

# Our Code of Conduct

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# Introduction



At Strada, we are dedicated to helping our customers and their employees stay ahead. We believe that what drives a company forward is its people. Our team of more than 8,000 professionals expertly deliver payroll, human capital management, and financial management solutions to more than 1,400 customers across 33 countries.

Every customer interaction is guided by our Code of Conduct, which sets the standards and values for our dealings with customers, partners, and each other. The creation of this new Code of Conduct reflects our commitment to continuous innovation, customer excellence and embodies our “forward as one” mantra.

All Strada colleagues must review the Code of Conduct, as it provides guidance for decision-making in challenging situations and an overview of the resources available to support you. Acting with integrity, honesty, and a steadfast commitment to ‘doing the right thing’ will help maintain Strada’s reputable position on the road ahead.

Thank you for your support and dedication to serving our customers.

**Colin Brennan, Chief Executive Officer**

# Making Ethical Decision – What are my responsibilities?

Our Code of Conduct helps us to make ethical business decisions when conducting Strada business. However, it is not designed to address every issue. You may face a situation where the right course of action is unclear.

## How to ask a question or report an issue?

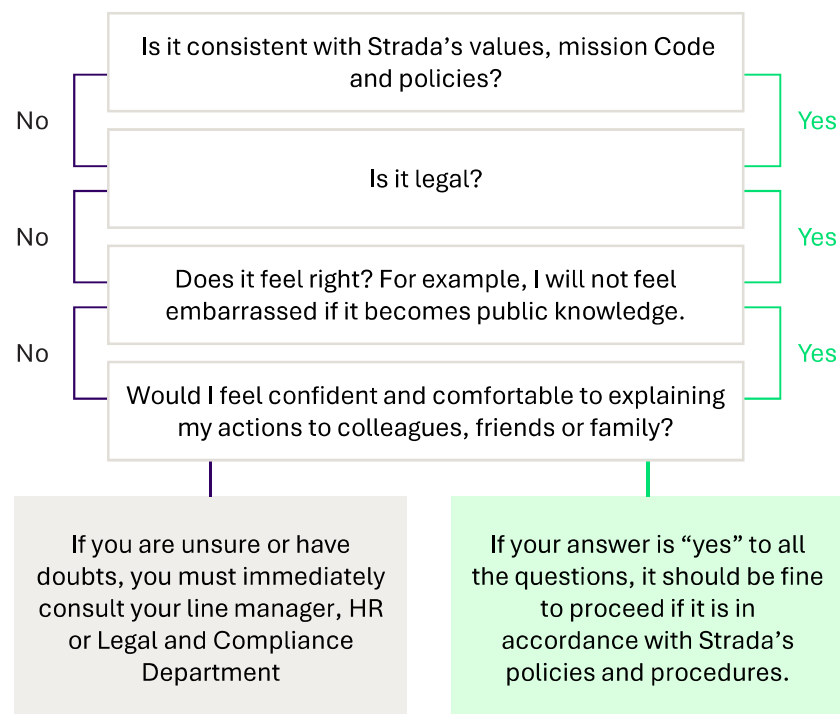
If you need help deciding how to handle a particular situation at work, need to report a situation or need support in doing the right thing, the first place you should turn is your line manager. If you do not feel comfortable doing so, contact the Ethics Helpline or any of the other resources listed in this Code.

## Everyone's responsibility

Compliance is the responsibility of each of us and should be top of minds as we interact with colleagues, clients, business partners, and conduct our daily business activities. It is critical that our Compliance Program is effectively understood and communicated throughout all levels of the organization.



**Ethical Decision-making tree:** Ask yourself the following questions when you are faced with a difficult situation and are unsure of what to do and think carefully about your actions.





### What are my obligations?

- When engaged in a business activity related to Strada, colleagues and partners are required to follow the rules and guidance in this Code of Conduct and colleagues must certify annually that they have reviewed and understood the Code requirements.
- Given that many provisions of this Code and Strada's policies are based on legal and regulatory requirements, violations can subject individuals or Strada to fines, penalties and even criminal or civil sanctions. Those violations may also severely damage Strada's reputation.

### Business or region-specific policies

- Some business units or regions may have additional compliance-related policies or procedures, referenced within the global policies, that are **stricter** than this Code. Always follow the stricter requirements. In all cases, colleague conduct must never fall short of the principles in our Code.

### Leading by example: a manager's role

Managers should serve as role models by:

- Setting the right tone;
- Creating an open and inclusive environment where people feel empowered and safe to ask questions, make suggestions or raise concerns without fear of negative treatment or retaliation; and
- Demonstrating conduct that is consistent with the Code and Strada's policies and procedures.

### Who must follow the code?

Strada's Code of Conduct and policies and procedures apply to all:

- Strada colleagues
- Officers and Directors
- Contractors and Subcontractors (as appropriate)
- Agents, affiliates, partners or third parties representing Strada.



