
Getronics Global Code of Business Conduct

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1 Introduction

- 1.1 Within the Getronics group of companies, which includes the brands of Getronics, Connectis and Pomeroy, hereinafter referred to as ("**Getronics**"), we believe acting ethically and responsibly is not only the right thing to do, but is the right thing to do for Getronics, its Customers, its employees and the communities we serve. This Getronics Global Code of Business Conduct (the "**Code**") is Getronics guide for doing things the right way. Getronics will be, and should be, measured against the highest possible standards of ethical business conduct. Getronics reputation for acting ethically and responsibly is done one decision at a time, every day, by each one of us.
- 1.2 Within the Getronics group of companies, which includes the brands of Getronics, Connectis and Pomeroy, hereinafter referred to as ("**Getronics**"), we believe acting ethically and responsibly is not only the right thing to do, but is the right thing to do for Getronics, its Customers, its employees and the communities we serve. This Getronics Global Code of Business Conduct (the "**Code**") is Getronics guide for doing things the right way. Getronics will be, and should be, measured against the highest possible standards of ethical business conduct. Getronics reputation for acting ethically and responsibly is done one decision at a time, every day, by each one of us.
- 1.3 Each of us, especially Getronics leaders and managers, are expected to act with integrity, to lead by example, to inspire trust and to comply with this Code, and the spirit and intent of this Code. This Code applies to every Getronics employee worldwide (including officers and employees of Getronics subsidiaries, branches and affiliates), Getronics agents, contractors, subcontractors, consultants and the Getronics Board of Management. This Code governs every decision we make and actions we take.
- 1.4 As a truly global business, Getronics is committed to compliance with this Code and with the laws of the countries in which we operate. Global laws and regulations can be complex, however, with every Getronics employee, agent, contractor, subcontractor, consultant and the Getronics Board of Management following this Code this will go a significant way to helping Getronics comply with these Global laws and regulations.

If any Getronics employee has any questions regarding this Code, they should address them with their line manager, to Human Resources, or the Legal Department.

- 1.5 Albeit the Legal Department is accountable for promoting, monitoring and enforcing this Code, Getronics holds each of its employees individually responsible for following this Code and for continuing Getronics culture of ethical excellence around the world. Please read this Code, and follow it, both in spirit and letter, always bearing in mind that each of us has a personal responsibility to incorporate, and to encourage others to incorporate, the principles of this Code into our work.
- 1.6 If any Getronics employee has a question regarding this Code or believes another Getronics employees or Getronics itself is falling short of Getronics commitment to this Code, please don't be silent and raise it with you line manager to Human Resources or the Legal Department. We want – and need – to hear from you.

2 Who Must Follow this Code?

Getronics expects all its employees, agents, contractor and subcontractors and the Getronics Board of Management to know and to adhere to this Code. Failure of a Getronics employee to adhere to this Code may result in disciplinary action, including termination of employment. Moreover, while this Code is written for Getronics employees and the Getronics Board of Management, Getronics mandates that any agent, contractor, subcontractor or consultants (whether temporary or permanent), which is performing work or services for or on behalf of Getronics will also adhere to this Code and failure to do so will result in Getronics terminating its relationship with them.

3 What If I Have a Code-Related Question or Concern?

3.1 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 this Code, or if you have questions on how to interpret this Code, seek guidance. Likewise, if you are aware of something that may be a violation of Getronics core values, this Code, Getronics policies or the law, you must speak up and report it so it can be addressed. If you have a question or concern, don't just sit there. You can contact your line manager, Human Resources, or the Legal Department.

3.2 Some examples of issues or concerns include:

- a) Accounting or auditing irregularities or misrepresentations;
- b) Fraud, theft, bribery or other corrupt business practices;
- c) Human Rights violations;
- d) Illegal discrimination or harassment; and/or
- e) Actual or potential conflicts of interest.

3.3 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. Your identity, phone number or IP address will not be recorded or included in any report that is provided to Getronics, unless you voluntarily provide such information. What matters is what is being reported, not who reports it.

