

BEYONDTRUST VENDOR CODE OF CONDUCT

1. Creating a shared value

- 1.1. BeyondTrust's Vendor Code of Conduct exists to drive mutually beneficial relationships and sustainable business models. It sets out the minimum standard of business behavior expected of our Vendors so that they act in a way that is ethical, corporately responsible, and in compliance with applicable laws and regulations.
- 1.2. BeyondTrust is committed to maintaining the highest standards of social and environmental responsibility and ethical conduct. To this end, we continue to grow our diverse Vendor base and are building relationships with Vendors and partners that reflect the market, clients and communities we serve. We seek to actively identify, develop and do business with diverse Vendors as an integral component of our strategic sourcing and procurement activity.
- 1.3. We expect our Vendors to share the principles which are expressed in this Vendor Code of Conduct and to replicate these standards further down the supply chain. We reserve the right to audit our Vendors' Vendors and/or subcontractors for compliance with this Code. Vendors shall also ensure that their personnel comply with this Code when providing goods or services to us.

2. Compliance with Laws

- 2.1. Vendors shall at all times operate in full compliance with all applicable laws, rules and regulations (collectively "Laws").
- 2.2. Wherever we work in the world we are committed to upholding the rights of all those who work for or with us, and of the communities in which we operate. We expect our Vendors to share the same commitment.

3. Labor and Human Rights

- 3.1.1. **Human rights:** Vendors must always treat their workers fairly and ethically.
- 3.1.2. **Avoidance of child labor:** We require all our Vendors to support the International Labor Organization's standards regarding child labor and minimum age. Vendors shall only employ workers who are the minimum legal age or above.
- 3.1.3. **Human Trafficking and Forced Labor:** Vendor must not use forced, involuntary or slave labor. Vendors must not engage in human trafficking. All labor must be entirely voluntary. All workers must be allowed to maintain control over their identification documentation and legal documents. Vendors must be able to certify that materials included in their products comply with applicable human trafficking and slavery laws.



- 3.1.4. **Anti-discrimination:** We want to work with Vendors who do not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, membership, genetic information, race, religion, or sexual orientation, or other status of the individual unrelated to the ability to perform the job. Vendor must not conduct medical tests on employees that can be used to discriminate (e.g., pregnancy tests) in hiring and other employment practices. We expect all our Vendors to support anti-discrimination.
- 3.1.5. **Anti-harassment and abuse:** Vendors shall commit to a workplace free of harassment and abuse. Vendors shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.
- 3.1.6. **Working hours:** Vendors shall ensure that all workers are entitled to work and be paid for a minimum level of working hours, that working hours are not excessive, and that maximum working hours comply with national laws.
- 3.1.7. **Compensation:** Vendors must comply with all applicable laws and industry standards with regards to applicable wage and labor laws. Vendors must ensure that all applicable laws and industry standards are adhered to with regards to working hours, overtime, wages, and benefits. Vendors shall pay all workers in a timely manner and communicate this accordingly.
- 3.1.8. **Freedom of Association:** Employees of the Vendor must be free and able to join a union or other employee representation group of their choice. Vendors must not interfere with this right to join, intimidate or threaten the employee. The Vendor recognizes and respects their employees' right to collective bargaining in accordance with the relevant laws in the territory.
- 3.1.9. **Incident management:** Vendors shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Vendors shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.
- 3.1.10. **Health and safety:** Vendors shall provide workers with appropriate workplace health and safety training in their primary language and shall provide a safe work environment which minimizes physical and chemical hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as ongoing safety training.
- 3.1.11. **Working conditions:** Vendors shall provide workers with accessible and clean toilet facilities and potable water. If a Vendor is providing dining, food preparation, or storage facilities, they shall be sanitary.

- 3.1.12. **Additional ergonomic support:** Vendors shall identify, evaluate, and control worker exposure to tasks that pose ergonomic risk such as excessive force, improper lifting positions, or repetitiveness.

4. **Environment**

- 4.1.1. **Carbon footprint consideration:** Vendors should recognize the importance of taking extra steps to reduce their carbon footprint. Vendors are expected to minimize and monitor their impact on the environment, where possible, through a reduction in greenhouse gas emissions, energy efficiency initiatives and through the reduction and recycling of natural resources, including water and paper. Additionally, Vendors must comply with applicable laws and regulations related to all emissions, water discharge, toxic substance and hazardous waste disposal.
- 4.1.2. **Local Vendors:** We encourage local economy growth so, where possible, Vendors should maximize the use of local labor and vendors.
- 4.1.3. **Environmental performance:** Vendors shall adhere to all relevant environmental protection laws and annually assess their environmental practices and performance.
- 4.1.4. **Waste Management:** Vendors shall implement an approach to reduce, re-use and recycle all possible waste that is sent to landfills and conduct routine monitoring of performance of its waste management process.

5. **Ethics**

- 5.1.1. **Anti-bribery and corruption:** The Vendor shall not accept or make any form of bribe, kickback or similar payment. Facilitating any such payments is also prohibited.
- 5.1.2. **Fair Business and Competition:** The Vendor will adhere to all applicable anti-trust and competition laws.
- 5.1.3. **Financial Accountability:** The Vendor shall ensure that all applicable laws and regulations designed to combat money laundering are adhered to when conducting business.
- 5.1.4. **Intellectual Property Rights and confidentiality:** Vendors must respect the intellectual property rights of others and take appropriate steps to safeguard and maintain confidential and proprietary information or trade secrets of BeyondTrust. Vendors shall only use such information for the purposes authorized by BeyondTrust.
- 5.1.5. **Data Protection:** Vendors must respect the privacy rights of others and ensure compliance with applicable data protection laws.

- 5.1.6. **Conflict of Interest:** Vendors shall ensure that their employees understand what a conflict of interest is and what actions they need to take should a conflict of interest arise.
- 5.1.7. **Business Continuity:** Vendors should be prepared for any disruption to their business and have appropriate robust policies and procedures in place to act accordingly in the event of unforeseen circumstances.
- 5.1.8. **Local community engagement:** Vendors are encouraged to nurture social and economic development and contribution to the sustainability of the communities in which they operate.
- 5.1.9. **Disclosure of Information:** Vendors shall accurately record and disclose information regarding their business activities, labor, health and safety, and environmental practices in accordance with all applicable Laws.

6. Breaches of this Code of Conduct

- 6.1. Vendors must report any known breaches of this Code of Conduct and implement a corrective action plan to cure non-compliance within a specified time period agreed with BeyondTrust in writing.

7. Contact

- 7.1. If you have any questions, please contact vendors@beyondtrust.com