## Speaking up and reporting

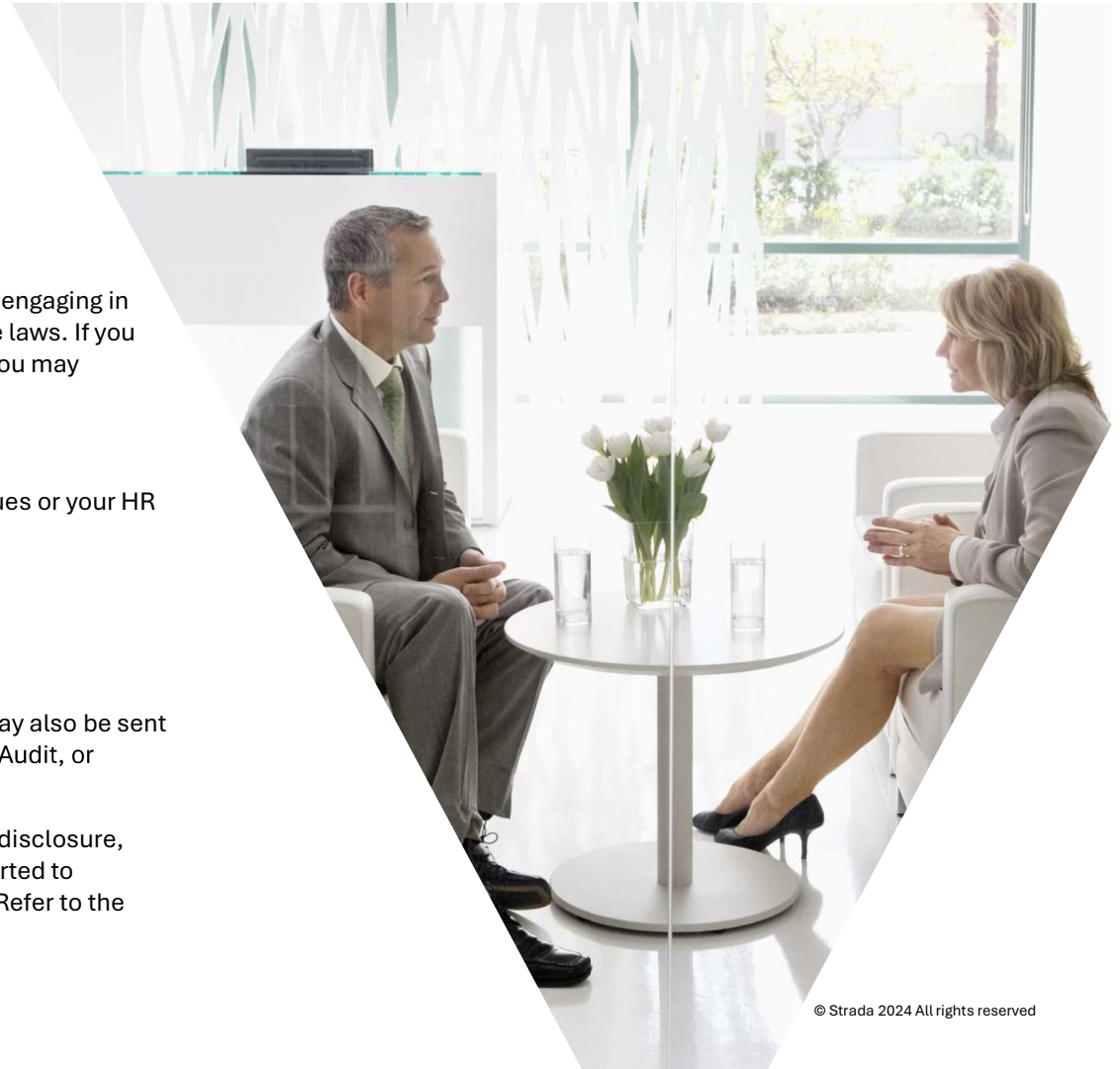
### What if I see a violation?

You must take action if you are aware of, or suspect people are engaging in behaviour that violates this Code, Strada policies, or applicable laws. If you are aware of unethical or illegal conduct, it must be reported. You may contact:

- Your manager.
- HR Connect at HR Connect Form for North America colleagues or your HR representative for colleagues outside of North America.
- The Strada Ethics Helpline at [strada.ethicspoint.com](https://strada.ethicspoint.com).
- The Legal and Compliance Department at [stradacompliance@stradaglobal.com](mailto:stradacompliance@stradaglobal.com)

Concerns regarding potential accounting or auditing matters may also be sent directly to Strada's Chief Legal Officer; Vice President, Internal Audit, or otherwise as directed in Strada's Whistleblower Policy.

Concerns regarding suspected or actual unauthorized access, disclosure, loss of or damage to data or personal information must be reported to Strada's Ethics Helpline or the Strada Response Center (SRC). Refer to the Resources section for contact information.





## Speaking up and reporting

**Strada takes all allegations of improper conduct by Strada, its employees or its partners seriously and will investigate promptly.**

Colleagues are expected to cooperate fully with any investigations. Interfering or providing false information in the course of an investigation is a violation of the Code.

### No retaliation

Strada does not tolerate retaliation or intimidation against anyone who reports a concern or complaint, cooperates with an investigation or refuses to do something that violates our Code, policies or the law.

You must not submit a false report, i.e., a report which is not true or is misleading. This can be considered a serious matter that may result in disciplinary action and have potential legal consequences.

Strada's Ethics Helpline is operated by an independent, third-party provider which maintains the confidentiality of calls.

Those who contact the Ethics Helpline can remain **anonymous**, if they choose, where permitted by local law.

Colleagues who provide their names will have their identities protected to the extent consistent with Strada's need to investigate and to take appropriate corrective action

You will find the Helpline phone numbers for your area, along with an online reporting system in the Resources section and at: [www.strada.ethicspoint.com](http://www.strada.ethicspoint.com)





## Speaking up and reporting

### Where do I go for assistance?

#### Strada's Ethics Helpline

Strada's Ethics Helpline is a way for colleagues to seek guidance on legal or compliance matters, or to report possible violations of the Code, Strada policies, or procedures or the law.

#### Cooperating with investigations

Information provided to Strada about potential violations of the law or policies will be treated confidentially to the extent permitted by law. If an investigation is needed, it will be handled by appropriate Strada personnel.

When necessary, we will report conduct that appears to be criminal in nature to the appropriate authorities, and we will cooperate with any resulting investigation.



# Valuing our people, communities and the environment



## Respect in the workplace

At Strada, we have an unwavering belief that a company's success starts with its people, and our solutions connect human insights with technology. We are committed to creating a sense of belonging in the workplace, and to making Strada a place where all colleagues can feel happy and fulfilled while serving our clients and their people with excellence.

