Ensono Code of Conduct and Ethics

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Table of Contents

Do Right. Do Great Things. 3

I. Honest and Ethical Conduct 4

1. Discrimination and Harassment 5
2. Conflict of Interest 6
3. Gift Policy 8
4. Political Activities 8
5. Non-Retaliation 9

II. Compliance with Laws 9

6. Anti-Corruption and Anti-Bribery 9
7. Competition and Anti-Trust 10
8. Insider Trading 11
9. Anti-Money Laundering (AML) 12
10. Working with Public Sector Entities 13
11. Human Rights and Ethical Labor 14
12. Environmental, Social, and Governance (ESG) 16
13. International Trade and Sanctions 17

III. Responsible Use and Protection of Company Assets 17

14. Proprietary Information and Intellectual Property 18
15. Data Privacy and Cybersecurity 19
16. Books and Record Keeping 20
17. Obligations After Leaving the Company 20
18. Social Media and Public Statements 21
19. Artificial Intelligence 21
20. Workplace Safety 22

IV. Questions & Queries – We're Here to Help 23

CONFIDENTIAL AND PROPRIETARY

Letter from the CEO

The Code of Conduct and Ethics for Ensono, as adopted by Ensono's Board of Directors, in essence comes down to one simple concept – Do Right. Our reputation as an industry leader is based on being innovative and delivering outstanding customer service while upholding the highest standards of integrity. Our business relationships are built on trust, and are sustained by our core values of honesty, reliability, collaboration, curiosity and passion. We trust and require that each person that performs work on behalf of Ensono Do Right by (a) promoting honest and ethical conduct, (b) ensuring compliance of applicable laws, rules, and regulations, (c) protecting Ensono assets and value, and (d) assuring an environment of honesty, fairness, respect, transparency and accountability to one another, our clients and stakeholders.

Associates should also familiarize themselves with Ensono's Associate Support Book and other applicable policies which outline employment practices for associates. All such policies form a part of the Code. The Associate Support Book and policies are available on the Ensono intranet.

Through proactive initiatives, education, and open dialogue, Ensono's desire is to create an environment where all associates feel valued, respected, and empowered. This commitment aligns with our broader corporate responsibility to contribute positively to society. You are expected to treat others with respect, regardless of differences in race, gender, ethnicity, religion, age, sexual orientation, gender identity, caste, disability, or any other characteristic.

Inclusion should be actively practiced in all interactions and collaborative efforts, avoiding discriminatory actions or behaviors. Associates are reminded that good judgement and strong character requires self-discipline and control along with respect for others. These attributes are required in any scenario related to an associate's employment whether in person, virtual/online, in a social setting or representing Ensono in any capacity or environment. We place great importance on these values at Ensono and therefore, any violation of this Code may result in disciplinary action, including and up to termination of employment.



Jeff VonDeylen

Chief Executive Officer

Code of Conduct and Ethics

This Code of Conduct and Ethics ("**Code**") does not form part of any contract of employment or contract to provide services. The Code is reviewed on an annual basis and may be updated from time to time. Any amendment of this Code must be approved by the Board of Directors of Ensono (the "**Company**").

This Code is simply intended to be a statement of certain fundamental principles, policies and procedures that govern all associates, officers, and members of the Board. in the conduct of the Company's business. It is not intended to and does not create any rights in any associate, customer, supplier, competitor, shareholder or any other person or entity.

Reporting Misconduct

Associates must report any suspected violations of this Code, any policy referenced herein or any law, rule or regulation to their manager, CPE team and/or the Chief Legal Officer, or directly to a government authority, as appropriate.

If an associate is uncomfortable with any of those channels or wishes to make a report anonymously, they may report the concern using Company's independent reporting provider, Ethicspoint at

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=59408

I. Honest and Ethical Conduct

This section outlines the core principles and expectations that guide our actions and decisions as representatives of the Company. By fostering a culture of transparency, respect, and accountability, we ensure that our business practices not only comply with legal and regulatory requirements but also reflect our shared values. Every associate is expected to act with integrity, avoid conflicts of interest, and contribute to a positive, inclusive, and respectful workplace environment.



1. Discrimination and Harassment

Ensono is committed to providing a workplace that is free from discrimination, harassment, and toxic behaviors of any kind. We recognize that these issues are not just personal–they threaten the health, productivity, and reputation of our business. Creating a safe, inclusive, and respectful culture is essential to attracting and retaining top talent and driving innovation.

Our Commitment

- **Zero Tolerance:** Ensono does not tolerate discrimination based on race, ethnicity, sex, age, sexual orientation, disability, religion, belief or any other protected characteristic. Harassment–including verbal, physical, sexual, or online misconduct–is strictly prohibited.
- **Safe Reporting:** We provide clear, accessible channels for reporting concerns, including confidential forums and documented incident protocols. Associates should feel empowered to speak up without fear of retaliation. For further information, please refer to our Whistleblower Protection Policy.
- **Swift and Thorough Response:** When incidents are reported, Ensono will act quickly to investigate, protect the rights and reputations of all parties, and take appropriate action. Consequences for violating this Code may include disciplinary action, up to and including termination.
- **Continuous Improvement:** We annually review and update our policies, patch gaps, and test creative solutions to ensure our approach remains effective and relevant in a changing work environment.
- **Sexual Harassment:** Ensono is committed to providing a working environment free from sexual harassment and ensuring all associates are treated, and treat others, with dignity and respect. Sexual harassment or victimization of any associate, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. As such, Ensono will take active steps to help prevent the sexual harassment and victimization of all associates and is committed to remedying any complaints - these may include updating relevant policies, providing further training, and taking disciplinary action against the perpetrator. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it. This will enable us to take appropriate action and provide support. Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control. Sexual harassment and victimization may result in disciplinary action up to and including dismissal.
- **Expectations of Conduct:** We recognize that discrimination, harassment or sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media. If Associates invite guests to the workplace or any social event, Associates remain responsible for the conduct of their guests. Associates are expected to act in accordance with the Code and treat everybody with dignity and respect. For further details, refer to the Global Company Events Policy.
- **Leadership Accountability:** Leaders should proactively check in with associates, ask how they are doing, and create space for candid conversations. This builds trust and makes it easier for associates to raise concerns.