4 No Retaliation

Getronics prohibits retaliation against any Getronics employee who reports what he or she believes is a violation of this Code, or law, raises a compliance question or seeks advice regarding a business practice, decision or action, or participates in an investigation of a possible violation of this Code, policies, or the law. Retaliation against someone reporting an issue in good faith is itself a violation of this Code. If you believe you are being retaliated against, you should report it to your line manager or the Legal Department.

5 Respect

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

6 Diversity and Inclusion

- 6.1 At Getronics, we define "**diversity**" as all the unique characteristics that make up each of us: personalities, lifestyles, thought processes, work experiences, ethnicity, race, color, religion, gender, gender identity, sexual orientation, marital status, age, national origin, disability, veteran status, or other differences.
- 6.2 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.
- 6.3 All Getronics employees play an important role in creating a work environment in which Getronics employees, agents, contractors, subcontractors and consultants feel valued and respected for their contributions. You promote diversity and inclusion when you:
- a) Respect the diversity of each other's talents, abilities and experiences;
 - b) Value the input of others; and/or
 - c) Foster an atmosphere of trust, openness and candor.
- 6.4 We will better understand the needs of Getronics customers, agents, contractors, subcontractors, consultants and the marketplace and foster innovation if each of us embraces diversity and inclusion in all aspects of the Getronics business.

7 Human Rights

- 7.1 Getronics recognizes the importance of maintaining and promoting fundamental human rights in Getronics operations and supply chain, and Getronics are committed to respecting the rights of workers throughout our value chain. Getronics support the principles contained in the United Nation's International Bill of Human Rights and the International Labor Organization Fundamental Principles and Labor Standards. Getronics operates under programs and policies that:
- a) Promote a workplace free of discrimination and harassment;
 - b) Prohibit child labor, forced labor and human trafficking;
 - c) Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws;
 - d) Provide humane and safe working conditions, including safe housing conditions, where applicable; and/or
 - e) Recognize employees' right to freedom of association and collective bargaining.
- 7.2 Getronics expects its agents, contractors, subcontractor and consultants to uphold these principles as well. Getronics Supplier Code of Conduct is a tool Getronics uses to communicate Getronics expectations and to minimize the risk of human rights abuses throughout the Getronics supply chain.
- 7.3 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 abuse within Getronics operations or supply chain, speak up and report it to your line manager, Human Resources or the Legal Department.

8 Anti-Discrimination

- 8.1 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 employees 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:
- a) Race, color, ethnicity, or national origin;
 - b) Gender or gender identity;
 - c) Sexual orientation;
 - d) Age;
 - e) Religion;
 - f) Disability;
 - g) Veteran status; and/or
 - h) Any other legally protected status.
- 8.2 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.

9 Anti-Harassment

- 9.1 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, and this Code prohibits harassment in the workplace.
- 9.2 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 behavior:
- a) Sexual harassment;
 - b) Offensive language or jokes;
 - c) Racial, ethnic, gender or religious slurs;
 - d) Degrading comments;
 - e) Intimidating or threatening behavior; and/or
 - f) Showing hostility towards others because of individual characteristics.
- 9.3 You should never act in a harassing manner or otherwise cause your co-workers to feel uncomfortable in their work environment. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.
- 9.4 If you or someone else is the subject of discrimination or harassment, speak up and report it to your line manager, Human Resources or the Legal Department.

10 Health and Safety

- 10.1 We are committed to safeguarding the health and safety of Getronics employees, visitors, agents, contractors, subcontractor, consultants, customers and communities. Our health and safety policies and procedures are designed to help you to work safely, whether at our facilities, in the marketplace or on the roadways.
- 10.2 You should always speak up and raise a concern if you:
- a) Are asked to do a task you consider unsafe;
 - b) Are asked to do a job you think you are not properly trained to perform and that may harm you or others;
 - c) See someone performing a task that you think is unsafe or that the person is not properly trained to do;
 - d) Suspect that a vehicle or piece of equipment is not operating properly and may be unsafe; and/or
 - e) Observe or are made aware of an unsafe condition or a potential danger to yourself or others.
- 10.3 Safety is everyone's responsibility – you must insist that work be performed safely, no matter your role or your position in Getronics.