Strada colleagues are expected to foster and protect a culture of mutual appreciation and respect. At Strada, we do not tolerate harassment or discrimination of any kind, including behaviour that is disrespectful, abusive, or humiliating on the basis of gender, race, ethnicity, religion, sexual orientation, gender identity, national origin, age, disability, pregnancy, veteran status, marital, or domestic partner status or any other status protected by law.

We believe that diversity, equity, and inclusion should be valued and sustained throughout the organization. We create an inclusive environment that nurtures the unique background, skills and creativity that each of our colleagues brings to the organization. We provide equal treatment without regard to any protected status or characteristic in all aspects of Strada's employment decisions, including:

- Recruitment and hiring
- Promotion and performance management
- Development and training
- Benefits and compensation
- Termination of employment

### Definitions:

**Harassment:** Belittling or humiliating subordinates or other colleagues; bullying behaviour; derogatory comments, insults, and jokes that target a certain protected status group.

**Sexual harassment:** When one person subjects another to unwelcome sexual advances or engages in other unwelcome sexually-related conduct (such as sharing lewd images or making lewd remarks). Creating an intimidating, hostile or offensive working environment (such as sending sexually-oriented emails at work) is also considered sexual harassment.

# Respect in the workplace

## Our ask of you

1

Always speak to and treat others in a **civil, professional manner.**

2

**Think first.**

Do not communicate a joke or comment or take any action which might be viewed as threatening, offensive, derogatory, disrespectful, or insulting. What may seem funny or harmless to some people may be hurtful or degrading to others.

3

**Don't tolerate harassment.**

Colleagues should always be able to work in a respectful environment, free from behaviour that creates hostile or offensive working conditions. If you experience or observe harassment or discrimination, report it immediately. Complaints of harassment or discrimination can be reported to a manager, to Human Resources or anonymously via the Ethics Helpline. Although all colleagues should report any incidents of harassment or discrimination that they witness or experience, managers and supervisors must report to HR all harassment and discrimination complaints (both formal and informal) they receive.

## Questions and Answers

**What if I am unsure if the behaviour, I received meets the definition of harassment or discrimination?**

You should report the behaviour to your manager, Human Resource, or the Ethics Helpline even if you are unsure if it is harassment or discrimination as we take all reports of potential misconduct seriously.

**Can I report violations anonymously?**

Yes, violations can be reported anonymously using the Ethics Helpline.

**To learn more:** Please log on to Strada HR Portal for policies, including Strada's Inclusion and Diversity Policy.



## Maintaining a safe and healthy workplace

**We are committed to providing a safe and healthy work environment for all colleagues.** Strada does not tolerate workplace violence. To help maintain a safe work environment for all colleagues, no colleague may use or possess weapons, including firearms, at any time while on Strada premises or while conducting business on behalf of Strada. Words and actions that are intimidating or

threatening are also prohibited. The use of illegal drugs and alcohol and the misuse of prescribed and over-the-counter drugs in the workplace or while performing work for Strada will not be tolerated as it subjects our colleagues, clients, and visitors to unacceptable safety risks that undermine Strada's ability to operate safely, effectively, and efficiently.

**Where can I get more information on local workplace safety policies or standards?**

You can contact your manager or local HR for more information on local workplace safety policies or standards.

### Our ask of you

1

Follow all applicable health and safety laws and regulations for the facility where you work.

2

Promptly report accidents, environmental concerns or dangerous situations to your manager, HR representative, Ethics Helpline.

3

Contact your manager, HR if you witness or experience any threatened or actual violence in the workplace. Immediately contact local emergency services if you or others are facing imminent danger.

**To learn more:** Global Workplace Security and Safety Policy

# ESG (Environmental, Social and Governance)

## Our Global Commitment

We believe that businesses have an ethical responsibility to do all they can to ensure a thriving, sustainable world.

We strive to strengthen and enhance our ESG strategy to reflect our commitment to concrete implementation of a path of integration of sustainability principles into our activities, to be aligned with the Sustainable Development Goals 2030 agenda of the United Nations, and, using the OECD Guidance for Responsible Business Conduct – which seeks to align with the UN Guiding Principles on Business and Human Rights amongst other relevant principles and regulations.

We aim to support the people and resources that we can affect both directly and indirectly in our roles as Strada colleagues, and as global citizens. We act as

responsible citizens in the communities in which we operate and strive to utilize resources as efficiently as possible.

Strada is committed to international employment standards and seeks to address the full spectrum of internationally recognized human rights, ranging from workplace concerns to issues affecting communities.

We recognise that fully embedding sustainability and ESG into our decision making and delivering improvements over the longer term might take some time of collaborative and aligned effort. However, we are fully committed to the steady progress towards a robust program and continuous improvement.

### Our ask of you

1

Support ESG. Understand Strada's ESG areas of focus and consider how you can contribute to or support those efforts.

2

Respect human rights. Demonstrating respect for human rights begins with our daily interactions with one another and with our business partners. It includes promoting diversity and inclusion, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business. All colleagues must report any suspicion or evidence of human rights violations, whether in our operations or in those of our business partners.

3

Be proactive and look for ways to minimize Strada's environmental footprint by reducing, reusing, and recycling waste and by using energy and water more efficiently.

4

Speak up if you have ideas about how to improve the environment.

To learn more: [Environmental Policy](#)



# Doing business with integrity



## Anti-bribery laws

### We do not tolerate bribery or corruption.

Strada is fully committed to compliance with anti-bribery and anti-corruption laws in all countries where Strada operates. These laws include the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, U.S. fraud statutes, state laws and similar international rules.

The laws prohibit improper payments, such as bribes or promises to make improper payments, whether or not the offer is successful.

Improper payments are illegal and against Strada policy, whether the conduct is engaged in by Strada colleagues or by any third party (such as a consultant, agent, lobbyist or partner) acting on Strada's behalf. We also prohibit facilitation payments given to unofficially speed up or secure routine government processes such as to obtain permit or license.

At Strada, we only do business with companies or individuals who conform to our high ethical standards. Colleagues should select business partners carefully.