Why this Matters

Impact on People and Business: Toxic behavior erodes morale, damages relationships, and undermines productivity. It places undue pressure on managers and associates who experience or witness such behavior may often be less engaged and collaborative, and harms Ensono's reputation.

- **Hybrid Work Challenges:** Remote and hybrid work arrangements can make it harder to identify and address inappropriate behavior, as microaggressions or harassment may only be visible to those directly involved. It is important that our checks and balances continue to align with this evolving landscape.
- **Reporting Barriers:** Many incidents go unreported due to unclear procedures or fear that nothing will be done. At Ensono, we have an open-door policy fostering transparency and open dialogue. Making our response and investigation protocols public and accessible helps build trust and encourages associates to come forward.

Scenario

An associate receives repeated unwelcome and inappropriate comments from a colleague during video meetings about her weight. The associate uses Ensono's confidential reporting process to raise the issue. The Company investigates promptly and takes appropriate action based on the findings. CPE team communicates the outcome and reiterates the consequences for violating the Code, reinforcing a culture of accountability and respect.

Please also refer to our US Associate Support Book, India Disciplinary and Grievance Policy, UK Disciplinary Policy, Poland Disciplinary Policy, India Prevention of Sexual Harassment Policy and Brazil Associate Support Book for further details.





2. Conflict of Interest

At Ensono, we expect all associates to act with integrity and avoid situations where personal, financial, or family interests could conflict–or appear to conflict–with the interests of the Company. A conflict of interest can be actual, potential, or perceived, and may arise from outside employment, board memberships, close personal relationships, or use of Company information or resources for personal gain.

Our Expectations:

- Avoid situations that could compromise your impartiality or objectivity.
- Disclose any actual, potential, or perceived conflicts of interest to your manager, the CPE team, or the Corporate Legal team as soon as possible.
- Do not use your position at Ensono for personal benefit or to benefit friends or family.
- Obtain prior written approval before accepting board or advisory positions with outside organizations, especially those that do business with or compete with Ensono.
- Remove yourself from any decision-making process where an actual or perceived conflict exists.

Examples of Conflicts of Interest:

- Accepting inappropriate gifts, entertainment, or favors from suppliers, clients, or competitors.
- Having a significant financial interest in a company that does business or competes with Ensono, which may impair your ability to make an objective decision.
- Working for or consulting with a competitor or client.
- Using Ensono's proprietary information or resources for personal projects or outside business activities.
- Influencing hiring or business decisions involving family members or close friends

Scenarios

1 Scenario: Vendor Selection

What happened?

Sarah, an Ensono associate, was asked to help choose a new software vendor. She realized her brother works for one of the companies being considered.

What did she do?

Sarah let her manager know right away about the connection. She stepped back from the selection process, making sure the process remained fair and there was no perception of a conflict.

2 Scenario: Gifts from Vendors

What happened?

An Ensono associate responsible for procurement decisions is approached by a vendor currently bidding for a contract. The vendor offers the associate a luxury weekend getaway package, including hotel accommodations and event tickets, as a gesture of appreciation.

What did she do?

The associate promptly discloses the offer to their manager and the CPE team, seeking guidance before taking any action. After reviewing the situation, Ensono leadership determines that accepting the gift would violate the Code and could compromise the fairness of the procurement process. The associate is advised to politely decline the gift and explain Ensono's policy to the vendor.

3 Scenario: Using Company Resources

What happened?

Alex used Ensono's cloud migration tools to help a friend's startup.

What did he do?

When it came to light, Alex was reminded that Company resources are for Company business only as mentioned in the Information Security Policy. The incident is documented, and Alex might face disciplinary action.

4 Scenario: Hiring Friends or Family

What happened?

A hiring manager pushed to hire a close friend for a role, but didn't mention their relationship.

What did they do?

Once the connection was discovered, the hiring process was paused. An independent panel took over to make sure everything was handled fairly. The manager's failure to disclose the conflict of interest was found to be a violation of the Code. As a result, the manager could receive formal disciplinary action, which may include a written warning and mandatory training on the Code of Conduct.

Why this Matters

At Ensono, we know that conflicts of interest can pop up in all sorts of ways. The key is to speak up early, step back when needed, and always put the Company's interests first. If you're ever unsure, just ask your manager or the Corporate Legal team –they're here to help. All disclosures are handled confidentially and without retaliation.



3. Gift Policy

Associates are expected to act with integrity and avoid any conduct that could create even the appearance of impropriety. Gifts, entertainment, or hospitality from clients, suppliers, or partners must never influence—or appear to influence—business decisions.



4. Political Activities

Ensono encourages associates to be active and informed citizens, including participating in the political process on your own time and at your own expense. However, it's important to keep your personal political activities separate from your role at Ensono.

You should not accept or offer any gift, entertainment, or hospitality that is excessive, inappropriate, or could be seen as an attempt to gain an unfair advantage. Modest tokens of appreciation, such as branded items or welcome baskets, may be acceptable in limited circumstances where they are reasonable, customary, and consistent with applicable laws and Company policies. If you are ever unsure whether a gift, entertainment, or hospitality is appropriate, you should seek guidance from your manager, the CPE team, or the Corporate Legal team before accepting or offering it. If you are offered a gift or hospitality that does not meet these standards, politely decline and promptly report the situation. Remember, Ensono's Global Expenses Policy provides further detail and guidance on gifts and entertainment. When in doubt, always err on the side of transparency and ask for advice.

