



**getronics**

## **Getronics Global Code of Business Conduct**

*"I am proud that this Code sets a global standard for our commitment to business ethics, respect and integrity, qualities that will underpin Getronics future growth and success."*

**Kenton Fine, CEO.**

# CONTENT

## **Letter From The Getronics Board of Management**

### **Global Code Of Business Conduct FAQs**

- Who Must Comply With The Code
- Are There Any Exceptions?
- What If I Have Code Related Questions Or Concerns?
- If You See Something Say Something
- Examples Of Issues Or Concerns
- Your Voice Will Be Heard ... Safely
- Our No-Retaliation Policy

### **Our People, Behaviours And Culture**

- Respect
- Diversity And Inclusion
- Human Rights
- Anti-Discrimination
- Anti-Harassment
- Health & Safety
- Substance Abuse
- Anti-Violence
- Integrity

### **Engaging And Dealing With Customers, Partners And Other Third Parties**

- Responsible Marketing
- Getronics Customers
- Getronics Agents, Contractors, Subcontractors And Consultants
- Getronics Competitors

### **Business Ethics And Integrity**

- Ethics In Getronics Business Activities
- Conflicts Of Interest
- Anti-Corruption
- Anti-Bribery
- Anti-Money Laundering
- International Trade Controls
- Political Activities

- Business Gifts
- Financial Integrity & Responsibility
- Signing A Contract
- Accurate Business Records
- Public Disclosures
- Records Management
- Audits And Investigations
- Getronics Resources
- Fraud

### **Disclosure Of Personal & Corporate Data, IP And Communications**

- Confidential Information
- Getronics Email, Internet And Information Systems
- Privacy
- External Communications
- Intellectual Property
- Investigating Misconduct
- Disciplinary Actions
- Getronics Code Is Not A Contract
- Issuance Of Amendments To This Code
- Administration of this Code
- Acknowledgement
- Disclosure of Waivers

## Letter from the Getronics Board of Management

**Dear valued colleague,** agent, contractor, consultant and sub-contractor

At Getronics, we believe that acting ethically and responsibly is crucial to the success of our people, our company, our customers and communities. This Getronics Global Code of Business Conduct (the "**Code**") is the guide for doing things the right way.

Getronics measures itself against the highest possible standards of ethical business conduct. Our reputation for acting ethically and responsibly is upheld one decision at a time, every day, by every member of our global family.

Each of us, regardless of our position or role in the company, is expected to act with integrity. It is up to us all to lead by example. The Code serves as a guidepost for every Getronics colleague worldwide (including officers and colleagues of Getronics subsidiaries, branches and affiliates), Getronics agents, contractors, subcontractors, consultants and the Getronics Board of Management. The Code governs every decision we make and every action we take.

As a global business, Getronics is committed to compliance with The Code and with the laws of the countries in which we operate. Global laws and regulations can be complex. The Code helps ensure that each of us remain in complete compliance, and sets the ethical benchmark for becoming the best performing, most trusted and respected IT Services company in the world.

If you have any questions regarding the Code then please contact your line manager, Human Resources or the Legal Department. If you believe another Getronics colleague, agent, contractor, consultant and sub-contractor - or Getronics itself - is falling short of Getronics' commitment to the Code, please raise the issue immediately by contacting your line manager (if appropriate), Human Resources, the Legal Department, or report by web or phone through our external agency using the following link <https://getronicsethics.com>

Thank you for your commitment to the Code, and for your continued engagement with Getronics.

Together, as active participants within the Getronics' family, our continued success is assured.

Sincerely,



# 1 GLOBAL CODE OF BUSINESS CONDUCT FAQ'S

## Who Must Comply With The Code?

**The Code is written for all Getronics colleagues, which includes both our brands of Getronics and Connectis.** Further, Getronics mandates that any agent, contractor, subcontractor or consultant (whether temporary or permanent) who is performing work or services for or on behalf of Getronics or representing Getronics in any way, will also comply with the Code.

## Are There Any Exceptions?

**No.** Getronics expects all its colleagues, agents, contractors, subcontractors and consultants to know and comply with the Code. Failure of a Getronics colleague to comply with the Code may result in disciplinary action, including termination of employment, failure of an agent, contractor, subcontractor or consultant to comply with the Code will, notwithstanding any term or condition to the contrary, likely result in Getronics terminating its relationship.

## What If I Have Code-Related Questions or Concerns?

The Code, by its very nature, cannot describe every possible situation that you might encounter in your daily work. If you cannot find an answer in the Code, or if you have questions on how to interpret the Code, or you need to seek advice, you should contact either your line manager, Human Resources or the Legal Department.

## If You See Something, Say Something

If you have a concern, become aware of a potential violation of the Code, Getronics policies, or the law, or you need to disclose a potential conflict of interest you must speak up, take action and report it so it can be properly investigated and addressed. In any of these circumstances you should contact either your line manager (if appropriate), Human Resources, the Legal Department, or report by web or phone through our external agency using the following link <https://www.getronicsethics.com>

## Examples of Issues or Concerns

- Accounting or auditing irregularities or misrepresentations;
- Fraud, theft, bribery or other corrupt business practices;
- Human rights violations;
- Illegal discrimination, bullying or harassment;

- Actual or potential conflicts of interest, and/or
- As otherwise set out in the Code.

### Your Voice Will be Heard ... Safely

To assist Getronics in investigating your report, you are encouraged to communicate all the information you feel comfortable providing. The information will be kept confidential, except as needed to conduct a full and fair investigation. You may remain anonymous if you so choose except where restricted by local law. What matters is what is being reported, **not who reports it.**

### Our No-Retaliation Policy

Getronics prohibits retaliation against any Getronics colleague who reports what they believe is a violation of the Code or the law; who raises a compliance question or seeks advice regarding a business practice, decision or action; or who participates in an investigation of a possible violation of The Code, policies, or the law. Retaliation against someone reporting an issue in good faith is itself a violation of the Code. If you believe you are being retaliated against, you should report it.