### Definitions:

**Bribe:** Anything of value that is given to influence the behaviour of someone in government or in the private sector with the purpose of obtaining an improper business, financial, or commercial advantage.

A bribe can involve promises or payments of cash or future business, as well as gifts, travel expenses, entertainment, offers of employment and charitable contributions.

**Government official:** Anyone who works for, or is an agent of, a government-owned or government-controlled entity. This includes elected and appointed officials of national, municipal, or local governments. It also includes officials of political parties and candidates for political offices, as well as employees of a government- or a state-controlled company.



## Anti-bribery laws

### Our ask of you

1

Do not offer, give, or accept bribes, or accept or provide any other kind of improper payment. Avoid even the appearance of making business decisions based on improper payments.

2

Never use a third party to perform an act (such as paying money or giving anything of value) that you, as a colleague, would be prohibited from engaging in directly.

3

All third parties acting on Strada's behalf in connection with Strada obtaining or retaining business must be reviewed via the Third-Party Approval Process and must agree to comply with Strada's Anti-Corruption/Anti-Bribery Policy and applicable anti-bribery laws.

### Questions and Answers

Recently, I had a lunch with a former colleague who now works at a government agency. He mentioned that they are preparing to launch an RFP for selecting a new payroll service provider and said that an internship for his newly graduated son might help 'strengthen Strada's relationship' with the agency. His son is qualified for an intern position — may I put in a good word with HR to give Strada the advantage in the RFP?

You should report the request to your manager, or another resource provided in this Code. Providing someone with employment — even an intern position — qualifies as a benefit and must not be given in order to gain a business advantage. As we must avoid even the appearance of improper influence, the consideration of the newly graduated son as an intern must be reviewed by Legal.

To learn more:  
Anti-Corruption/  
Anti-Bribery Policy  
Third Party Review  
Policy

## Accepting and giving gifts and entertainment

Gifts and entertainment should never be used to influence a decision, nor should they be considered just part of “doing business.” Some countries where Strada operates impose restrictions on paying for or offering anything of value — such as meals, entertainment, or gifts — to business partners and, specifically, to government officials.

Colleagues may give and accept business courtesies to the extent permitted by law and by Strada’s business specific policies. Such courtesies must be within policy limits and modest enough to not

interfere with ethical business judgment nor create an appearance of impropriety.

In general, the giving and acceptance of lodging and travel expenses is prohibited. Giving or accepting gifts of cash and cash equivalents (e.g., prepaid debit cards, cryptocurrency, traveller’s checks) are prohibited. More information about what is permissible, when approval is required and how to obtain it, and what is prohibited can be found in the Non-Employee Entertainment and Gifts Policy, and the Gift Acceptance Policy.

### Our ask of you

1

Understand and comply with the restrictions and approval requirements around providing gifts and entertainment to business partners and to government officials. This includes checking whether your business and/or geography/region has a local policy to govern gift and entertainment activity.

2

When offered a gift, obtain pre-approval for anything exceeding (\$, €, £) 50. Obtain additional pre-approval from Legal before accepting anything of value exceeding (\$, €, £) 100

3

Record all expenses accurately in Strada’s books and attach supporting documentation

4

**Never** exchange gifts or entertainment to improperly influence the recipient to misuse his or her position to obtain an advantage in a bidding process.

To learn more: [Non-Employee Entertainment and Gifts Policy](#) | [Gift Acceptance Policy](#)



# Interactions with government officials:

## The government as a business partner

### The government as a business partner

Particular vigilance is required when interacting with government officials. Special legal and contracting rules apply to our dealings with governments. These include bidding or procurement requirements, stringent restrictions on gifts, travel and entertainment, special billing and accounting rules, and restrictions on subcontractors or agents. Failure to comply with these standards could result in significant and, in some cases criminal, penalties.

### Political Activity

Strada does not currently participate in a Political Action Committee (PAC) or otherwise make any political contributions. Strada colleagues may make personal contributions to causes of their choice. Colleagues are free to participate in personal political activities, but your involvement must be on an individual basis, on your own time and at your own expense.

## Interactions with government officials

### Our ask of you

1

Contact Legal and Compliance prior to engaging any government officials or entities as a business partner.

2

Understand and follow the restrictions around gifts and interactions with government officials.

3

Immediately notify Legal and Compliance of any request made by a government official for a payment, other than legitimate taxes or fees.

4

Do not use Strada's assets or resources for political activities.

5

Never pressure others to contribute to, support, or oppose any cause, political candidate, or party, and do not solicit contributions or distribute political literature during work hours.

### Questions and Answers

**I went to a fundraising dinner for a candidate for a local government office. This candidate takes positions favourable to our interests, so can I claim the dinner on my expense report?**

No. If you did this, it would be considered a political contribution from Strada, which would violate our policies. While you are free to attend political fundraising events as an individual, you must not use company assets or funds or give the impression that you are representing Strada.

**To learn more:**  
Non-Employee  
Entertainment and  
Gifts Policy

## Charitable donations

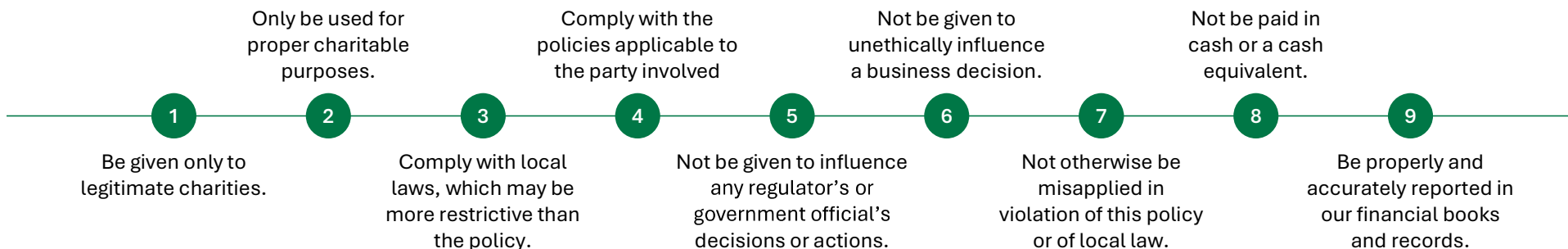
Strada is committed to the communities in which it does business and encourages reasonable and appropriate corporate donations to charities.