Scenario

You're working with a long-term supplier who, after a successful project launch, offers you a high-end smartwatch as a thank-you gift. While the gesture may seem like appreciation, you recognize that accepting such an expensive item could be seen as an attempt to influence future business decisions. You politely decline the gift, explain Ensono's policy, and immediately inform your manager and the CPE team. If the supplier had instead sent a modest welcome basket with snacks or company-branded pens, you could accept it, provided it is within policy limits and properly recorded. Remember: When in doubt, err on the side of transparency and seek advice.

- **Personal, Not Professional:** Do not use Ensono's name, resources, or your position at the Company to support or oppose any political party, candidate, or cause. If you participate in political activities, make it clear you are acting in a personal capacity—not on behalf of Ensono.
- **No Company Endorsement:** Do not make political contributions or commitments on behalf of Ensono. The Company does not reimburse associates for personal political donations or expenses but is supportive of associates taking time off from work to exercise their right to vote during an election.
- **Work Time and Resources:** Company time, funds, email, logos, or other resources must not be used for political campaigning, fundraising, or advocacy.
- **Seeking Office or Appointment:** If you are considering running for public office or accepting a government appointment, you must notify your manager and Corporate Legal team in advance to discuss any potential conflicts of interest or impact on your role at Ensono.

Scenario

You are passionate about a local election and want to volunteer for a candidate's campaign. You may do so on your own time, using your personal email and resources. However, you may not use your Ensono email address, Company laptop, or work hours for campaign activities, nor should you suggest your support is connected to Ensono in any way. If you have questions about political activities or potential conflicts, contact the CPE team or the Corporate Legal team.



5. Non-Retaliation

Ensono is committed to maintaining a safe and respectful workplace where everyone feels empowered to speak up about concerns, violations, or misconduct without fear of retaliation.

Our Commitment

- We strictly prohibit any form of retaliation against associates who, in good faith, report concerns, violations of the Code, unethical behavior, or participate in investigations.
- Retaliation includes, but is not limited to, adverse actions such as demotion, dismissal, harassment, exclusion, or any other negative treatment as a result of raising a concern or participating in an investigation.

Your Responsibilities

- Speak up if you witness or experience behavior that violates our Code, or any other internal policies knowing you are protected from retaliation.
- Report any suspected retaliation immediately to your manager, CPE team or via our anonymous EthicsPoint channel as highlighted in our Whistleblower Protection Policy.
- Cooperate fully and honestly in any investigation, and treat all parties involved with respect.

Why this Matters

A culture of trust and openness is essential for Ensono's success. Protecting those who raise concerns ensures that issues are addressed promptly and fairly, and helps maintain a positive, ethical workplace for everyone. If you have questions or concerns about retaliation, contact CPE team.

II. Compliance with Laws

Ensono's reputation is built on a foundation of trust and responsibility. We support critical infrastructure for our clients, and our clients rely on us to uphold the law in every aspect of our business. Compliance is not just a legal obligation—it's a reflection of our values and our commitment to ethical conduct. Each of us is expected to know and follow the laws, regulations, and contractual requirements that apply to our roles, where we do business. In the event that you are unclear on applicable law, you may reach out to the Corporate Legal team to help address any questions. By doing so, we protect our clients, our colleagues, and our Company, and we reinforce the integrity that sets Ensono apart.



6. Anti-Corruption and Anti-Bribery

Ensono is committed to conducting business with the highest standards of integrity, honesty, and transparency. We have zero tolerance for any form of bribery or corruption, whether direct or indirect, and expect all associates, contractors, and business partners to uphold these principles.

All associates must comply with all applicable anti-corruption and anti-bribery laws and regulations in every country where we operate, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant local legislation.

Key Principles

Ensono strictly prohibits all forms of bribery and improper payments, whether direct or indirect, including non-permitted facilitation ("grease") payments, regardless of local customs. Gifts, entertainment, or hospitality may only be offered or accepted if they are reasonable, infrequent, and not intended to influence business decisions; anything that could be perceived as a bribe must be refused and reported. All third parties acting on Ensono's behalf must comply with our anti-corruption standards, and appropriate due diligence and monitoring are required.

All transactions must be accurately and transparently recorded. Any suspected bribery, corruption, or unethical conduct must be reported immediately and will be handled confidentially, with protection from retaliation. For more details, refer to Ensono's Anti-Corruption and Anti-Bribery Policy.

Why this Matters

Corruption and bribery undermine trust, damage our reputation, and can result in severe legal and financial consequences for both individuals and the Company. Ethical conduct is essential for long-term business success and for maintaining the trust of our clients, partners, and communities.

Scenario

You are negotiating a contract with a potential client, and the client's representative suggests that awarding them a personal "bonus" will help secure the deal. You decline, explaining this could violate Ensono's Anti-Corruption and Anti-Bribery Policy, document the incident, and report it to the Corporate Legal team.

Upholding these standards is everyone's responsibility at Ensono.



7. Competition and Anti-Trust

Ensono is dedicated to upholding the principles of fair competition and complying with all applicable anti-trust and competition laws in every market where we operate.

What This Means for You

- **Fair Competition:** We must never engage in practices that unlawfully restrict competition. This includes, but is not limited to, price-fixing, bid-rigging, dividing markets or clients, or colluding with competitors in any way. Such actions are illegal and strictly prohibited.
- **No Unlawful Agreements:** Do not enter into any agreement or even informal understanding with competitors regarding prices, terms, territories, customers, or the allocation of markets or resources. Even casual conversations or "gentlemen's agreements" can violate anti-trust laws.
- **No Abuse of Market Position:** We must not use Ensono's market position to unfairly exclude competitors, control prices, or otherwise distort the marketplace.
- **Respect for Confidential Information:** Never seek or use confidential information from competitors, clients, or suppliers in an improper manner. If you inadvertently receive such information, report it to the Corporate Legal team immediately.
- **Cautious Interactions:** Be especially careful when interacting with competitors at industry events, conferences, or trade associations. Avoid any discussions or exchanges of information that could be perceived as anti-competitive.
- **Compliance with Laws:** All associates are required to comply with the competition and anti-trust laws of every country in which we do business. Violations can result in severe penalties for both Ensono, and the individuals involved.