---

***YOU MADE A COMPLAINT ABOUT YOUR MANAGER AND YOU ARE NOW WORRIED THAT THEY MAY START TREATING YOU DIFFERENTLY AS A RESULT. WHAT CAN YOU DO?***

***GETRONICS WILL NOT TOLERATE RETALIATORY ACTION FOR MAKING GOOD FAITH COMPLAINTS. MANAGERS WHO RETALIATE WILL BE SUBJECT TO CORRECTIVE ACTION, INCLUDING POSSIBLE TERMINATION OF THEIR EMPLOYMENT.***



## 2 OUR PEOPLE, BEHAVIOURS AND CULTURE

### Respect

One of the guiding principles of Getronics is to respect others. Getronics treats everyone, both within and outside of Getronics, with respect.

### Diversity and Inclusion

At Getronics, we define “diversity” as all the unique characteristics that make up each of us: personalities, lifestyles, thought processes, work experiences, ethnicity, race, colour, religion, gender, gender identity, sexual orientation, marital status, age, national origin, disability, or other differences.

Getronics strives to attract, develop and retain a workforce that is as diverse as the markets we serve, and to ensure an inclusive work environment that embraces the strength of our differences.

All Getronics colleagues play an important role in creating a work environment in which Getronics colleagues, agents, contractors, subcontractors and consultants feel valued and respected for their contributions. You promote diversity and inclusion when you:

- ✓ **Respect the diversity of each other’s talents, abilities and experiences;**
- ✓ **Value the input of others; and/or**
- ✓ **Foster an atmosphere of trust, openness and candour.**

We will better understand the needs of Getronics customers, agents, contractors, subcontractors, consultants and the marketplace, as well as foster innovation, if each of us embraces diversity and inclusion in all aspects of the Getronics business.

---

### **WHAT IF I RECEIVE AN E-MAIL THAT INCLUDES OFFENSIVE JOKES OR LANGUAGE?**

*JOKES THAT WOULD BE REASONABLY VIEWED AS OFFENSIVE ARE NOT ACCEPTABLE AND SHOULD NOT BE SENT THROUGH THE COMPANY E-MAIL SYSTEM. YOU MAY REPORT THIS TYPE OF E-MAIL UNDER THE CODE AND/OR INFORM THE PERSON WHO SENT IT THAT YOU FIND IT OFFENSIVE.*

---

## Human Rights

Getronics recognizes the importance of maintaining and promoting fundamental human rights in Getronics operations and supply chain, and Getronics is committed to respecting the rights of workers throughout our value chain. Getronics supports the principles contained in the United Nations' International Bill of Human Rights and the Declaration on Fundamental Principles and Rights at Work. Getronics operates under programs and policies that:

- ✓ **Promote a workplace free of discrimination and harassment;**
- ✗ **Prohibits child labour, forced labour and human trafficking;**
- ✓ **Provide fair and equitable wages, benefits and other conditions of employment, in accordance with local laws;**
- ✓ **Provide humane and safe working conditions, including safe housing conditions, where applicable; and**
- ✓ **Recognise colleagues' right to freedom of association and collective bargaining.**

Getronics expects its agents, contractors, subcontractor and consultants to uphold these principles and comply with the Code, in order to minimize the risk of human rights abuses throughout the Getronics supply chain.

Always check your actions to ensure that they do not violate or contradict any of the basic human rights principles noted above. If you suspect a human rights violation within Getronics operations or supply chain, speak up and report it.

## Anti Discrimination

Each of us should have the opportunity to reach our full potential and contribute to Getronics' success. To accomplish this, you should never discriminate or treat colleagues or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment. **Your employment decisions must always be based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as:**

- **Race, colour, ethnicity, or national origin**
- **Gender or gender identity**
- **Sexual orientation**
- **Age**
- **Religion**
- **Disability**
- **Personal Relationship and/or friendship**

- **Any other legally protected status**

Making employment decisions based on any of these personal characteristics is always against Getronics' policies and is illegal under the laws of many countries. You must always act fairly and give qualified individuals the chance to develop their abilities and advance within Getronics.

## **Anti-Harassment**

Getronics seeks to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. Getronics complies with all country and local laws prohibiting harassment. This Code prohibits all forms of harassment.

Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, we consider the following non-exhaustive list to be unacceptable behaviour:

- ✗ **Sexual harassment;**
- ✗ **Offensive language or jokes;**
- ✗ **Racial, ethnic, gender or religious slurs;**
- ✗ **Degrading comments;**
- ✗ **Intimidating or threatening behaviour; and/or**
- ✗ **Showing Hostility towards others because of individual characteristics.**

You should never act in a harassing manner or otherwise cause your colleagues to feel uncomfortable. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

**If you or someone else is the subject of discrimination or harassment, speak up and report it.**

---

***ONE OF MY MANAGERS ASKED ME ON SEVERAL OCCASIONS TO MEET FOR DRINKS AFTER WORK, AND I HAVE REPEATEDLY SAID "NO", HE ALSO MENTIONED IT MAY LEAD TO A PAY INCREASE. IS THIS OK? I FEEL UNCOMFORTABLE WITH THIS BEHAVIOUR.***

*YOU SHOULD REPORT THIS TYPE OF BEHAVIOUR.*

***A COLLEAGUE TOLD YOU THAT A CUSTOMER HAS MADE UNWANTED SEXUAL ADVANCES TOWARDS THEM HOWEVER***

**THEY DID NOT FEEL COMFORTABLE TELLING THEIR MANAGER.  
SHOULD YOU DO ANYTHING?**

*YES, ALL COLLEAGUES HAVE A RESPONSIBILITY TO REPORT  
POTENTIAL VIOLATIONS OF THE CODE.*

**MY MANAGER GAVE ME A HUG. IS THIS ACCEPTABLE?**

*THIS MAY BE UNWELCOME OR UNWANTED CONDUCT, DEPENDING ON  
THE PERSON RECEIVING OR WITNESSING THE CONDUCT. WHAT MAY  
BE THE GOOD INTENTIONS OF THE MANAGER MAY BE THE BASIS OF  
SEXUAL HARASSMENT. IF YOU FEEL UNCOMFORTABLE WITH IT  
REPORT IT. REMEMBER: WHAT MAY BE ACCEPTABLE TO ONE PERSON  
MAY NOT BE ACCEPTABLE TO ANOTHER.*

---

## **Health and Safety**

Getronics is committed to the health and safety of Getronics colleagues, visitors, agents, contractors, subcontractors, consultants, customers and communities. Our health and safety policies and procedures are designed to help you to work safely whilst performing your role.

