



THE SYCOMP CODE OF CONDUCT

This Code of Conduct (the “Code”) outlines how Sycomp and all its global subsidiaries (collectively the “Company”) will conduct business. The Code explains Sycomp’s key values and promotes integrity and ethics Company wide. As a global provider of complex IT solutions Sycomp relies heavily on its reputation as an ethical supplier and the Company’s desire to conduct business in an ethical way drives our culture.

At Sycomp, all of our employees are expected to follow the letter and the spirit of this Code. Part of that commitment to fostering an ethical culture is a commitment by all Sycomp employees to abide by the terms of this Code, all internal policies and procedures, and applicable foreign and domestic rules and regulations. If you ever have a question or concern regarding this code, or your responsibilities as a Sycomp employee, please contact the Legal Department at legal@sycomp.com.

Compliance with this Code

Upholding Sycomp’s policies is the responsibility of all Sycomp employees. To accomplish this, all Sycomp employees are expected to:

- **Read, understand, and comply** with the Employee Handbook and all related Sycomp policies;
- **Ask for help** or clarification when needed;
- **Speak up** about any potential violation until they are heard; and
- **Be truthful** and cooperate fully in any internal investigations (*e.g.*, do not conceal or destroy information).

Reporting Concerns

If there is ever a time where you are unsure how to handle a situation, or if you think another Sycomp employee or vendor is not adhering to the letter and spirit of this Code, it is your responsibility to voice your concern. It is impossible for the Company to address and fix areas of concern without the help of our people.

There are multiple ways you can report your concerns. You may either go directly to your manager, or if you are not comfortable speaking with your manager, you may email the Legal Department at legal@sycomp.com or submit a complaint through our internal compliance and ethics hotline at www.sycomp.ethicspoint.com or through a mobile device at sycompmobile.ethicspoint.com. Reports may be submitted anonymously if you wish to do so.

Non-Retaliation

Sycomp is committed to ensuring that any individual who raises a concern in good faith will not be retaliated against in any way. Acting in good faith means that any reports related to violations of this Code, internal company policies, or other law is made with sincerity and honesty. The outcome of the report is irrelevant, as long as the report is made in good faith, retaliation against the one making the complaint is strictly prohibited.

Investigations and Discipline

Sycomp is committed to investigating all reported noncompliance with this Code diligently, respectfully, and professionally. Any Sycomp employee who is asked to participate in an investigation has an obligation to cooperate fully.

Any violation of this Code, internal Sycomp policy or procedure, or applicable rule or regulation will be dealt with swiftly and seriously. The consequences of a violation may be significant, including and up to termination of employment.



Privacy

Sycomp prohibits employees from using its information or systems for any non-Sycomp business use. Users are strictly prohibited from transmitting any copyrighted, trademarked, or patented materials, technology, or know-how belonging to Sycomp, and are prohibited from revealing or publicizing confidential or restricted information, in the absence of appropriate permissions and controls.

Sycomp employees are expected to comply with all applicable privacy and data protection laws and regulations related to the collection, use, disclosure, destruction or otherwise processing of personal information

Conflicts of Interest

Sycomp is committed to identifying and avoiding all conflicts of interest. A conflict of interest may arise when there is an opportunity for some form of personal gain at the expense of the Company's best interest. If you are ever in a situation that raises concerns about an actual conflict, a potential conflict, or on that gives the appearance of a conflict you should immediately discuss the situation with your supervisor. The best way to minimize the effects of a conflict of interest are to identify potential conflicts early.

Gifts, Meals, and Entertainment

Sycomp's policy is that employees are not permitted to give or receive a gift unless the proper approvals have been made. If a gift is provided to an employee and it has been determined that the gift is not de minimus for tax purposes, the value of that gift will be taxable to the employee.

No employee should accept lavish gratuity or gifts from any customer, vendor, supplier, or other person doing business with the company, as this may be interpreted as influencing business decisions, transactions, or service. Branded items with a value of less than \$25.00 are acceptable to keep.

Anti-Bribery and Anti-Corruption

Sycomp is committed to conducting business in an honest and ethical manner. We take zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favor or a financial or other advantage from another to improperly influence a business outcome, to induce or reward improper conduct, or to gain any commercial, contractual, regulatory or personal advantage. Please refer to Sycomp's Anti-Bribery and Anti-Corruption Policy for additional guidance.

Global Trade and Antiboycott

As a global provider of IT software and services we conduct import and export transactions on a daily basis and are committed to complying with all applicable local, regional and international trade laws, rules and regulations.