Why this Matters

Violating competition or anti-trust laws can lead to significant legal, financial, and reputational harm for Ensono and its associates. These laws are in place to protect consumers, encourage innovation, and ensure that businesses compete on a fair and ethical basis.

Scenario

You are at an industry conference, and a competitor suggests that both companies could benefit by agreeing not to compete for certain clients in a specific region. The correct response is to withdraw from the conversation, make a note of the incident, and report it to the Corporate Legal team.

Guidance

- If you are ever unsure whether a conversation, agreement, or business practice could raise competition or anti-trust concerns, seek guidance from the Corporate Legal team before proceeding.
- Remember, even informal discussions or "gentlemen's agreements" with competitors can violate the law.
- Upholding the principles of fair competition and anti-trust is everyone's responsibility at Ensono.



8. Insider Trading

Ensono is committed to upholding the highest standards of integrity and compliance with all applicable securities laws. Insider trading–using material, non-public information to buy or sell securities, or to tip others to do so–is strictly prohibited.

What is Insider Trading?

Insider trading occurs when someone uses confidential, material information about a company that is not available to the public to make decisions about buying or selling that company's securities (such as stocks or bonds). This also includes sharing such information ("tipping") with others who might use it to trade.

Our Commitment

- **No Use of Material Non-Public Information:** Associates must never use confidential information obtained through their work at Ensono or through dealings with clients, partners, or suppliers to trade in any company's securities, before that information is made public.
- **No Tipping:** You must not share material, non-public information with anyone–including family, friends, or colleagues–who might use it to trade securities.
- **Examples of Material Non-Public Information:** This can include, but is not limited to, financial results, mergers and acquisitions, new product launches, changes in executive leadership, or significant business developments that have not been publicly disclosed.
- **Obligation to Safeguard Information:** All associates are responsible for protecting confidential information and ensuring it is not disclosed or used inappropriately.

Why this Matters

Insider trading is illegal and unethical. It undermines trust in the financial markets, damages Ensono's reputation, and can result in severe civil and criminal penalties for both the individuals involved and the Company.

Scenario

You learn through your work at Ensono that a client is about to announce a major acquisition that will likely affect its stock price. You must not buy or sell that client's stock, nor should you share this information with anyone else, until the information is made public.

Guidance

- If you are unsure whether information is material or non-public, do not trade or share it, and seek guidance from the Corporate Legal team.
- Remember, these rules apply to information about Ensono, our clients, partners, and suppliers. Upholding these standards is everyone's responsibility at Ensono.



9. Anti-Money Laundering (AML)

Ensono is committed to preventing money laundering, terrorist financing, bribery, corruption or any other form of financial crime, and complying with all applicable anti-money laundering laws and regulations in every country where we operate.

What is Money Laundering?

Money laundering is the process of disguising the origins of money obtained through illegal activities, making it appear legitimate. Terrorist financing involves providing funds for terrorist activities, regardless of the source. For more details please refer to Ensono's Anti-Money Laundering Policy and Anti-Corruption and Anti-Bribery Policy.

Our Commitment

- **Vigilance:** All associates must be alert to unusual or suspicious transactions or activities that could indicate money laundering or terrorist financing.
- **Know Your Customer (KYC):** We conduct due diligence on clients, suppliers, and business partners to understand who we are doing business with and to ensure their legitimacy.
- **No Facilitation:** Associates must never knowingly participate in or facilitate money laundering or terrorist financing, directly or indirectly.
- **Accurate Record-Keeping:** All business transactions must be accurately and transparently recorded. False, incomplete, or misleading records are strictly prohibited.
- **Reporting:** If you suspect or become aware of any suspicious activity, you must report it immediately through the appropriate internal channels. Reports can be made confidentially and without fear of retaliation.

Examples & Scenarios

1 **Scenario: Unusual Payment Requests**

A client requests to pay for services using multiple unrelated accounts, or insists on making payments in cash or in a currency not specified in the contract.

What to do:

Recognize this as a red flag. Do not process the transaction. Report the situation to the Finance or Treasury team for review.

2 **Scenario: Reluctance to Provide Information**

A new supplier is unwilling to disclose ownership details or provide standard business documentation, or provides documents that cannot be validated.

What to do:

Pause the onboarding process and escalate the issue to Global Head of Procurement for further due diligence.

3 Scenario: Third-Party Involvement

A client insists on using an unknown third party to make or receive payments, or requests that payments be made to or from unrelated entities.

What to do:

Recognize this as a potential red flag and escalate to Finance team.

Why this Matters

Money laundering and terrorist financing enable criminal activity, undermine the integrity of the financial system, and can expose Ensono and its associates to severe legal and reputational risks.

Guidance

- Be alert for unusual payment methods, complex or opaque business structures, or reluctance to provide information.
- If you are unsure whether a transaction or relationship is suspicious, seek guidance from the Finance or Treasury team before proceeding.
- Compliance with anti-money laundering laws is everyone's responsibility at Ensono.

For more information or support, contact the SVP of Finance or the VP of the Treasury team.



10. Working with Public Sector Entities

Engaging with government agencies, state-owned enterprises, and other public sector entities brings unique responsibilities and heightened compliance requirements. Ensono is committed to conducting all public sector business with the highest standards of integrity, transparency, and in full compliance with applicable laws and regulations.