You should always speak up and raise a concern if you are asked to:

- **Perform a task you consider unsafe; and/or**
- **Do a job you think you are not properly trained to perform and that may harm you or others.**

You should raise a concern if you:

- **See someone performing a task that you think is unsafe or that the person is not properly trained to do;**
- **Suspect that a vehicle or piece of equipment is not operating properly and may be unsafe; and/or**
- **Observe or are made aware of an unsafe condition or a potential danger to yourself or others.**

Safety is everyone's responsibility – you must insist that work be performed safely, no matter your role or your position in Getronics.

## Substance Abuse

If you have a drug or alcohol problem, you are encouraged to seek assistance. Contact Human Resources to learn of applicable assistance programs in your region.

If, due to the influence of drugs or alcohol (whilst you are representing Getronics) your behaviour becomes unacceptable, inappropriate or you pose a risk to yourself for others, this will be a violation of the Code. Drugs may include illegal drugs, controlled substances or misused prescription medication. You are expected to represent Getronics and perform your role free from the influence of any substance (including alcohol) that could impair your performance or cause unacceptable and/or inappropriate behaviour.

Whilst representing Getronics, you are prohibited from:

- ✘ Being under the influence of alcohol, illegal drugs or controlled substances;**
- ✘ Possessing, selling, using, transferring, or distributing illegal drugs or controlled substances; and/or**
- ✘ Performing your role while impaired by a lawful prescription medication or over-the-counter drug.**

## Anti-Violence

Getronics has a zero-tolerance policy for violence in the workplace and/or whilst representing Getronics in any capacity. You are prohibited from engaging in any act that could cause another colleague to feel threatened or unsafe. This includes verbal or physical assaults, threats or any expressions of hostility, intimidation, aggression or humiliation.

Getronics also prohibits the possession of any weapons. To the full extent permitted by local law, this prohibition extends to Getronics offices, car parks, facilities or whilst representing Getronics in any capacity

**DON'T DELAY! – Report threats or acts of violence immediately.**

## Integrity

It is Getronics policy to treat all those we encounter in the marketplace with fairness and integrity. This includes Getronics customers, competitors, agents, contractors, subcontractors and consultants; and the communities we serve. Underlying this commitment to integrity is Getronics' obligation to comply with all applicable laws wherever we do business.

## 3 ENGAGING AND DEALING WITH CUSTOMERS, PARTNERS AND OTHER THIRD PARTIES

### Responsible Marketing

Getronics brands touch millions of people each day. Getronics' marketing and sales material must reflect Getronics' high ethical standards and be truthful, understandable and in compliance with all laws. If you are involved in marketing or selling, you should **never**:

- ✗ **Overstate or misrepresent the qualities of Getronics products or services;**
- ✗ **Use misleading or untruthful statements; and/or**
- ✗ **Make claims about Getronics products or services without adequate substantiation.**

### Getronics Customers

Integrity in the marketplace requires each of us to treat Getronics customers ethically, fairly, and in compliance with all applicable laws.

When dealing with Getronics customers, you should always:

- ✓ **Win business based on Getronics' superior offerings, customer service and competitive prices;**
- ✓ **Present Getronics services and products in an honest and forthright manner;**
- ✓ **Avoid unfair or deceptive trade practices;**
- ✓ **Communicate Getronics' sales programs clearly; and**
- ✓ **Deliver on your promises.**

Getronics' contracts with its customers must always reflect the importance and value we place on their business. All customer contracts must be in writing and conform to Getronics policies and contracting principles, be approved in writing by the appropriate Getronics functions and the Legal Department and be signed by a Director or authorised signatory. You should never start, or request any colleague, agent, contractor, subcontractor or consultant to start performing any work for a customer (including pilots or due diligence), or place an order on behalf of a customer, unless you have confirmed there is a signed contract in place with the customer that specifically covers the scope of work you intend to perform or goods you intend to order. Please note, without written approval from the Legal Department, you should not start performing work or place an order if you only have a customer purchase order.

## Getronics Agents, Contractors, Subcontractors and Consultants

Getronics holds its agents, contractors, subcontractors and consultants to the same standards of integrity to which Getronics holds itself. An unethical or illegal act of an agent, contractor, subcontractor or consultant may damage Getronics' reputation as a world-class company and cause the loss of goodwill in the communities we serve. Therefore, all agents, contractors, subcontractors and consultants must comply with the Code as a condition of doing business with Getronics.

- ✓ **If you are responsible for selecting an agent, contractor, subcontractor or consultant, you should base your decision on merit, quality of service and reputation only.**

---

***A SALES MANAGER HAS CONTRACTED WITH A THIRD-PARTY AGENT TO HELP THEM GROW THE BUSINESS. DO THEY NEED TO OBTAIN PRIOR APPROVAL?***

*YES. PRIOR TO RETAINING ANY THIRD-PARTY AGENT, THE LEGAL DEPARTMENT MUST PERFORM A DUE DILIGENCE EVALUATION ON THE PROSPECTIVE AGENTS TO ENSURE THAT THE AGENT IS BONA FIDE AND IS AWARE OF THE CODE.*

---

## Getronics Competitors

Getronics is committed to outperforming its competitors legally and, therefore, you must:

- ✗ **Never comment on competitors' products or services in an inaccurate or untruthful manner;**
- ✓ **Only use legitimate means of obtaining competitive information;**
- ✓ **Respect the confidential information and intellectual property rights of Getronics competitors and other third parties; and**
- ✓ **Always comply with antitrust and competition laws.**

When dealing with Getronics competitors (even if you have a personal relationship with them), you should never enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale, coordinate bids, allocate customers, sales territories, or product lines, or engage in any other activity that violates applicable antitrust or competition laws.