Interactions with Government Officials

Sycomp imports products to countries around the world, and therefore, many Sycomp employees interact with foreign government officials and customs agents on a daily basis. It is the responsibility of each Sycomp employee to understand and comply with all local and global regulations relating to interactions with government officials. Please contact the Legal Department for approval before offering or providing any gifts, meals, or entertainment to anyone you know or think may be considered a government official. A government official can be a national or local government employee, a political candidate, a party official, a member of a royal family, or an employee of a government-controlled entity, such as a state-owned enterprise. For additional guidance please refer to the Anti-Bribery and Anti-Corruption Policy and consult with the Legal department.

Financial Integrity, Records, and Accounting

Sycomp is committed to honestly and accurately recording and reporting all business information and to complying with all applicable laws regarding their completion and accuracy. Sycomp employees are expected to create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements. Sycomp



requires all contracts, agreements, and financial information to be complete and accurate, with no “side deals” or “off book funds.”

Documents must be preserved for at least the minimum requirements under applicable law and Sycomp’s policy, and for longer in accordance with any accounting, litigation hold, or other requirements that may be in effect.

Document Retention and Management

All employees are required to abide by all relevant document management and retention rules and regulations, wherever we do business. When determining what documents to save, archive, or trash, always refer the Document Retention Policy and relevant procedures.

Outside Audits and Investigations

Occasionally you may be asked to participate in an investigation by internal and external auditors, attorneys, or investigators who need information from you on behalf of Sycomp related to an internal investigation. All employees are required to fully cooperate with these individual and provide them with complete and accurate information.

Diversity and Non-Discrimination

Sycomp is committed to maintaining a diverse and inclusive workplace. Diversity of opinion, experience, background help the Company to push forward and develop innovative solutions for our customers. Accordingly, employment decisions are never based on any legally protected personal characteristics. Sycomp prohibits unlawful discrimination based on race, color, gender (including gender identity and gender expression), religion (all aspects of religious beliefs, observance or practice, including religious dress or grooming practices) marital status, registered domestic partner status, age, national origin (includes language use and possession of a driver’s license issued to persons unable to prove their presence in the United States is authorized under federal law), ancestry, physical or mental disability, medical condition (including cancer or a record or history of cancer, and genetic characteristics), sex (including pregnancy, childbirth, breastfeeding or related medical condition), genetic information, sexual orientation, military and veteran status, or any other consideration made unlawful by federal, state, or local laws. It also prohibits unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.

Security and Workplace Violence

Sycomp has developed guidelines to help maintain a secure workplace. Be aware of persons loitering for no apparent reason in parking areas, walkways, entrances and exits, and service areas. It is the employee’s responsibility to report any and all suspicious persons or activities to your manager. Secure your desk or office at the end of the day. When called away from your work area for an extended length of time, do not leave valuable and/or personal articles in or around your workstation that may be accessible. The security of the facilities as well as the welfare of our employees depends upon the alertness and sensitivity of every individual to potential security risks. You should immediately notify your manager when unknown persons are acting in a suspicious manner in or around the facilities, or when keys, security passes, or identification badges are missing.

Sycomp has a “zero tolerance” for any expressed or implied threats among employees. Employees who threaten, initiate, become involved in, or assist others in violence in or out of the workplace will face disciplinary action up to and including termination from Sycomp.

Media Relations

Occasionally, employees may be approached for interviews or comments by the news media. Only individuals designated by Sycomp to communicate with the press are permitted comment on Company policy or events that have an impact on Sycomp. All media contacts or inquiries should be directed to the Legal department at legal@sycomp.com.



Social Media

For the purposes of this policy, social media includes but is not limited to all means of communicating or posting information of any sort on the Internet. This includes to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with the company, as well as any other form of electronic communication. You are solely responsible for what you post online.

We advise our employees to:

- **Use common sense.** If employees neglect their job duties to spend time on social media, their decline in productivity will show on their performance reviews.
- **Ensure others know that their personal accounts or statements don't represent Sycomp.** Employees shouldn't state or imply that their personal opinions and content are authorized or endorsed by our company. We advise using a disclaimer such as "opinions are my own" to avoid misunderstandings.
- **Avoid sharing intellectual property** like trademarks on a personal account without approval. Confidentiality policies and laws always apply.
- **Avoid any defamatory, offensive or derogatory content.** It may be considered as a violation of our company's anti-harassment policy, if directed towards colleagues, clients or partners.