

Supplier Code of Conduct

Definition

In the context of our Supplier Code of Conduct, the term "supplier" refers to any individual or entity that provides goods, services, or resources to Acclaro, including freelancers, business partners, and vendors.

Company Vision

Unite people through language - creating value for Acclaro's clients and serving the greater good worldwide.

Values

In all our work and relationships, we live our values to support our clients, each other and communities worldwide.

- **Integrity:** We keep our commitments to our clients, to each other and to ourselves, learning together and advancing our work with intention.
- **Service:** Work performed with a spirit of service empowers each of us to do our best work, strive for excellence and create extraordinary results for our clients and for each other.
- **Community:** Our relationships with our clients, teams and communities create an extended network of support and collaboration that sparks fresh thinking, deeper relationships, and outsized results.
- **Diversity:** Our diversity unites us in a shared mission: To build an equitable, inclusive company and global community where each person's unique background, identity and talents contribute to the betterment and beauty of the whole.
- **Humanity:** We commit to work, relationships and results rooted in excellence, care, and a profound responsibility to contribute to a shared future on an increasingly small planet.

Build Trust and Credibility

The success of Acclaro is dependent on the trust and confidence earned from team members, customers, stakeholders, and suppliers. Acclaro gains credibility by adhering to commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct. It is easy to say what must be done, but the proof lies within actions.

All suppliers are expected to ensure their work builds trust and credibility for Acclaro and creates an environment in which Acclaro can succeed over the long term.

Create a Culture of Open and Honest Communication

At Acclaro everyone should feel comfortable speaking their mind, particularly with respect to ethics concerns. Everyone, including suppliers, has a responsibility to create an open and supportive environment where everyone feels comfortable raising such questions. Everyone benefits tremendously when power is exercised to prevent mistakes or wrongdoing by asking the right questions at the right times.

Acclaro will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, Acclaro will take appropriate action. We will not tolerate retaliation against anyone who raises genuine ethics concerns in good faith.

Suppliers are encouraged, in the first instance, to address such issues with their main point of contact at Acclaro, as most problems can be resolved swiftly. If for any reason that is not possible or if someone is not comfortable raising the issue with their main point of contact, they should reach out to People Operations at recruitment@acclaro.com.

Contribute to a Positive Work Environment

Respect for the Individual

Everyone deserves to work in an environment where we are treated with dignity and respect. Acclaro is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.



Acclaro has a zero-tolerance policy when it comes to discrimination of all types and abusive, offensive, or harassing behavior. Any individual who feels harassed or discriminated against should report the incident to People Operations.

All Acclaro suppliers are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.
- Foster teamwork and participation, encouraging the representation of different perspectives.
- Seek out insights from individuals with different experiences, perspectives, and backgrounds.
- Avoid slang or idioms that might not translate across different cultures.
- Support work arrangements for co-workers with different needs, abilities, and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perceptions of your conduct.

Acclaro will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive, or unwelcome.

Misconduct

While not intended to be an all-inclusive list, the examples below represent behavior that is considered unacceptable in the workplace. Behaviors such as these, as well as other forms of misconduct, may result in disciplinary action, up to and including termination of engagement:

- Theft or inappropriate removal/possession of property
- Falsification of timekeeping records
- Possession, distribution, sale, transfer, manufacture, or use of alcohol or illegal drugs while performing services for Acclaro
- Fighting or threatening violence in the workplace



- Making maliciously false statements about any of Acclaro's team members, customers, stakeholders, and suppliers
- Threatening, intimidating, coercing, or otherwise interfering with the job performance of team members, customers, stakeholders, and suppliers
- Negligence or improper conduct leading to damage of company-owned or customer-owned property
- Violation of safety or health rules
- Sexual or other unlawful or unwelcome harassment
- Unauthorized disclosure of any "business secrets" or other confidential or non-public proprietary information relating to Acclaro's products, services, customers, or processes.

Other forms of misconduct not listed above may also result in disciplinary action, up to and including termination of engagement.

Uphold the Law

Acclaro's commitment to integrity means that suppliers must ensure that their business practices comply with all applicable laws, regulations, directives, embargoes and sanctions where we operate.

Specifically, suppliers may not engage in any form of business with the following:

- Parties who are targeted for boycotts, embargoes, sanctions, or similar measures by the United Nations Security Council.
- Parties who are listed on the European Union's Consolidated Sanctions List.
- Parties who are listed on the United Kingdom's List of Consolidated Financial Sanctions Targets.
- Parties who are listed on the Denied Persons List, Entity List, and Unverified List administered by the U.S. Commerce Department.
- Parties who are listed on the sanctions lists administered by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) and the U.S. State Department.
- Countries or regions that are subject to U.S. embargoes or sanctions, including but not limited to Cuba, Iran, North Korea, Syria, and the Donetsk, Luhansk, and Crimea regions.



- Parties that are directly or indirectly owned or controlled by parties subject to sanctions programs administered by OFAC, either individually or collectively.

Further, there must be an understanding of Acclaro's policies, laws, rules, and regulations that apply to the work performed for Acclaro. If anyone is unsure of whether a contemplated action is permitted by law or Acclaro policy, advice should be sought from People Operations.