You should never discuss such topics with a Getronics competitor, even in an informal setting such as a bar, restaurant, trade show or customer event.

It is also important to avoid activities that may appear to violate antitrust or competition laws. For example, all written communications referring to Getronics competitors should be business appropriate and refrain from language that could be construed as encouraging anti-competitive behaviour.

Violations of antitrust or competition laws may result in severe legal penalties for Getronics and criminal charges for the individuals involved. Competition laws are complex and vary by country.

For guidance or questions on antitrust or competition, you should seek advice. **If you suspect an antitrust violation, speak up and report it.**

---

***A COLLEAGUE IS MEETING A FRIEND WHO WORKS AT A COMPETITOR COMPANY. THEY WANT TO BID FOR A CUSTOMER CONTRACT TOGETHER AND AGREE TO SHARE THEIR PRICING WITH EACH OTHER TO ELIMINATE OTHER COMPETITORS. IS THIS ACCEPTABLE?***

***NO, THIS BEHAVIOR IS ANTI-COMPETITIVE AND UNLAWFUL. ANY SUCH BEHAVIOR MUST BE REPORTED IMMEDIATELY.***

---



## 4 BUSINESS ETHICS AND INTEGRITY

### Ethics in Getronics Business Activities

Each of us should make **ethical business decisions** and **avoid conflicts of interest**. We want to do business the right way. Getronics' commitment to ethics and integrity extends to all Getronics business relationships and interactions, including potential relationships with government officials.

### Conflicts of Interests

We have an obligation to always act in the best interest of Getronics. Conflicts of interest may arise when you, a family member or a friend:

- ✗ Let your business decisions be influenced, or appear to be influenced, by personal or family interests or friendships;**
- ✗ Use Getronics property, information, time or resources for personal benefit or the benefit of a third party;**
- ✗ Hire, supervise or have a direct or indirect line of reporting to a family member, friend or someone with whom you have a romantic relationship;**
- ✗ Working part-time at an third party that sells products or services that compete with Getronics (even during your time off), accepting consulting fees, providing advice or services to a third party for personal gain, owning or managing part of a business that sells goods or services to Getronics, accepting payment from a third party for information about Getronics, starting a company that provides products or services similar to Getronics**
- ✗ Posting a defamatory message about Getronics on social media, failing to report a colleagues wrongdoing due to a personal relationship, making a purchase or business choice to boost a business that you have a stake in, taking advantage of confidential information learned in the course of your employment for your own benefit; and/or**
- ✗ Work for, provide services to, represent or have a financial interest in or receive any personal benefit from an agent, contractor, subcontractor, consultant, customer, competitor or a company that does or seeks to do business with Getronics, if such relationship or interest could influence, or appear to influence, your business decisions.**

**In general, it will not pose a conflict of interest if you, a friend or a family member have a nominal stock ownership interest (generally, less than a 1% equity interest) in a contractor, subcontractor, customer or competitor, unless that equity interest constitutes more than a small portion of your overall**

**investment portfolio and thus creates the potential for the appearance of a conflict of interest.**

You must disclose potential conflicts of interest in writing. **Remember, having a conflict of interest is not necessarily a violation of this Code, but failing to disclose a conflict is.**

If at any time in your employment you have a potential or actual conflict of interest, you have an obligation to disclose it promptly in writing so that a determination can be made as to the extent and potential impact of the conflict on Getronics. Many times, conflicts can be resolved by an open and honest discussion. Certain material conflicts may require the acknowledgement of your confidentiality obligations, reassignment of roles, or refusal from certain business decisions.

---

***IF MY FRIEND'S SON WANTS TO APPLY FOR A POSITION IN GETRONICS, CAN I FORWARD HIS CV?***

*YES. COLLEAGUE REFERRALS ARE FINE; HOWEVER, THE APPLICANT SHOULD STILL APPLY FOR THE ROLE THROUGH GETRONICS STANDARD RECRUITMENT PROCESS.*

---

### **Anti-Corruption**

Corrupt arrangements with customers, agents, contractors, subcontractors, consultants, government officials, or any other third parties are strictly prohibited. “**Corruption**” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Corruption may involve payments or the exchange of anything of value and includes the following activities:

- ✗ Bribery (governmental or commercial);**
- ✗ Extortion; and/or**
- ✗ Kickbacks**

Corrupt activities are not only a Code violation, they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws in various countries. **Should you become aware of any potential or actual corrupt arrangement or agreement, speak up and report it.**

### **Anti-Bribery**

No matter where in the world you work, there is an anti-bribery law or policy that applies to you. Most countries have anti-bribery laws that prohibit bribing a government official. Under some countries’ laws, such as the United Kingdom’s Bribery Act, bribing anyone (called “**Commercial Bribery**”) is also a crime. In addition, all Getronics colleagues,

regardless of personal location or place of business, must comply with all anti-bribery legislation including but not limited to the U.S. Foreign Corrupt Practices Act (“**FCPA**”).

**To comply with anti-bribery laws, no colleague should ever offer, directly or indirectly, anything of value, including a gift or entertainment, to any government official or his or her representatives to:**

- **Obtain or retain business;**
- **Influence business decisions; and/or**
- **Secure an unfair business advantage.**

These prohibitions apply to Getronics business operations and to anyone representing Getronics or acting on Getronics’ behalf, including agents, contractors, subcontractors and consultants.

Note: that a government official may be interpreted broadly to include numerous people in numerous roles. Please seek advice, not all government payments are problematic. For example, payments may be made to a government entity in the normal course of business, such as to pay taxes or when the government entity is a customer or supplier. However, payments of any kind for bribes or facilitating payments to government officials are prohibited, and both bribes and facilitating payments are considered a violation of Getronics’ Global Anti-Bribery Compliance Policy.