Donations to charitable organizations may present a risk that funds will be diverted to or benefit individual government officials or otherwise constitute bribery.

Decisions to make corporate donations to charities or government agencies (other than those made by you in your personal capacity) will be made by leadership and consistent with company policies. These donation requests include direct grants to non-profit organizations and donations in support of charity events (e.g., fund-raising dinners, golf outings).

### Our ask of you:

When proposing a charitable initiative or donation, remember that such activity by Strada must



Contact Compliance for more information or questions about charitable donations



## Conducting international business: International trade restrictions

### We comply with international trade controls and economic sanctions.

Strada complies with U.S., UK and EU and other local trade restriction laws and regulations, including economic sanctions, applicable import/export rules and anti-boycott activities. Economic sanctions, including those set forth by the Office of Foreign Asset Control (OFAC), can limit or restrict Strada's activities with:

- Certain countries and their governments, including entities owned or controlled by such governments.
- Certain restricted persons, including individuals or entities that are considered problematic for foreign policy or national security reasons.

Strada also complies with the U.S. anti-boycott laws, which penalize U.S. companies & their non-U.S. affiliates for cooperating with or furthering international boycotts in which the U.S. does not participate (such as the Arab League Boycott against Israel).

If the laws in your country prohibit complying with certain trade controls and economic sanctions such as US, UK or EU, and a transaction arises that raises a conflict between the relevant law, you should consult with Compliance by contacting [stradacompliance@stradaglobal.com](mailto:stradacompliance@stradaglobal.com)

### Financial crime, anti-money laundering and anti-terrorism laws

Strada complies with the financial crime, anti-money laundering and anti-terrorism laws in all jurisdictions where it does business.

Strada will conduct business only with reputable parties that are engaged in legitimate business activities with funds derived from legitimate sources. Strada cannot accept funds known to be derived from illegal activities.

Persons involved in criminal activities, such as drug trafficking, corruption or terrorist activities may try to launder their funds through legitimate activities. We must be vigilant against suspicious activity.

## Conducting international business: Our ask of you

1

Understand and follow the law and our policies. If you are involved in international business transactions, it is especially important that you know and comply with the requirements associated with the countries in which you do business. Trade regulations are complex and dynamic; if you have any questions, contact [stradacompliance@stradaglobal.com](mailto:stradacompliance@stradaglobal.com)

2

Complete third-party due diligence to confirm the identity of relevant parties and make sure sanctions screening is complete before entering into new business relationships.

3

Be alert to suspicious activities. Watch for any suspicious payments, which may include paying in cash, payments made from personal accounts instead of business accounts, and transactions with financial institutions or third parties without a logical relationship to the customer or business partner. If you encounter a situation that makes you question the legitimacy of someone with whom you are doing business, raise the issue with the Legal and Compliance Department.

### Money laundering red flags include

- Insufficient or suspicious information or mismatched company names.
- Requests to receive funds into or from multiple bank accounts or through a third party.
- Requests to pay or receive funds into an offshore bank account.
- Large cash payments.
- Use of cryptocurrencies.

### Questions and Answers

**A supplier has asked that we send payments to a new address outside the country of business. I am suspicious that there might be something illegal or inappropriate going on. What should I do?**

You are right to be suspicious. This may be an effort to launder money or to otherwise avoid legal requirements. You should contact Legal or Compliance without delay. If possible, until you hear otherwise, do not have any further discussions with the supplier about the request.

**To learn more:  
Global Trade  
Restrictions Policy**

## Avoid conflicts

**At Strada, we act with integrity and avoid conflicts that may prevent us from acting in the best interest of our clients or our company.**

A conflict of interest may occur when your personal interests affect your ability to make objective decisions on behalf of Strada.

Colleagues may not take Strada business opportunities as their own or use Strada's property, information or position for personal gain or to compete with Strada.

Additionally, colleagues must never be in the position of supervising, reviewing or having any influence on employment decisions of any close relative or a person with whom they have a close personal relationship

### Definitions:

A **business conflict of interest** may arise when Strada's interest differs from the interest of a client, prospect or business partner, or where Strada cannot act in the best interest of one client without adversely affecting another.

A **personal conflict of interest** may arise for a colleague who engages in business activities outside of Strada, has a personal interest which conflicts with Strada's or has employment-related decision authority for a colleague with whom they have a close personal relationship.



## Avoid conflicts

### Our ask of you

1

Recognize and avoid the risk of a conflict by taking steps to ensure that you will not make any decision, or engage in any activity, that may adversely affect Strada, Strada's relationship with a business partner or cause a conflict between you and Strada.

2

Reduce the risk of a conflict by, for example, having another colleague perform work that you should not perform because of a potential conflict.

3

Disclose an actual or potential conflict of interest to your manager and the Compliance via the Conflict of Interest Disclosure Form.

4

Maintain records of any actual or potential conflicts, including any mitigating action taken to address them.

### Questions and Answers

**My coworker's brother just joined our business team. Is this allowed?**

It may be allowed, but more information is needed. While relatives can work in the same team or operating unit, a colleague must never be in a position to hire, supervise, or influence the management of a relative.

**To learn more:**  
**Conflicts of Interest Policy**

## Fair dealing and marketing practices

We compete fairly in the marketplace, abide by fair competition and antitrust laws, and deal fairly with clients, suppliers, partners and competitors.

Strada does not gain business advantages through abuse of confidential information or by means of any other unfair practice.