Our Commitment

- **Strict Compliance:** Associates must comply with all laws, regulations, and internal policies governing public sector procurement, contracting, and interactions with government officials.
- **No Improper Influence:** Never offer, promise, or provide anything of value– directly or indirectly–to a government official or their family members to obtain or retain business, or to gain any improper advantage.
- **Gifts and Hospitality:** Gifts, entertainment, or hospitality for public officials are highly restricted and often prohibited. Never offer or accept such items without prior written approval from the Corporate Legal team and always ensure compliance with local laws.
- **Accurate Information:** Do not attempt to obtain or use non-public, confidential, or restricted information from or about public sector entities or their procurement processes. Only use information that is lawfully and publicly available.
- **Fair Bidding:** All bids, proposals, and communications with public sector clients must be honest, accurate, and free from misrepresentation or unethical conduct. Never attempt to improperly influence the outcome of a public tender or procurement process.
- **Third Parties:** Any third party (such as agents, consultants, or subcontractors) acting on Ensono's behalf in public sector engagements must be carefully vetted and must comply with all applicable laws and Ensono's standards.
- **Employment Discussions:** Do not discuss employment or business opportunities with current or former government officials while they are involved in procurement or regulatory decisions affecting Ensono. If any employment opportunities arise when they are no longer involved in decision-making affecting Ensono, these opportunities must be explored through regular course internal hiring processes.

Examples & Scenarios

1 **Scenario: Restricted Gifts**

A government client invites you to a public event and suggests that a token of appreciation would be appropriate.

What to do:
Politely decline and consult the Corporate Legal team and Finance team before offering or accepting anything of value.

2 **Scenario: Access to Confidential Information**

You are approached by a consultant who claims to have access to confidential government tender documents and offers to share them for a fee.

What to do:
Refuse the offer and immediately report the incident to the Corporate Legal team. Using or soliciting non- public information is strictly forbidden.

3 **Scenario: Third-Party Risks**

A local agent offers to "facilitate" a government contract for Ensono in exchange for a commission but is vague about their methods.

What to do:

Do not engage the agent. All third parties must be subject to due diligence and must not be used to circumvent anti-bribery or procurement rules.

Why this Matters

Public sector business is subject to close scrutiny and strict legal requirements. Violations can result in severe penalties, loss of business, reputational harm, and even criminal liability for individuals and the Company.

Guidance

- Always seek guidance from the Corporate Legal team before engaging in any activity involving public sector entities or officials.
- When in doubt, err on the side of caution and transparency.
- Report any suspected violations or concerns immediately.



11. Human Rights and Ethical Labor

Ensono is committed to its role in the fight to eliminate modern slavery and human trafficking and in its objective to respect human rights as prescribed under international human rights standards, including the Universal Declaration of Human Rights.

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We are strongly opposed to the unethical treatment of people, including any acts of slavery or human trafficking, and we continue to be committed to ensuring that we maintain compliance with all applicable human rights laws, trade ethically, source responsibly, and work to prevent modern slavery, forced labor, child labor and human trafficking throughout our organization and in our supply chain, including by ensuring that our organization and supply chain apply wages and working time that shall, as a minimum, comply with all applicable laws, prohibit the hiring of slave and forced labor and prevent practices that contribute to human trafficking. For further information, please refer to our Anti-Slavery Statement.

Our Commitment

- **No Forced Labor:** Ensono does not tolerate any form of forced, bonded, or involuntary labor. All work must be voluntary, and associates are free to leave their employment after serving notice in accordance with their employment contract.
- **No Child Labor:** We do not employ children under the minimum legal working age in any country where we operate. We comply with all applicable laws and international standards regarding child labor.
- **Respect for Labor Rights:** We respect the rights of all workers to fair wages, safe working conditions, reasonable working hours, which must at least comply with all applicable local laws, and freedom of association. Discrimination, harassment, or abuse of any kind is strictly prohibited.
- **Supply Chain Responsibility:** We expect our suppliers, partners, and contractors to adhere to these same standards. Ensono conducts due diligence and may audit suppliers to ensure compliance with labor laws and ethical practices.

Examples & Scenarios

1 Scenario: Third-Party Supplier Audit

During a routine audit, Ensono discovers that a supplier is using workers who are not paid minimum wage or are working excessive hours without breaks.

What to do:

Immediately escalate the issue to the Global Head of Procurement. Ensono will work with the supplier to remediate the situation or terminate the relationship if necessary.

2 Scenario: Child Labor Concerns

A business partner in another country offers to expedite a project using a workforce that includes individuals under the legal working age.

What to do:

Refuse the offer and report the incident to the Procurement team. Ensono will not engage with partners who violate child labor laws.

3 Scenario: Forced Labor Indicators

An associate reports that a colleague is being forced to work overtime under threat of losing their job or having wages withheld.

What to do:

Treat this as a serious violation. Report the situation immediately for investigation and resolution.

Why this Matters

Violations of labor rights, including forced labor and child labor, are not only illegal but also fundamentally opposed to Ensono's values. Such practices harm individuals, communities, and our reputation as a responsible business.

Guidance

- Be vigilant for signs of labor rights violations in your own work and in dealings with suppliers or partners.
- If you suspect or become aware of any violation, report it immediately through the appropriate internal channels.
- Ensono will investigate all reports thoroughly and take appropriate action.



12. Environmental, Social, and Governance (ESG)

At Ensono, we believe that being a responsible business is about more than just financial results–it's about making a positive impact on our environment, our communities, and the way we govern ourselves. Our commitment to ESG principles is central to our long-term success and to building trust with our clients, partners, associates, and society at large.