Accordingly, all references within this Code to a bribe also include facilitating payments. If you receive a request from a government official for a bribe, you must decline to make the payment. If you reasonably believe that failure to make the payment may jeopardize your health or safety, you may make the payment. You must promptly report any demands for a bribe, or the actual payment of a bribe made under coercion.

All payments, both direct and indirect, made to government officials must be accurately recorded in Getronics’ financial books and records.

If you are unsure whether you might be dealing with a government official or have any other questions on complying with anti-bribery laws, you should seek guidance. Always speak up and report any suspected bribery activity.

## **Anti-Money Laundering**

Getronics complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. “**Money Laundering**” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

**You should always ensure that you are conducting business with reputable customers, for legitimate business.**

Check for “**red flags**” such as requests from a potential customer, agent, contractor, subcontractor or consultant for cash payments or other unusual payment terms. **If you suspect money laundering activities, speak up and report it.**

## International Trade Controls

As a global company, Getronics transfers goods, services and technologies across national borders. Getronics business transactions are subject to various sanctions or trade controls and laws, including:

- **Government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts; and**
- **Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the U.S. government.**

Getronics is committed to ensuring that these business transactions are accomplished in full compliance with applicable sanctions or trade controls and laws.

If you are involved in the transfer of goods, equipment (or its components), licences or services across national borders on behalf of Getronics or Getronics customers, you must comply with these laws, regardless of where you are located. If U.S. law conflicts with a local trade law, U.S. law may apply.

**Always consult with the Legal Department for proper guidance on international trade controls.**

## Political Activities

Getronics encourages its associates to participate in their communities, which may include political activities.

**However, you may not use Getronics funds, time or resources, or receive Getronics reimbursement, for any political activities, including contributions to political candidates or parties. You should avoid even the appearance of doing so.**

On occasion, Getronics may communicate information and its corporate opinions on issues of public concern that affect Getronics.

These announcements are not intended to pressure you to adopt certain ideas or support certain causes. Your decisions to contribute your own time or money to any political or community activity are entirely personal and voluntary.

Getronics obeys all laws in promoting Getronics' position relative to government authorities and in making political contributions. Corporate political contributions are strictly regulated and must always be approved by the Legal Department.

## Business Gifts

The practice of giving business gifts to Getronics customers or receiving business gifts from Getronics agents, contractors, subcontractors and consultants (whether existing or potential) requires careful consideration by you and your line manager. Before any gift is given or received, you should determine if it is permitted under this Code and Getronics' policies, including applicable sector or function policies.

You are prohibited from providing, offering, or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage. However, under certain circumstances, you may exchange business gifts that are intended to generate goodwill, provided:

- ✓ **The gift is given in good faith, without expecting any return favour or improper benefit or business advantage;**
- ✓ **The gift is of nominal value (generally under €25 EURO or its local equivalent);**
- ✓ **The gift is provided openly and transparently and given on behalf of Getronics, not on behalf of any individual;**
- ✓ **The gift is reasonable and customary, is given infrequently, and does not otherwise create the appearance of impropriety;**
- ✓ **The gift is not cash or a cash equivalent and meets all other requirements of Getronics policies, including travel policies and Anti-Bribery portions of this Code;**
- ✓ **Your division or function does not have a "no gifts" policy in effect; and**
- ✓ **The gift is permitted under the laws that apply to the recipient, and the recipient of the gift is authorized and permitted to accept the gift.**

"Business gifts" do not include Getronics approved sponsored events or Getronics branded marketing gifts. In addition, business hospitality, including meals and entertainment, is not prohibited if the nature and frequency of the occasion is reasonable, the occasion involves the active conduct of Getronics business, and the business hospitality otherwise complies with Getronics policies.

**Gifts and entertainment to government officials:** You should be aware that giving or offering even a simple gift or meal to a government official can be illegal. You must obtain prior written approval from the Legal Department before giving or offering any gift, meal or entertainment to a government official.

## Financial Integrity and Responsibility

Acting with responsibility and transparency goes hand in hand with protecting Getronics' value. Each Getronics colleague creates value by putting Getronics' interests first, maintaining accurate business records and protecting and properly using Getronics' resources, information and property.

---

***A SALES COLLEAGUE REQUESTS A CUSTOMER TO PLACE A PRODUCT ORDER THEY NEED NOW, ADVISING THE CUSTOMER THAT THEY CAN RETURN IT AT A LATER TIME. IS THIS ACCEPTABLE?***

*NO. THIS BEHAVIOUR MANIPULATES THE RECORDING OF REVENUE AND WOULD VIOLATE THE CODE.*

---

### **Signing a Contract**

Where Getronics is transacting with a third party, the agreement must be in writing and comply with Getronics policies and contracting principles. All agreements must be reviewed and approved in writing by the appropriate Getronics functions and the Legal Department prior to the agreement being signed (digitally or otherwise) by a Director or authorised signatory.

#### **You should:**

- **Never sign any document, or accept online terms and conditions on behalf of Getronics unless you are a Director or have a power of attorney authorising you to represent/bind Getronics;**
- **Never sign any document or request a document be signed unless the content of the document has been reviewed and approved in writing by the appropriate Getronics functions and the Legal Department and you are acting in Getronics best interests;**
- **When requesting a signature, you must provide the Director or authorised signatory with confirmation that the appropriate business functions and the Legal Department have given their written approval, and never withhold or provide misleading information in order to obtain a signature.**

---

***I HAVE JUST NEGOTIATED A CONTRACT FOR GETRONICS, AND THE CUSTOMER HAS FORWARDED THE CONTRACT TO ME FOR SIGNATURE. CAN I SIGN?***

*NO, THE ONLY INDIVIDUALS THAT CAN SIGN CONTRACTS BINDING GETRONICS ARE DIRECTORS AND THOSE THAT HAVE BEEN PRE-AUTHORIZED TO DO SO. SIGNING WITHOUT AUTHORIZATION IS A DISCIPLINARY MATTER AND YOU MAY FIND YOURSELF PERSONALLY LIABLE.*

---

## Accurate Business Records

Getronics' focus on speaking with truth and candour underscores Getronics' commitment to accuracy in Getronics' books and records. Business records, including Getronics financial statements, travel expenses, contracts and agreements, must always be accurate and reflect a forthright presentation of the facts. No matter what type of document or how insignificant it might seem, the information contained in a business record must always be truthful and complete. Financial records must reflect all components of financial transactions and events. Likewise, all your transactions, no matter the dollar amount, must be properly authorized, executed and recorded.