We do not misrepresent material facts or allow our independent judgment to be compromised.

### Our ask of you

1

Never use, copy or give confidential or proprietary market information to competitors. If you happen to obtain such information about a competitor, safeguard it and contact Legal immediately.

2a

#### Be careful when communicating or meeting with competitors. Do not:

Discuss fees or other aspects of Strada's pricing or compensation with competitors.

2b

Discuss or agree with competitors to restrict the types of products or services offered by Strada.

2c

Disclose confidential or misleading information about Strada.

2d

Seek or accept inappropriate or confidential information to which Strada should not have access

### Questions and Answers

**I serve as Strada's representative with a key trade association. What am I able to discuss during our meetings and how do I know whether the discussions of others at the meeting may violate antitrust and competition laws?**

While trade associations provide an excellent forum to stay informed, member meetings that bring together competitors can present antitrust risk. Before the meeting, discuss your concerns with Legal. Review the agenda to determine who might be there and what topics may come up. When you are at the meeting, stick to the agenda & limit your interaction with competitors. If the discussion turns to potentially inappropriate topics, stop the conversation, break away, and promptly inform Strada's Legal & Compliance Department.

To learn more:

Fair  
Competition/  
Antitrust  
Policy

## Inside Information

While working at Strada you may have access or become aware of inside information about other companies we do business with which is not known to the public.

Using or sharing inside information for financial or other personal benefit is called 'insider trading'. You must not engage in insider trading. It is illegal, unfair and affects the trust we have built with our clients, shareholders and the public.

### What is inside information?

**Inside information:** Any non-publicly available information that would reasonably be expected to affect the price of a security or that would influence an investor's decision. Examples of inside information include:

- Financial results and forecasts
- Possible mergers, acquisitions or dispositions
- Knowledge of important product developments
- Changes in senior management.

# Inside Information

## Our ask of you

1

Never buy or sell another company's stock if you have inside information that could influence the price of the stock.

2

Use caution when discussing inside information in public, even if only speaking directly to other insiders. If others could be within ear shot, then inside information can leak and cause market movement.

3

Do not "tip" others. Never disclose material, non-public information about a company to someone else, including to your broker, family or friends.

## Questions and Answers

When planning to buy stock in a client company, you overheard some colleagues discussing a confidential acquisition regarding that company. You could not hear all the details, but you think this might impact the stock price. Can you go ahead with the trade?

No. Since you now have non-public (inside) information about the client's acquisition plans, you must not buy stock and must not disclose the information to anyone else.

To learn more:  
Global Inside Information Policy

# Protect and Safeguard our assets and information



## Proper use of Strada's property

Strada's brand is fundamental to its reputation and its business. Further, Strada's assets are only to be used for authorized business. This includes Strada's physical (equipment, tools), informational (personal, company, client or vendor data), financial (funds and financial records), and electronic (devices and technology systems) assets.

They are not to be used for personal purposes or in support of a non-Strada business or activity or in violation of any applicable law or regulation.

Some assets, such as mobile phones or computers, may be used for limited personal purposes in accordance with Strada policies, provided such use is appropriate, minimal and does not interfere with job performance or puts Strada's assets at risk.

Colleagues should be aware that they may be monitored when using Strada assets, including computers, mobile devices and email. As permitted by law, Strada reserves the right to monitor, intercept and review communications made using Strada's assets.

### Our ask of you

**1**

Safeguard all firm assets from loss by theft, carelessness, misuse or waste.

**2**

Follow Strada's expense policies. Do not engage in the falsification of records or misrepresentation when handling of assets or financial records.

**3**

Report suspected incidents of theft or misuse of our assets.

**4**

Comply with Strada's brand standards for all Strada-branded internal and external communications.

**5**

Protect informational assets by understanding and complying with Strada's policies on information, confidentiality, and security, discussed in the next section.

### Questions and Answers

#### What do I do if I leave my mobile phone or laptop on an airplane?

Contact the Strada Response Center immediately at [SRC@stradaglobal.com](mailto:SRC@stradaglobal.com) or the following number: +1 443 926 0526.

**To learn more:**  
**Mobile Computing Standard**  
**Global Acceptable Use Policy**

## Information confidentiality, privacy and security

Strada is committed to protecting the personal and sensitive information it receives from business partners, clients, vendors, consultants, colleagues, and other service providers.

Strada complies with all applicable privacy and data protection laws in the jurisdictions in which Strada conducts business and follows the direction of our clients when processing their personal information, as defined in contracts. Strada policies classify information as Restricted, Confidential, Internal Use, or Public and outline processes governing the use of each type of data (see To learn more section on next page).

Information that identifies a person requires extra care. Strada processes personal information in accordance with the following privacy and data protection principles:

- Notice and transparency: Personal information should be processed lawfully, fairly, and transparently.
- Purpose limitation: Personal information should be processed for specific reason(s) only.
- Data minimization: Collection of personal information should be limited to what is necessary to the stated purpose of processing

- Data quality and accuracy: Personal information should be kept confidential and secure and should be up-to-date and accurate.
- Individual rights: Individuals should have the opportunity to access and correct their personal Information; and
- Storage limitation: Personal information should be processed for a limited period of time.

**Colleagues must maintain the confidentiality, privacy and security of personal data or other sensitive information about Strada, our clients and our business partners.**

Colleagues may learn information about the company that is not known to the general public or to competitors. Your knowledge of such information places you in a special position of trust. Breaching that trust may expose Strada and you to civil and criminal penalties.

Colleagues must access and share information with colleagues and third parties based on business need and in accordance with policies and applicable laws.

# Information confidentiality, privacy and security

## Our ask of you

1

Never conduct Strada business using your personal email or send Strada client data, or intellectual property, or other proprietary and confidential information/ data to a personal email account.

2

Only disclose personal information to specifically authorized Strada personnel who have a need-to-know to fulfil their job responsibilities, Adhere to Strada's Global Privacy Policy in addition to the applicable local Privacy Policies.

