elimination of discrimination in respect of employment and occupation;
6. Support to limit our impact on the environment and support initiatives to promote greater environmental responsibility; and
7. Work against corruption in all its forms, including extortion and bribery.

7. Paying and receiving bribes and engaging in corrupt activities are unacceptable and are not the way we do business at Certinia. Our Business Partners must ensure that they understand and comply with all applicable anti-bribery and anti-corruption laws, treaties and conventions, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

8. We are transparent when conducting business. All agreements and proposals that Business Partners negotiate with Certinia or on its behalf must be in writing, be duly executed, and must accurately reflect all agreed terms. We strictly prohibit side agreements that have not been approved by our Legal Department.

9. We compete fairly in the marketplace. Our Business Partners must understand and abide by competition laws (also called anti-trust laws). We expect our Business Partners to be mindful that there may be times when their interests may conflict with or appear to conflict with our interests. In all such instances, we expect our Business Partners to promptly notify us of the potential conflict so that we can investigate it and determine the correct course of action under the circumstances. Our Business Partners should never accept or give a gift or make an offer of hospitality to a third party (including our employees or our customers) if doing so will improperly influence or appear to improperly influence the person who receives it. Gifts of nominal value and occasional ordinary, non-extravagant hospitality where business will be discussed are generally permissible. When in doubt, err on the side of not giving or accepting the gift or offer of hospitality.

10. We comply with export regulations. We expect our partners to comply with all national and multinational export and import control laws that apply to our products and services. For instance, the U.S. and the European Union have laws that control which technologies may be exported as well as the locations to where they may be exported.

Self-Assessment Questions:

Please consider the following questions, and if as a result you have any concerns about modern slavery or human-trafficking in your supply chain please immediately contact legal@certinia.com for assistance.

Q1. Does your company or your group operate in a high-risk country or sector?

<https://www.globalslaveryindex.org/index/>

Q2. Does your company or group source goods or services from high risk countries or sectors?

Q3. Does your company or group use third party labour providers in high risk countries/sectors?

Q4. What controls does your company or group have in place for detecting, addressing and preventing modern slavery in its supply chains?

Q5. Are your company's or group's procurement policies and procedures tailored to address modern slavery?

Q6. Has modern slavery previously been discovered in the company's or group's supply chain?

Q7. Are there other labour problems in the business or supply chains that do not amount to modern slavery (e.g. workers being paid below living wage or subject to substandard working conditions)?