In addition, anything provided to a government official must be properly and accurately recorded in Getronics' business records.

You are accountable for the accuracy of the business records that you handle in the normal course of business. You should never:

- ✗ Falsify, omit, misstate, alter or conceal any information, or otherwise misrepresent the facts, on a Getronics record; and/or**
- ✗ Encourage or allow anyone else to compromise the accuracy and integrity of Getronics records.**

**If you notice an inaccuracy in a Getronics records, or a failure to follow Getronics' internal control processes, you must promptly speak up and report it.**

---

**MY MANAGER IS PUTTING PRESSURE ON ME TO RECORD NUMBERS THAT ARE NOT ACCURATE. SHALL I REPORT THIS?**

*YES, THIS SHOULD BE REPORTED. IT IS IMPORTANT THAT ALL NUMBERS RECORDED ARE ACCURATE. MISLEADING NUMBERS COULD CONSTITUTE FRAUDULENT BEHAVIOR.*

**A COLLEAGUE HAS MADE A BUSINESS TRIP AND DOES NOT HAVE ALL THE RECEIPTS. HE HAS CREATED THE RECEIPT INSTEAD. IS THIS ACCEPTABLE?**

*FALSIFYING RECORDS INCLUDING EXPENSE REPORTS IS A VIOLATION, ALTHOUGH WE UNDERSTAND RECEIPTS MAY BE LOST. THERE IS A SEPARATE PROCESS FOR THIS, AND FINANCE SHOULD BE ADVISED OF ANY MISSING EXPENSE IN ADVANCE.*

---

## Public Disclosures

The disclosures Getronics makes in any public communication, regulatory disclosure or report submitted to any governmental agency must always be full, fair, accurate, timely and understandable.

If you are involved in any aspect of preparing Getronics' financial statements, or the certifications on which they rely, you must always follow Getronics' financial policies, Getronics' system of internal controls and generally accepted accounting principles.

## Records Management

The size of Getronics generates a large volume of records and documents each day. The business records that you work with must be maintained, retained and destroyed in accordance with all legal and regulatory recordkeeping requirements. To manage your business records properly, you should comply with Getronics' records management and retention policies for all documents, files, electronic records and emails. **You should consult the Legal Department if you have specific questions about the retention period of a document, or if you have questions concerning the maintaining of documents.** Destruction of documents, even inadvertently, could expose Getronics and you to civil and criminal liability

## Audits and Investigations

During your employment with Getronics, you may be asked to participate in an audit or internal investigation conducted by Getronics' internal auditors, external auditors, by Human Resources or the Legal Department. When this happens, you are always expected to cooperate fully and communicate honestly.

You may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or government investigation. If you receive such a request, you should immediately contact the Legal Department for guidance.

## Getronics Resources

Getronics relies on you not to take and to use Getronics resources honestly and efficiently. Resources include physical property, such as facilities, supplies, equipment, machinery, spare parts, raw materials, finished products, vehicles and Getronics funds. They also include intangible assets, such as Getronics' time, confidential information, intellectual property and information systems. **You should not take and use Getronics resources only for legitimate business purposes and protect them from theft, loss, damage, or misuse.**

The obligation to protect Getronics funds is particularly important if you have spending authority, financial approval authority, access to Getronics bank accounts, approve travel and entertainment expenses, or manage budgets and accounts. You must always:

- ✓ **Ensure the funds are properly used for their established purpose;**
- ✓ **Obtain required approval before incurring an expense;**
- ✓ **Accurately record all expenditures; and/or**
- ✓ **Verify that expenses submitted for reimbursement are business-related, properly documented and comply with Getronics policies.**

**If you become aware of Getronics resources being misused, you must speak up and report it.**

## **Fraud**

You misuse Getronics resources – and commit fraud – when you intentionally conceal, alter, falsify or omit information for your benefit or the benefit of others. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline). Examples of fraud include:

- ✗ **Altering manufacturing numbers to meet productivity goals;**
- ✗ **Presenting false medical information to obtain disability benefits;**
- ✗ **Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work;**
- ✗ **Misrepresenting sales information to obtain unauthorized pricing for a customer; and/or**
- ✗ **Misstating financial information**

**You should also avoid the appearance of fraud.** For example, never spend Getronics funds without proper written approval. Similarly, never enter into an agreement, either written or verbal on behalf of Getronics unless you are authorised to do so.



## 5 DISCLOSURE OF PERSONAL & CORPORATE DATA, IP AND COMMUNICATIONS

### Confidential Information

During your employment, you may acquire certain information about Getronics, its customers, agents, contractors, subcontractors and consultants or another third party that is confidential, competitively sensitive and/or proprietary. You should always assume that any information you acquire in performing your work is confidential or competitively sensitive unless you have clear indication that it is not.

Always take reasonable and necessary precautions to protect any confidential information relating to Getronics customers, agents, contractors, subcontractors and consultants or another third party to which you receive or have access. **You should not disclose any confidential business information to anyone outside Getronics, even to members of your own family, unless the disclosure is:**

- ✓ **Properly authorised**
- ✓ **In connection with a legitimate business need; and/or**
- ✓ **Subject to a written confidentiality agreement approved by the Legal Department.**

Even within Getronics and among your colleagues, only share confidential information on a need-to-know basis, where there is a legitimate business reason to know the information.