3

Encrypt personal data and confidential data that is transmitted outside of Strada's custody.

4

Immediately report incidents involving suspected or actual unauthorized access, disclosure, alteration or loss of data or personal information by contacting [Strada's Response Center \(SRC\)](#) or the Ethics Helpline.

5

Never:

- Discuss sensitive business or client information in places where others may overhear, such as in the elevator, on a bus or in a restaurant.
- Store or transmit Strada or client data on personally-owned devices unless you are using an Strada-approved application and have confirmed the data on the device is encrypted.
- Share your account information or use anyone else's account or a shared account to access Strada systems.

### Questions and Answers

**Due to urgency, a client contact asks me to send confidential information to the client contact's personal email account. Should I comply with the request?**

Prior to complying with the request, you must verify that: (1) Sending the requested confidential information to a personal email account does not violate any security processes established by Strada or by the client; and (2) The client contact is authorized, based on job-related function, to have access to the confidential information requested. Once verified, you can send the requested information in a password protected file through an approved secured method to the client contact.

**Is it OK if I share Strada confidential information with people I really trust, but that do not work at Strada?**

No. Strada confidential information can only be shared with people who have a business need-to-know (based on job function) and are approved or authorized to have access to such information. If unsure, you should consult with your supervisor or the Strada Privacy Office before sharing information with anyone.

**Can I comment on my client's confidential information with my colleagues?**

Client confidential information can only be shared with people who have a need-to-know based on their job-related function. That applies to all Strada colleagues, vendors, partners, and other third parties.

**To learn more:**  
[Global Privacy Policy](#)  
[Global Information Classification Policy](#)



## Accuracy and retention of business records

Compliance with records management practices supports efficient business operations, preservation of corporate memory, and compliance with relevant legal and regulatory requirements.

The Strada Global Records Management Policy establishes Strada's rules regarding records management processes across Strada. This includes the creation, storage, access, use, and

secure disposal of corporate information, including, but not limited to, business records.

All colleagues are responsible for ensuring that business records are properly identified, retained, protected and disposed of in accordance with legal requirements and Strada's Global Records Management Policy and associated standards.

### Our ask of you

1

Retain and protect business records for the applicable record-retention period.

2

Preserve and protect business records as directed by the Legal Department in connection with a litigation or investigation.

3

Properly and promptly dispose of business records for which retention is no longer necessary for legal or business reasons & not otherwise required under Strada policy.

### Questions and Answers

I was provided a new Strada work laptop. My previous laptop has business related information and communication from the last few years. Do I need to do anything to preserve this data, or can I send the old computer to be wiped?

This information might need to be preserved, depending on what it is. Check the Policy or consult with the Legal Department if you aren't sure whether the data should be preserved.

**To learn more:**  
Global Records  
Management  
Policy

# Represent Strada responsibly





## Media contact

**We must accurately and clearly represent Strada in the media in all circumstances to protect our company and our brand.**

To make this possible, only those colleagues expressly authorized to represent Strada are allowed to communicate on Strada's behalf.

Strada requires a member of Strada's Marketing team to serve as the main point-of-contact with the media.

All media requests should be forwarded to Corporate Communications.

### Social Media

Strada recognizes that social media can be a useful means of marketing, enhancing business relationships, and promoting our culture, brand and thought leadership.

Colleagues must apply thoughtful rationale to their social media posts, following the Code of Conduct and Strada's Global/ Social Media Policy and Participation Guidelines.

Colleagues identifying themselves as Strada employees on personal social media must remember that any statements, they make on social media reflect the Strada brand.

If you are discussing Strada or our services, be clear about who you are, your relationship to Strada, and that you are expressing your personal opinion.

Failure to properly adhere to Strada values, policies and legal requirements may adversely affect your employment, assignment, or contract, as applicable. Use your best judgment before posting or sending something online.

Liking, sharing and re-posting approved Strada content is encouraged.





## Media contact

### Our ask of you

1

Do not communicate on behalf of Strada unless you have been expressly authorized to do so by Strada's PR or Corporate Communications team. If you are contacted by a member of the media, please forward the request, or alert Corporate Communications.

2

Protect all sensitive and proprietary information from unauthorized access, use or disclosure. Our commitment to protecting sensitive and confidential information regarding Strada, our customers, our workforce members, our business partners and others applies online. Never post content or a photo containing confidential company information without approval.

3

Do not post client and partner logos via social media personal profiles, as a Strada employee, without prior client/Legal approval.

### Questions and Answers

**Can I post photos of our Strada office holiday party on my personal social media account?**

Yes, however, it is important to review the photo closely to ensure there is no confidential information displayed in the photo (e.g., information on a whiteboard or confidential documents on a desk in the background).

**Can I identify myself as a Strada colleague on my personal (non-professional) social media accounts?**

Yes, however, you must disclaim that views and opinions are your own.

**To learn more:**  
Social Media Policy  
and Participation  
Guidelines

## Corporate authority

Only make commitments you are authorized to make. Business units have guidelines that outline the authority of colleagues to make commitments (e.g., entering into contracts) on Strada's behalf.

If you are unsure who can make commitments on behalf of Strada, contact Legal.

Lawsuits, Claims and Government Inquiries Legal is responsible for managing Strada's liability risks, litigation and claims. Legal is solely responsible for hiring outside lawyers for Strada work and for coordinating responses to requests for information from government agencies or in connection with legal matters.

### Our ask of you

1

Contact the Legal Department if you receive a request for information from a government official, administrative agency, court or a non-government or private party such as subpoenas requesting documents or testimony, letters or calls from attorneys or any other non-routine request for information.

2

Contact Legal if you are notified of any lawsuit, arbitration or other adversarial proceeding involving Strada or any of Strada's affiliates or subsidiaries.

3

Report any claims or incidents which might give rise to a claim to Legal through established reporting procedures.