Our Commitment

- **Environmental Stewardship:** We are committed to reducing our environmental footprint through responsible energy, water, and waste management, and supporting the transition to a more sustainable operating environment. Our data centers and offices operate efficiently, seeking opportunities to reduce greenhouse gas emissions and to support the transition to a low-carbon economy.
- We leverage our expertise in cloud, mainframe, and digital transformation to help clients modernize their IT infrastructure in ways that support their own sustainability objectives. We expect our suppliers and partners to share our commitment to environmental responsibility and to comply with all applicable environmental laws and regulations.
- **Social Responsibility:** At Ensono, our goal is to drive innovation and create an environment that motivates, engages and empowers associates to achieve their goals. We believe in an open and inclusive approach to working together, where associates can build productive relationships within and outside the Company that propel us forward, and drive better technology solutions for today and tomorrow.
- The Ensono Charitable Foundation is a philanthropic initiative committed to making a positive impact in the communities where Ensono operates by supporting a variety of charitable causes and initiatives through donations, volunteer efforts and partnerships with non-profit organizations.
- With a focus on education, health, and community development, the foundation aims to empower individuals and foster sustainable growth.
- **Governance and Ethics:** Ensono integrates responsibility at every level of the organization, starting with our board of directors. With the oversight of the board, we conduct regular audits of our business internally and by independent third parties, maintain industry recognized certifications, and monitor controls throughout our operations to enhance the security and efficiency of our business. Ensono also ensures that associates have a channel to hold one another accountable by maintaining a Whistleblower Protection Policy that demonstrates our commitment to protect anyone who makes a claim based on reasonable belief of a violation. All claims are investigated with any decisions or actions properly communicated and an opportunity to appeal.

Examples & Scenarios

1 Scenario: Environmental Impact

You are upgrading your hybrid work setup and have obsolete electronic equipment such as old laptops, monitors, docking stations, keyboards, or charging cables that you no longer need.

What to do:

Do not throw electronic waste into regular trash bins or local household waste. Submit a ticket to IT team to arrange for the return of the equipment. IT will ensure the devices are either refurbished for reuse, minimizing landfill impact and aiding in sustainability.

2 Scenario: Social Responsibility

A supplier is found to be discriminating against workers or failing to provide safe working conditions.

What to do:

Report the concern to the Procurement team. Ensono will investigate and, if necessary, work with the supplier to address the issue or end the relationship.

3 **Scenario: Governance**

You become aware of a potential conflict of interest or unethical behavior by a manager.

What to do:

Use Ensono's reporting channel, EthicsPoint, to raise your concern confidentially. All reports will be investigated and addressed appropriately.

Why this Matters

Our ESG commitments help us manage risks, identify opportunities, and create long-term value for all stakeholders. They also reflect our values and our responsibility to future generations.

Guidance

- Consider the environmental and social impact of your decisions and actions.
- Speak up if you see practices that are inconsistent with our ESG commitments.
- Stay informed about Ensono's ESG initiatives and participate where you can.

For more information, refer to Ensono's ESG Brief. You may also reach out to the ESG Steering Committee.



13. International Trade and Sanctions

Ensono operates in a global marketplace and is committed to complying with all applicable laws and regulations governing international trade, including export controls, import laws, and economic sanctions.

Our Commitment

- We comply with all international trade laws, export controls, and sanctions regulations in every country where we do business.
- We do not engage in business with individuals, entities, or countries that are subject to government sanctions or trade restrictions.
- We ensure that our services and technologies are not used for prohibited purposes or transferred to restricted parties.

Your Responsibilities

- Be aware of and follow all relevant international trade and sanctions laws when conducting business across borders.
- Do not participate in transactions or business activities with sanctioned individuals, organizations, or countries.
- Seek guidance from the Corporate Legal team if you are unsure about the trade status of a client, partner, or transaction.
- Accurately report and document all cross-border transactions as required by law and Company policy.

Why this Matters

Compliance with international trade and sanctions laws protects Ensono from legal and financial risks, maintains our reputation, and supports global security and ethical business practices.

III. Responsible Use and Protection of Company Assets

Ensono's assets—whether physical, digital, intellectual, or reputational—are essential to our ability to serve clients and achieve our goals. Every associate is entrusted with the responsibility to use Company resources wisely, protect sensitive information, and safeguard our property from loss, misuse, or unauthorized access.

This includes everything from data and technology to our brand and confidential business information. By treating Ensono's assets with care and integrity, we help ensure the Company's long-term success and maintain the trust of our clients, partners, and colleagues.



14. Proprietary Information and Intellectual Property

At Ensono, our proprietary information and intellectual property (IP) are among our most valuable assets. Protecting these assets—and respecting the IP of others—is essential to our success, our reputation, and our ability to innovate.

Our Commitment

- **Protection of Ensono's Assets:** All associates are responsible for safeguarding Ensono's proprietary information, including trade secrets, business strategies, financial information, client data, software, inventions, designs, and other confidential materials.
- **Confidentiality:** Do not disclose Ensono's confidential or proprietary information to anyone outside the Company unless authorized and a proper confidentiality agreement is in place. Only share such information internally with colleagues who have a legitimate business need to know. Maintain all confidential information received from third-parties in strict confidence and do not disclose, reproduce, or use such information except as expressly authorized.
- **Respect for Third-Party IP and confidential information:** We respect the intellectual property rights of others. Do not use, copy, or distribute third-party materials (such as software, documents, or data) without proper authorization or licensing.
- **Proper Use:** Use Ensono's proprietary information and IP only for legitimate business purposes. Never use Company assets for personal gain or to benefit another organization.
- **Reporting Loss or Misuse:** If you suspect that proprietary information or IP has been lost, stolen, misused, or improperly disclosed, report it immediately to the Information Security team.
- **After Leaving Ensono:** Your obligation to protect Ensono's proprietary information continues even after your employment ends. See the "Obligations After Leaving the Company" section for more details.

Examples & Scenarios

1 **Scenario: Sharing Confidential Information**

You are asked by a supplier to share a client list or technical documentation.

What to do:

Do not share any proprietary or confidential information without proper authorization and a signed non- disclosure agreement. Consult the Corporate Legal team if you are unsure.

2 **Scenario: Using Third-Party Content**

You find useful software code and want to use them in an Ensono project.

What to do:

Ensure you have the proper license or permission and that any technology has been properly vetted before using any third-party materials. When in doubt, check with the Procurement team.