This obligation of confidentiality does not prohibit you from raising concerns about potential Code or legal violations either within Getronics or to a government authority. Your ability to report legal violations internally within Getronics or to a government authority, either during or after your employment with Getronics, is not prohibited by this Code or any other Getronics policy or agreement.

---

### **WHAT IF I RECEIVE A CALL REQUESTING ME TO PROVIDE INFORMATION ON A FELLOW COLLEAGUE?**

*YOU SHOULD NOT DISCLOSE PERSONAL DETAILS OR WORK INFORMATION ABOUT OTHER COLLEAGUES IF YOU ARE UNCERTAIN ABOUT THE CALLER'S IDENTITY. NEVER DISCLOSE COLLEAGUES' PHONE NUMBERS, EMAIL ADDRESSES AND/OR REPORTING STRUCTURES.*

***A COLLEAGUE IS WORKING ON A POTENTIAL ACQUISITION AND HAS FORWARDED TO ME CONFIDENTIAL INFORMATION RELATING TO THIS ACQUISITION. DO I REPORT IT?***

*YES, ALL INFORMATION RELATING TO A POTENTIAL ACQUISITION IS PROTECTED AS CONFIDENTIAL INFORMATION. ALL COLLEAGUES WORKING ON POTENTIAL ACQUISITIONS ARE SUBJECT TO THE TERMS OF A CONFIDENTIALITY AGREEMENT, RESTRICTING DISCLOSURE OF ANY DETAILS RELATING TO THE ACQUISITION. THIS BEHAVIOR SHOULD BE REPORTED.*

---

**Getronics Email, Internet and Information Systems**

You must use Getronics systems, tools, devices, time and resources responsibly and protect the security of Getronics. Getronics systems, tools, devices and resources constitute a critical component of Getronics' business operation and are provided for authorized business purposes only. Your use of Getronics systems, tools, devices, time and resources must comply with this Code, and other applicable security policies and acceptable use standards. **You may engage in reasonable incidental personal use of your Getronics systems, tools, devices, time and resources if such usage does not:**

- ✗ Consume a large amount of time or resources;**
- ✗ Interfere with your work performance or that of others;**
- ✗ Involve illegal, sexually explicit, political, discriminatory or otherwise inappropriate material;**
- ✗ Relate to outside business interests; and/or**
- ✗ Violate this Code or any other Getronics policy.**

While it is generally not Getronics' practice to monitor its colleagues use of Getronics information systems, Getronics reserves the right to monitor, record, disclose, audit, and delete without prior notice the nature and content of any Getronics colleague's activity using Getronics email, phone, voicemail, internet and other Getronics systems, to the extent permitted by local law

---

***WHAT IF I DO PERSONAL ACTIVITIES ON A GETRONICS COMPUTER OR WORK PHONE?***

*GENERALLY, LIMITED PERSONAL USE OF GETRONICS RESOURCES/ PROPERTY IS PERMITTED, AS LONG AS IT DOES NOT CREATE A COST FOR GETRONICS AND WORK IS NOT DISRUPTED.*

---

## Privacy

Personal information broadly refers to any information that identifies or relates to an identifiable person. If you access this type of information or the systems that maintain it, you must comply with all applicable policies and laws regarding the processing of such information. You must:

- ✓ **Only access, collect and use personal information that you need and are authorized to see for legitimate business reasons;**
- ✓ **Disclose personal information only to authorized persons who have a legitimate business reason to know the information and who are obligated to protect it;**
- ✓ **Securely store, transmit and destroy personal information in accordance with applicable policies and laws; and/or**
- ✓ **Promptly report any actual or suspected violations of Getronics policies, data breaches, or other risks to personal information to the Legal Department.**

Getronics' Privacy Policies establish a globally consistent foundation for Getronics information collection, handling and use practices. Further, Getronics is committed to complying with applicable privacy laws in the countries where Getronics conducts business, including such laws regarding the cross-border transfer of certain personal information.

**Consult with the Legal Department if you have any questions, including about how to comply with the Privacy Policies or comply with rules about transfer of personal information outside of the country in which it was collected.**

## External Communications

If you are contacted and asked to discuss Getronics business with any members of the press, investors or market analysts, do not provide any information. Instead, you should politely advise the outside party that you are not authorised to discuss the subject and refer them to the Legal Department or your line manager.

Similarly, when using personal social media, you should be clear that you do not speak on behalf of Getronics. You should always:

- **Take every possible precaution to ensure that you are not disclosing any confidential information about Getronics, it's customers, agents, contractors, subcontractors and consultants or another third party.**
- **Refrain from using any Getronics or third-party logos or trademarks without written permission from the Legal Department.**

## Intellectual Property

Getronics intellectual property is an invaluable asset that must always be protected. Intellectual property includes Getronics trademarks, brands, package designs, logos, copyrights, inventions, patents and trade secrets. You should never allow a third party to use Getronics trademarks or other intellectual property without proper authorization and a license agreement that has been approved by the Legal Department. Furthermore, Getronics trademarks should never be used in a degrading, defamatory or otherwise offensive manner.