Labor

All labor must be voluntary. Suppliers are not allowed to endorse or participate in child labor or forced labor. Additionally, suppliers must refrain from supporting or engaging in prison labor, indentured labor, bonded labor, or any other form of compulsory labor. Suppliers must adhere to regulations that ban human trafficking and follow all applicable local laws in the countries it operates in. This entails ensuring that its employees and representatives do not engage in activities related to human trafficking, such as procuring commercial sex acts, utilizing child labor, or employing forced labor. Suppliers must also abstain from engaging in deceptive or fraudulent employment practices.

Wages, Working Hours, and Other Conditions

All suppliers shall meet applicable standards regarding working conditions across its entire workforce, including, without limitation, laws, regulations, and standards relating to the payment of the minimum legal wage or a wage that meets local industry standards, whichever is greater; the observation of legally mandated break and rest periods; and the health and safety of the workers in the workplace.

Proprietary Information

It is important to respect the property rights of ourselves and others. Suppliers may not acquire or seek to acquire improper means of a client's or competitor's trade secrets or other proprietary or confidential information. They may not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

Selective Disclosure

Suppliers may not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals, or otherwise) any material nonpublic information with



respect to Acclaro, its securities, business operations, plans, financial condition, results of operations, or any development plan. Additionally, client information must only be shared with those who require the information to perform their job responsibilities.

Avoid Conflicts of Interest

Conflicts of Interest

Acclaro effectively oversees and, when necessary, prevents or restricts any business practices that may create conflicts between Acclaro's interests, its employees' interests, and its clients' interests. It is our responsibility to remain attentive to real or potential conflicts and handle them appropriately. We are committed to maintaining fairness in our dealings with the Company, our clients, the public, competitors, suppliers, and each other.

We also expect our suppliers to adhere to similar standards. Suppliers, along with their employees and family members, should not receive any inappropriate advantages through their association with Acclaro nor engage in any activities that could conflict with acting in the best interests of Acclaro.

Determining whether a conflict of interest exists is not always easy to do. Anyone with a conflict-of-interest question should seek advice from People Operations. Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest, individuals must seek review from their managers or People Operations.

Gifts and Entertainment

Gifts and entertainment may create an inappropriate obligation or expectation on the part of the recipient or provider. We expect our suppliers to refrain from providing personal gifts, fees, favors, other compensation or business courtesies, including entertainment activities, that are intended to influence, or might reasonably appear to influence, a business decision. Notwithstanding the above, meals and refreshments offered during a meeting is generally acceptable, provided the purpose is Acclaro-related, the supplier is in attendance, the cost is reasonable and customary, and it is an infrequent occurrence. Our goal is to obtain the best commercial terms for the Company instead of receiving gifts and entertainment. We expect our suppliers to work with us to obtain this goal.

Set Metrics and Report Results Accurately



Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely, and understandable. This obligation applies to all team members, customers, stakeholders, and suppliers, including all financial executives, with any responsibility for the preparation of such reports, including drafting, reviewing, and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Individuals should inform Management and People Operations if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

Acclaro creates, retains, and disposes of our company records as part of our normal course of business in compliance with all Acclaro policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate, and complete, and company data must be promptly and accurately entered into our books in accordance with Acclaro's and other applicable accounting principles.

Suppliers may not influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Acclaro books, records, processes, or internal controls.

Accountability

Suppliers are expected to conduct their business with Acclaro and in general in a manner that aligns with Acclaro's values and with integrity. This includes complying with legal and regulatory obligations. Any fraudulent, dishonest, unethical, or criminal conduct from a supplier or anyone associated with Acclaro will not be tolerated.

While this Code of Conduct does not cover every possible situation, it sets a standard for the behavior and actions expected from suppliers. Adhering to this Code is crucial for



maintaining Acclaro's reputation for integrity and ensuring continued success. If there are concerns whether the standards are being met or if violations are discovered, contact People Operations.

Acclaro takes seriously the standards of this Code, and violations are cause for disciplinary action up to and including termination of engagement.

Be Loyal

Confidential and Proprietary Information

Integral to Acclaro's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by team members, customers, and suppliers. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses/relationships/data, or nonpublic information about other companies, including current or potential suppliers. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment, and information, may be provided for company business use.

Team members, customers, stakeholders, and suppliers of Acclaro are trusted to behave responsibly and use good judgment to conserve company resources.

Generally, company equipment must not be used in the conduct of an outside business or in support of any religious, political, or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours.

In order to protect the interests of the Acclaro network, Acclaro reserves the right to monitor or review all data and information contained on a company-issued computer or electronic device, the use of the Internet, or Acclaro's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.



Questions about the proper use of company resources should be directed to People Operations.

Media Inquiries

From time to time, those who represent Acclaro may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about Acclaro, we should direct all media inquiries to the People Operations team. No one may issue a press release without first consulting with People Operations.

Right to Personal Activity and Privacy

Acclaro is committed to maintaining a high standard on environmental, health and safety, human rights, and ethical practices, including everyone's rights to self-determination, physical integrity, and individual liberty, including freedom of movement, thought, conscience, religion, speech, family rights, nationality, and privacy. Any civic, charitable, political, and/or lobbying activities must be done outside of working hours and must not be presented as being on behalf of Acclaro.