4

Never alter, falsify, or conceal records or documents relevant to legal matters including litigation, arbitration, any adversarial proceeding or investigation.

# Additional Resources







## Strada's Ethics Helpline

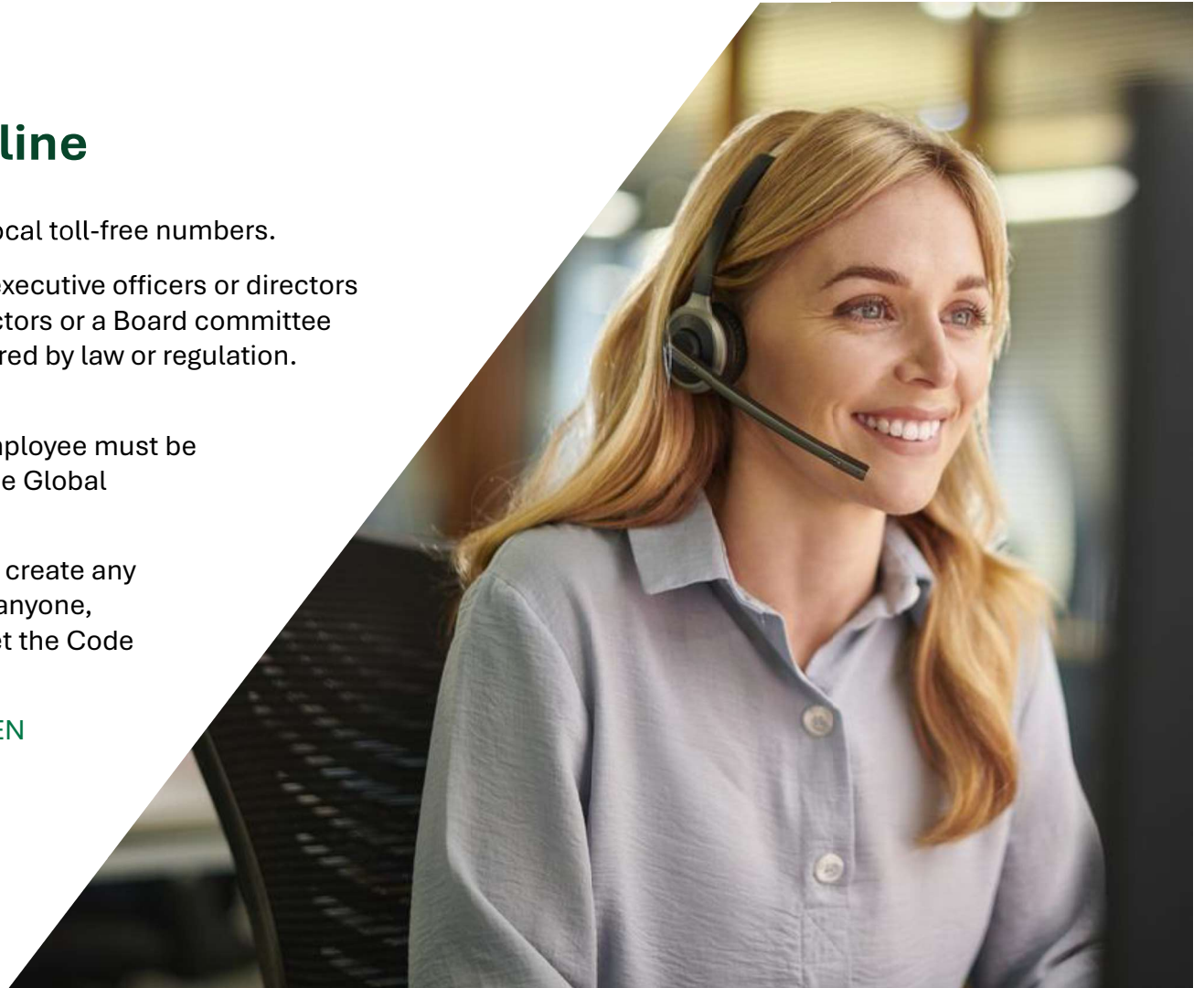
Visit Strada's Ethics Helpline page for local toll-free numbers.

Any waiver of the Code of Conduct for executive officers or directors may be made only by the Board of Directors or a Board committee and will be promptly disclosed as required by law or regulation.

Any waiver of the Code for any other employee must be approved by the Global VP, Legal and the Global Compliance Director.

The Code of Conduct is not intended to create any contractual rights between Strada and anyone, and Strada reserves the right to interpret the Code and change it at its discretion.

Effective October 2024 | [COE.2024.V1.EN](#)



## Resources

### Strada Ethics Helpline

- Germany: From an outside line dial the OneConnect number for your location: 08001801967
- Singapore: From an outside line dial the OneConnect number for your location: 800 492 2847
- Canada: From an outside line dial direct for your location: 1-833-675-6095
- India: From an outside line dial the OneConnect number for your location: 0124 712 8104
- Philippines: From an outside line dial the OneConnect number for your location: (02) 8271 1848

- Poland: From an outside line dial the OneConnect number for your location: 00800005483
- United Kingdom: From an outside line dial the OneConnect number for your location: 08081965817
- United States: From an outside line dial direct for your location: 1-833-675-6094
- Website: <https://strada.ethicspoint.com/>

### Strada Response Center

- SRC@stradaglobal.com
- +1-443-926-0526

### Compliance

- stradacompliance@stradaglobal.com

### HR Connect (Connect Canada, US, Puerto Rico)

### Strada - HRConnect

### Legal

- stradacompliance@stradaglobal.com



# About Strada

Strada is a technology-enabled, people powered company committed to delivering world-class payroll, human capital management, and financial management solutions to organizations globally. With a team of more than 8,000 experts, Strada blends leading-edge technology with human ingenuity to help businesses across the globe design and deliver at scale. Strada supports over 1,400 customers in 33 countries, partnering with customers at every stage of their journey.