3 **Scenario: Unauthorized Data Transfer During Exit**

During their final week, an associate copies personal documents (such as resume, recent pay stubs) from their Ensono OneDrive to their personal Google Drive. However, because they're stored in a shared folder, the associate inadvertently also copies Ensono confidential files - client documentation, workflows, and proprietary information, without realizing it until after the upload is complete.

What to do:

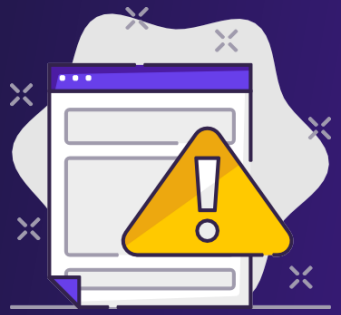
An associate should always request manager approval before transferring files. Carefully review your selection item-by-item, never use "select all". If uncertain about file ownership, ask IT team for assistance. If you accidentally transfer confidential information, immediately report it to IT, team your manager, and CPE team so they can audit the transfer and remove unauthorized copies.

Why this Matters

Protecting proprietary information and intellectual property safeguards our competitive advantage, maintains client trust, and ensures we comply with legal and contractual obligations. Failing to do so can result in legal action, financial loss, and reputational harm.

Guidance

- Always label confidential documents appropriately and store them securely. For further information, please refer to Ensono's Policy on Control of Documented Information.
- Be cautious when discussing Company business in public or online.
- Never use or share proprietary information for personal benefit or to help another company.
- If you have questions about what constitutes proprietary information or IP, or how to protect it, contact the Corporate Legal team.



15. Data Privacy and Cybersecurity

At Ensono, protecting data privacy and maintaining strong cybersecurity are fundamental to our business and our clients' trust. Every associate has a responsibility to safeguard sensitive information and uphold the highest standards of security.

Our Commitment

- **Data Privacy:** We handle all personal and sensitive information responsibly and in compliance with applicable laws and regulations. Associates must only access, use, or share data as required for their role and must respect the privacy rights of clients, colleagues, and partners at all times. When individuals or organizations share their personal data with us, we provide clear information about who will collect and use the data, explain the purposes for which it will be used, and honor their rights to access and correct their information.
- **Cybersecurity:** Cybersecurity is a shared responsibility. We take a proactive approach to identifying, preventing, and responding to cyber threats. Associates are expected to follow all security policies, use strong passwords, and report any suspicious activity or potential security incidents immediately.
- **Security by Design:** Security is integrated into our processes from the outset, including secure development practices, regular vulnerability assessments, and continuous monitoring of our systems.
- **Continuous Improvement:** We invest in ongoing training and awareness to ensure all associates understand their responsibilities and stay current with best practices in data privacy and cybersecurity.

Your Responsibilities

- Protect confidential and sensitive information from unauthorized access, disclosure, or loss.
- Follow all Company policies and procedures related to data privacy and cybersecurity.
- Use Company systems and data only for legitimate business purposes.
- Promptly report any data breaches, security incidents, or suspected vulnerabilities to the Privacy Officer or the Chief Information Security Officer.
- Participate in required training and stay informed about current threats and safe practices.

Why this Matters

Strong data privacy and cybersecurity practices protect our clients, our Company, and our reputation. They are essential for maintaining trust, meeting legal and contractual obligations, and ensuring the resilience of our services. If you have questions or concerns about data privacy or cybersecurity, please refer to the Information Security Policy, contact the Information Security team or the Privacy Officer.



16. Books and Record Keeping

Accurate and transparent record keeping is essential to maintaining trust with our clients, partners, and regulators. All associates are expected to maintain complete, timely, and truthful records in accordance with Company policies and applicable laws.

Our Commitment

- We ensure that all financial, operational, and business records are accurate, complete, and reflect the true nature of transactions and activities.
- We comply with all legal and regulatory requirements regarding the creation, retention, and disposal of records.
- We do not falsify, misrepresent, or conceal information in any Company records.

Your Responsibilities

- Record all transactions and business activities promptly and accurately.
- Retain and dispose of records according to Company policy and legal requirements.
- Never create or approve false or misleading records.
- Cooperate fully with audits, investigations, and requests for information from authorized parties.
- Protect confidential and proprietary information contained in Company records.

Why this Matters

Proper books and record keeping help us meet our legal obligations, support sound decision-making, and maintain the integrity and reputation of Ensono. If you have questions about record keeping or need guidance, please refer to Ensono's Retention Policy, the Privacy Officer or the Corporate Legal team.



17. Obligations After Leaving the Company

Your responsibilities to Ensono do not end when your employment or engagement with the Company concludes. Certain obligations continue even after you leave, to protect Ensono's business, clients, and reputation, including those set out in your agreement which you should review.

Your Ongoing Obligations

- **Confidentiality:** You must continue to protect all confidential and proprietary information you learned or accessed during your time at Ensono. Do not use, disclose, or share this information with anyone outside the Company, or for your own benefit, unless required by law.
- **Return of Company Property:** Upon leaving, you must return all Company property, including laptops, mobile devices, documents, files, access cards, and any other materials belonging to Ensono, whether in physical or electronic form.
- **Intellectual Property:** Any inventions, work product, or intellectual property created during your employment remain the property of Ensono, even after your departure.
- **Non-Solicitation and Non-Compete (if applicable):** If you are subject to non-solicitation or non-compete agreements, you must continue to honor these commitments as outlined in your employment contract or other agreements.
- **Cooperation:** You may be required to cooperate with Ensono in connection with any ongoing or future investigations, litigation, or audits relating to your period of employment.

Why this Matters

These obligations help protect Ensono's business interests, client relationships, and intellectual property. Failing to meet these responsibilities can result in legal consequences for you and harm to the Company. If you have questions about your obligations after leaving Ensono, please contact the CPE team.



18. Social Media and Public Statements

As representatives of Ensono, associates must use care and good judgment when communicating on social media or making public statements about the Company, its clients, partners, or business activities.

