



Cority Software Inc.

VENDOR CODE OF CONDUCT
VERSION 1

| September 2024 |

Vendor Code of Conduct

I. PURPOSE

We, Cority Software Inc. and our affiliated companies (collectively, “we” or “Cority”), are firmly committed to and continuously strive to develop, strengthen and promote a high standard of integrity and ethical business practices in conducting all our business operations. As part of this business initiative, Cority has established this Vendor Code of Conduct (“VCOC” or “Code”) to ensure ethical business activities with respect to human and labor rights, environmental protection, health and safety, data protection and privacy apply across our supply chain.

We recognize the importance of minimizing the impact of our operations on our surroundings by operating in a sustainable manner. We seek to engage and collaborate with suppliers who share our commitment and approach to conducting business. Any supplier of services and/or goods plays a fundamental role in Cority’s success and its business conduct directly reflects on Cority.

As a result, Cority expects its suppliers to meet the minimum standards defined by this Code and fully comply with all applicable laws and regulations when conducting business with Cority.

II. SCOPE

This Code outlines minimum standards and expectations applicable to all suppliers, including their parent entities, subsidiaries, affiliates and subcontractors (“Vendor” or “Vendors”) providing goods or services to Cority, whether through a contract, Order Form or any other agreement (“Agreement”). Vendors will be responsible for all activities associated with disseminating and educating their employees, agents and contractors on this Code, verifying compliance with this Code and taking actions in response to non-compliance.

III. CODE STANDARDS

1. Labor and Human Rights

Vendors must respect human rights in accordance with applicable laws and regulations, including, without limitation, local labor and employment laws and the United Nation’s Universal Declaration of Human Rights, and ensure that they are not complicit in any human rights abuses. Suppliers must ensure their workplaces are free of discrimination and harassment in any form, including verbal, physical, visual or sexual discrimination. Vendors must respect applicable laws, regulations, and requirements related to the topics of modern slavery and human trafficking.

a) Forced and Compulsory Labor

Vendors must respect the freedom of choice of all persons engaged to provide the goods and services to Cority. Vendor employees, agents and contractors must be voluntarily employed, and under no circumstances should any form of forced, coerced, bonded, indentured or involuntary labor or otherwise used. Vendors must not take possession of money or require employees, agents or contractors to surrender any government-issued identification documents or work permits for working assurance.

b) **Child Labor**

A child is any person under the age of majority according to applicable laws and regulations. Vendors must ensure that all employees, agents and contractors meet the legal minimum labor age permitted by applicable law and regulations or countries where the performance, in whole or in part of the contract, takes place. Illicit child labor is strictly prohibited.

c) **Employment Status**

Only employees who are legally authorized to work in Vendors' facilities should be employed. Where permitted by law, Vendors must verify that all employees are legally authorized to work and maintain valid work permits under all applicable laws and regulations.

d) **Freedom of Association**

Employees' right to freedom of association and collective bargaining under applicable laws must be respected. Where these rights are restricted by law, Vendors should not hinder the development of alternative means of independent and free association and bargaining. Vendors must recognize and respect the rights of their employees to associate freely under the applicable laws and regulations.

e) **Working Hours and Rest Days**

Vendors must comply with all applicable laws and regulations with respect to working hours, rest days and overtime. Working hours, including voluntary overtime work, and the granting of leave of any form, must be in accordance with applicable local and/or national laws. Workers shall not work more hours in one week than allowable under local laws. Overtime is to be voluntary, compensated in accordance with the law and must be provided under safe and healthy work conditions.

f) **Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. All employees should be paid a proper and competitive wage which meets their basic needs and provides discretionary income. Vendors must inform their employees of their remuneration conditions in a comprehensible manner.

g) **Non-Discrimination**

As a minimum, Vendors must ensure that their hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, are not subject to discrimination based on race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, pregnancy, marital

status, political opinion, disability, union membership of employee's association or any other category protected by law.

h) Disciplinary Practices

Vendors shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of employees. Employees are not to be exploited or subjected to abuse of any kind, including psychological, physical, sexual or verbal. Intimidation, threat or harassment must not be tolerated, and all disciplinary measures must be compliant with the applicable laws and regulations.

i) Training

Vendors must ensure that their employees are qualified to perform their work and continuously receive appropriate training to carry out their work, including all training required under applicable laws and regulations.

j) Privacy Rights

The privacy rights of all employees must be respected whenever private information is gathered or employee monitoring practices are in place. Vendors must comply with all applicable data protection, anti-spam and privacy laws, including consumer protection laws, in carrying out the services.

2. Health and Safety Standards

Vendors must comply with all applicable health and safety laws. Vendors must ensure the health and safety of all persons within their organization and ensure compliance with all regulatory and statutory health and safety requirements. Vendors must integrate sound health and safety management policies, practices and management systems into their businesses. They must be designed to promote the general health of employees, reduce work-related injuries and illness and ensure the safety and quality of all products and services as specified in the supply agreement.