Getronics intellectual property also includes Getronics colleagues' work products. As a Getronics colleague, any work you create, in whole or in part, in connection with your duties, and/or using Getronics time, resources or information, belongs to Getronics. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software or any other materials you may help to create or author in connection with your work for Getronics belongs to Getronics. **You should promptly disclose any invention related to Getronics, so that it may receive the same protection as other intellectual property of Getronics.**

---

***A COLLEAGUE HAS BEEN WORKING ON A NEW SOFTWARE PROGRAM DURING HIS WORK TIME USING GETRONICS' PROPRIETARY INFORMATION. HE HAS TOLD A COLLEAGUE HE IS NOW GOING TO TRY AND MARKET THE SOFTWARE HIMSELF IN HIS OWN TIME. CAN HE DO THIS?***

*NO. THE SOFTWARE IS BASED ON GETRONICS' PROPRIETARY INFORMATION AND HAS BEEN DEVELOPED IN THE COLLEAGUE'S WORK TIME. THE SOFTWARE BELONGS TO GETRONICS AND THIS SHOULD BE REPORTED.*

---

## Investigating Misconduct

All reports of suspected violations of this Code or the law will be taken seriously and promptly investigated. The investigator will:

- **Act objectively in determining facts through asking questions, interviews or a review of documents;**
- **Contact you or other Getronics colleagues who may have knowledge about the alleged incident or violation; and/or**
- **Recommend corrective actions and/or disciplinary measures where appropriate.**

In accordance with applicable law, Getronics strives to:

- **Protect the confidentiality of the individuals involved, to the extent practical;**
- **Inform a Getronics colleague of the accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation; and**
- **Where permissible, allow Getronics colleagues to review and correct information reported.**

**If asked, all Getronics colleagues must cooperate fully with an investigation.**

### **Disciplinary Action**

If you violate this Code, Getronics will take appropriate action. You are expected to follow this Code and comply with all Getronics policies and the law while conducting business on behalf of Getronics as a condition of your employment. Violating this Code, any Getronics policies or the law may result in:

- **Disciplinary action, up to and including termination of employment, depending on the nature and severity of this Code violation; and**
- **In the case of a violation of law, civil and/or criminal penalties may be imposed by a governmental agency or a court.**

### **Getronics Code is Not a Contract**

The Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period.

### **Issuance of and Amendments to this Code**

The Code is reviewed periodically by the Legal Department to determine whether revisions may be required due to changes in the law or regulations, or changes in Getronics business or its business environment. The Getronics Board of Management will approve any changes to this Code.

### **Administration of this Code**

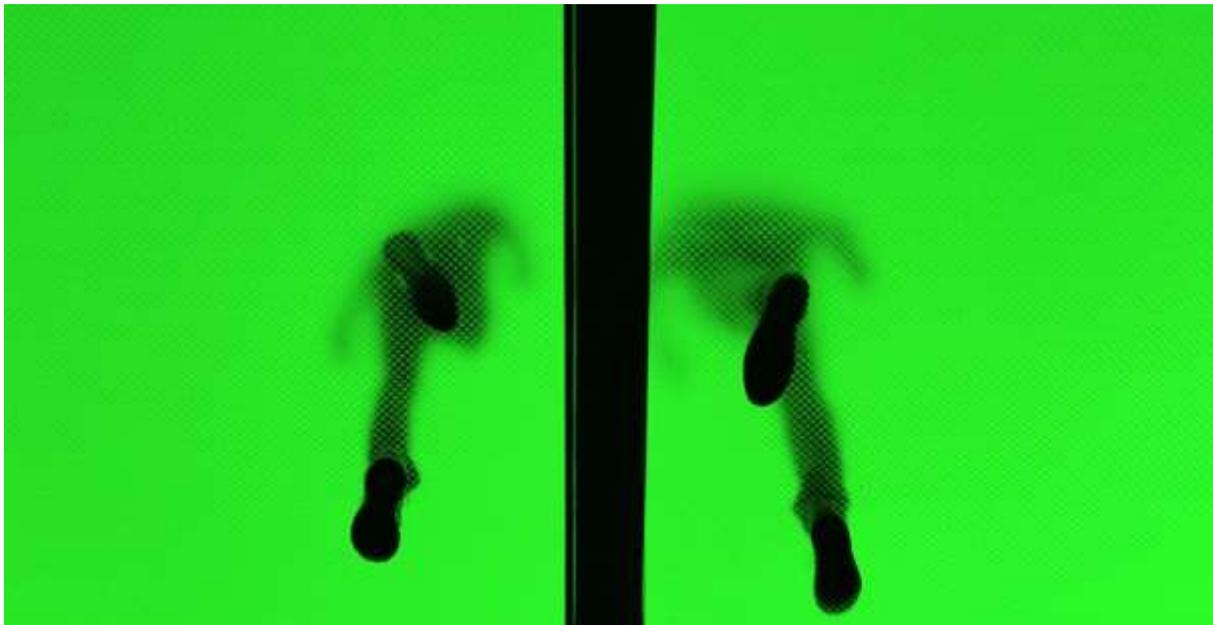
You may contact the Legal Department with questions at any time.

## Acknowledgement

The Code is always available and accessible on the Getronics internal & external website. Getronics may conduct annual online Code training for selected Getronics colleagues. Any Getronics colleagues who undertake online Code training, including the Getronics Board of Management, are required to acknowledge that they have read and understand this Code. They must also certify their compliance with this Code and disclose any potential conflict of interest or any other possible exception to compliance with this Code. Failure to complete the certification process is a Code violation and may subject you to disciplinary action and/or impact your performance reviews at Getronics' discretion, where permitted by law. In no circumstance does your failure to read this Code, sign an acknowledgement or certify online, exempt you from your obligation to comply with this Code.

## Disclosure of Waivers

Any waiver of this Code requires the prior written approval of the Getronics Group General Counsel or, in certain circumstances, the Getronics Board of Management or a committee thereof. If required by applicable law, waivers will be promptly disclosed as required by applicable law.



## ABOUT GETRONICS

Getronics is a global information and communications technology service provider with an extensive history that extends over 130 years. Our vision is to become the preferred partner in business transformation using technology and exceptional people, with a unique focus on happy clients by enabling happy colleagues. With nearly 4,000 colleagues in 22 countries across Europe, Asia Pacific, Latin America, Getronics' Transformation portfolio brings a strong capability and expertise around Managed Workspace, Applications, Industry Specific Software Solutions, Multi-Cloud Management, Unified Communications and Security Services to provide a proactive, end-to-end portfolio to enable the digital user – business or consumer, in both public and private sector. Getronics is the leading member in the Global Workspace Alliance, a unique model that provides customers with consistent IT services across 185 countries, with one single point of contact and billing entity. The GWA manages 10m workspace assets globally