Our Commitment

- We maintain a professional and respectful presence online and in public forums.
- We protect confidential and proprietary information and do not disclose sensitive business details, client information, or internal matters.
- We ensure that any statements, posts, or comments made on behalf of Ensono are accurate, truthful, and in line with Company values and policies.

Your Responsibilities

Associates are encouraged to share and engage with publicly available Ensono content through their personal social media channels. However, associates may not represent themselves as an authorized spokesperson for Ensono, make official statements on the Company's behalf, or communicate non-public company positions unless specifically authorized to do so. When expressing personal views on matters related to Ensono, associates should make clear that they are speaking in their individual capacity and not on behalf of the Company.

- Clearly distinguish personal opinions from official Company positions when posting or speaking publicly.
- Do not share confidential, proprietary, or non-public information about Ensono, its clients, or partners.
- Avoid making statements or posting content that could harm Ensono's reputation, relationships, or business interests.
- Follow all Company policies and guidelines regarding social media use and public communications.
- Ensure that any comments, imagery, or music used in social media posts are respectful, inclusive, and consistent with Ensono's values.
- Seek guidance from the Marketing team if you are unsure about making a public statement or responding to media inquiries.

Why this Matters

Responsible use of social media and public statements helps protect Ensono's reputation, maintain trust with clients and partners, and ensure compliance with legal and contractual obligations. If you have questions about social media or public communications, please refer to the Global Social Media Policy or contact the Marketing team.



19. Artificial Intelligence

Artificial Intelligence (AI) is transforming the way Ensono operates, driving innovation, efficiency, and new opportunities across our business. As we adopt and integrate AI technologies, we are committed to using them responsibly, ethically, and in alignment with our values.

Our Commitment

- We use AI to enhance decision-making, improve services, and support our clients, while maintaining transparency, fairness, and accountability in all AI-driven processes.
- We recognize that AI can introduce risks, including bias and unintended consequences. We strive to mitigate these risks through careful selection, implementation, and ongoing management of AI solutions.

- We ensure that both associates and the technologies they use are held to the same ethical standards, so innovation does not come at the expense of our commitment to diversity, equity, and inclusion.

Your Responsibilities

- Use only authorized AI tools and solutions in accordance with Company policies such as the Ensono AI Policy, ethical standards, and applicable laws.
- Be aware of the potential for bias or unintended outcomes in AI systems and report any concerns to the appropriate team.
- Combine human expertise with AI solutions to achieve meaningful progress, recognizing that technology alone cannot create an inclusive or equitable workplace.
- Protect confidential and sensitive data when using AI and ensure compliance with data privacy and security requirements.

Why this Matters

AI has the potential to positively transform our business, but it must be used thoughtfully and responsibly. By combining diverse human experiences with advanced technology, we can drive innovation while safeguarding our values and reputation. As a developing space, we encourage associates to bring their ideas regarding the use of AI to their managers who can then reach out to the Product and Consulting team for further evaluation.

If you have questions or concerns about the use of AI, contact the Information Security team, Corporate Legal team or the Chief AI Officer. For further information, you may also refer to the Ensono AI Policy, Responsible AI Policy and the Artificial Intelligence Security Policy.



20. Workplace Safety

Ensono is committed to providing a safe, healthy, and secure work environment for all associates, clients, and visitors. We believe that workplace safety is everyone's responsibility and is essential to our success.

Our Commitment

- We comply with all applicable health and safety laws, regulations, and standards in every location where we operate.
- We proactively identify and address potential hazards to prevent accidents, injuries, and illnesses.
- We foster a culture where safety concerns can be raised without fear and are addressed promptly and effectively.

Your Responsibilities

- Follow all safety policies, procedures, and instructions relevant to your role and work environment.
- Immediately report any unsafe conditions, hazards, accidents, or near misses to your manager or the appropriate safety contact.
- Participate in required safety training and use protective equipment as directed.
- Do not engage in behavior that could endanger yourself or others, including violence, threats, or substance abuse in the workplace.
- Cooperate with safety inspections, audits, and investigations.

Why this Matters

A safe workplace protects our people, our clients, and our reputation. By working together to maintain a safe environment, we support each other's well-being and help Ensono achieve its goals. If you have questions or concerns about workplace safety, please refer to the US Associate Support Book, the UK Health and Safety Policy, the Brazil Associate Support Book, Whistleblower Protection Policy, India Prevention of Sexual Harassment Policy, Poland Work Rules Regulation or contact your manager or a member of the Facilities team in your jurisdiction.

IV. Questions & Queries – We're Here to Help

At Ensono, we are committed to fostering an open and ethical workplace. If you have questions about any matters covered in this Code of Conduct and Ethics, we encourage you to reach out to the appropriate team below.

For general inquiries about the Code

- Contact the CPE team at associatequestions@ensono.com

Legal & Compliance Matters

- Contact the Corporate Legal team at corporatelegal@ensono.com

Data Privacy & Cybersecurity

- Contact the Information Security team at cybersecurity@ensono.com or the Privacy Officer at privacyoffice@ensono.com

Artificial Intelligence (AI) Use & Policy Questions

- Contact the Information Security team, Corporate Legal team, or the Chief AI Officer at Jim.Piazza@ensono.com

Environmental, Social & Governance (ESG) Initiatives

- Contact the ESG team at global_esg@ensono.com

Procurement & Supplier Concerns

- Contact the Global Procurement team at GlobalProcurementAll@Ensono.com or the Vendor Management team at vmo@ensono.com

Finance & Treasury

- Contact the SVP of Finance at Megan.Brodale@ensono.com or the Treasury team at Murtaza.Malik@ensono.com / Ankur.Patel@Ensono.com

Marketing and Communications

- Contract the Marketing team at marketing@ensono.com

Thank you for your commitment to upholding Ensono's values of integrity, responsibility, and ethical conduct.