Vendors shall ensure their employees operate in a safe and healthy working environment and limit any exposure to potential safety hazards. Safety training programs and/or appropriate personal protection gear must be provided when required and/or needed.

Vendors must make a copy of their health and safety policy available to all staff and provide employees with appropriate workplace health and safety training. Additionally, while at any Vendor premises, all Vendors personnel must comply with all applicable health and safety policies. It is of particular importance to Cority that Vendors maintain an alcohol-free and drug-free working environment. Vendors must ensure that their employees, agents and contractors are aware of this policy and maintain a zero-blood alcohol level and remain drug-free at all times while providing goods or services to Cority.

3. Environment Protection

At Cority, we aim to continuously improve our processes and to minimize the negative impacts of our business operations on the global environment. We conduct business with Vendors who share our commitment to establish environmentally responsible business practices and proactively improve our environmental performance. As a minimum, Vendors must:

- a. Conduct their business in accordance with all applicable laws and regulations regarding the protection and preservation of the environment;
- b. Endeavour to reduce operational environmental impacts such as those pertaining to waste disposal, air emissions and pollution, and require their agents, contractors and suppliers to do the same;
- c. Commit to prevent environmental pollution and make continuous improvements in environmental protection;
- d. Establish an environmental policy and management system to ensure compliance with relevant local environmental laws, standards, and regulations and the requirement of this Code, which includes standards related to emissions, discharges, chemical management, waste treatment, and disposal, and usage of resources;
- e. Actively support our goal to establish transparency and traceability within all levels of our supply chain and be willing to share information on the origin of where products and subcomponents are produced; and
- f. Have an environmental policy that is proportionate to the environmental risk of their business operations.

4. Ethical Business Practices

Vendors must adhere to the highest standards of moral and ethical conduct, comply with all applicable laws and regulations and refrain from engaging in any form of corrupt practices, including anti-competitive activities. At a minimum, Vendors must:

- a. Comply with anti-corruption and anti-bribery laws of the countries in which it does business, and not make any direct or indirect payments, including bribes, kickbacks or other promises of payments to foreign government officials or other third parties for the purpose of inducing the individual to misuse their position to obtain or retain business, receive improper benefits or other unfair or improper advantage;
- b. Comply with all applicable environmental laws and regulations, including those relating to hazardous materials, air emissions, waste and wastewater discharges;

- c. Disclose any actual, perceived or potential conflict of interest to Cority, including any employee or contractor of Cority who may have an interest or economic tie of any kind in the Vendor's business; and
- d. Maintain transparent and accurate financial and business records to demonstrate compliance with applicable laws and regulations, as well as generally accepted accounting principles. Such information must be disclosed without falsification or misrepresentation to appropriate parties as required.

Cority is committed to purchasing goods and services from Vendors based on quality and price – free from the influence of any gifts. Accordingly, Vendors shall refrain from offering and giving gifts or other items of value to Cority employees.

IV. APPLICATION OF THE CODE

Cority recognizes that achieving these standards will involve a dynamic process and encourages Vendors as a minimum to:

- a) Meet the standards set forth in this Code, or, where any standards are not met, establish clear goals toward meeting the standards set forth in this Code within an agreed timeframe; and
- b) Actively review, monitor and modify their management processes and business operations to ensure they facilitate continuous improvement.

Vendors shall observe and comply with all applicable laws and regulations in their respective countries of operations. In cases where the standards in this Code differ from national laws or other applicable regulations or standards, Vendors shall abide by the stricter requirements.

V. DUTY TO REPORT

Vendors are directly responsible for promptly reporting to Cority any actual, attempted, or actual violation of law or this Code by Vendors, their employees, agents or contractors. To report any suspected or actual violation of the law or this Code, Vendors must send an email to legal@cority.com.

In cases of violation, Vendors are expected to work expeditiously to implement appropriate corrective measures in accordance with the practices and guidelines provided by Cority.

VI. TRADE, EXPORT CONTROL AND SANCTIONS COMPLIANCE

Vendors must comply with all trade, export control and sanctions laws applicable to their services.

VII. LEGAL COMPLIANCE

Additionally, Vendors are required to acknowledge that they have read and understood this Code. By signing this Code, each Vendor agrees that complying with this Code is a prerequisite for doing business with Cority Software Inc. and our affiliates. This Code is in addition to, and not in lieu of, provisions of any Agreement between a Vendor and Cority.

We expect our Vendors to communicate the requirements of this Code to their own suppliers and contractors and secure their compliance.

Cority reserves the right to audit compliance with this Code by Vendors and Vendors must collaborate with any audit requests made by Cority.

Vendors must maintain and be able to provide Cority with documentation which demonstrates compliance with this Code on request.

If a Vendor violates any of the requirements contained in this Code, it will be regarded as a material breach of all existing Agreements with Cority and Cority reserves the sole right to discontinue business with such Vendor (including, without limitation, terminating any existing Agreements for cause), and Cority shall not be liable for any liability or claims for losses or damages resulting therefrom. This Vendor Code of Conduct does not create any binding obligations on Cority.