11 Substance Abuse

- 11.1 If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. Drugs may include illegal drugs, controlled substances or misused prescription medication. You are expected to perform your job duties free from the influence of any substance that could impair job performance. Getronics prohibits any person:
- a) Working under the influence of alcohol, illegal drugs or controlled substances on or off Getronics premises;
 - b) Possessing, selling, using, transferring, or distributing illegal drugs or controlled substances while working or on the premises; and/or
 - c) Working while impaired by a lawful prescription medication or over-the-counter drug.
- 11.2 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.

12 Anti-Violence

- 12.1 Getronics has a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or hazing.
- 12.2 Getronics also prohibits the possession of weapons in the workplace. To the full extent permitted by local law, this prohibition extends to Getronics carparks as well as Getronics facilities. Getronics zero-tolerance policy for workplace violence applies to behavior on Getronics premises, as well as to the behavior of Getronics employees engaged in Getronics business anywhere in the world

outside of Getronics premises.

Don't delay – speak up and report threats or potential violence immediately to your line manager, Human Resources or the Legal Department.

13 Integrity

We should treat all those in the marketplace with whom we encounter with fairness and integrity. This includes Getronics customers who purchase Getronics products and services, the communities we serve, as well as Getronics competitors, agents, contractors, subcontractors and consultants. Underlying this commitment to integrity is Getronics obligation to comply with all applicable laws wherever we do business.

14 Responsible Marketing

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

- a) Overstate or misrepresent the qualities of Getronics products or services;
- b) Use misleading or untruthful statements in Getronics advertising or marketing; and/or
- c) Make claims about Getronics products or services without adequate substantiation and proper legal clearance.

15 Getronics Customers

15.1 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:

- a) Earn their business based on Getronics superior products, customer service and competitive prices;
- b) Present Getronics services and products in an honest and forthright manner;
- c) Avoid unfair or deceptive trade practices;
- d) Communicate Getronics sales programs clearly; and/or
- e) Deliver on your promises.

15.2 Getronics contracts with its customers must always reflect the importance and value we place on their business. All customer sales and supplier agreements should be in writing and conform to Getronics policies.

If you have questions on Getronics contracting policies, please contact the Legal Department.

16 Getronics Agents, Contractors, Subcontractors and Consultants

16.1 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 a 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 Getronics Supplier Code of Conduct as a condition of doing business with Getronics.

- 16.2 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.

17 Getronics Competitors

- 17.1 Getronics is committed to outperforming Getronics competitors legally and ethically within the framework of a free enterprise system. Therefore, you should:

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

- 17.2 When dealing with Getronics competitors, 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 trade show or customer event.

- 17.3 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 behavior.

- 17.4 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 consult the Legal Department. If you suspect an antitrust violation, speak up and report it.

18 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 with government officials.

19 Conflicts of Interest

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

- a) Engage in activities that compete with, or appear to compete with, Getronics' interests;
- b) Let your business decisions be influenced, or appear to be influenced, by personal or family

- interests or friendships;
 - c) Use Getronics property, information or resources for personal benefit or the benefit of others;
 - d) Hire, supervise or have a direct or indirect line of reporting to a family member or someone with whom you have a romantic relationship;
 - e) Have outside employment that negatively affects your job performance or interferes with your responsibilities to Getronics; and/or
 - f) Work for, provide services to, 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 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.
- 19.2 You must disclose potential conflicts of interest to Getronics. Remember, having a conflict of interest is not necessarily a violation of this Code, but failing to disclose that conflict is.
- 19.3 If at any time in your employment you think that you may have a potential or actual conflict of interest, you have an obligation to disclose the conflict promptly to Getronics so that a determination can be made as to the existence and seriousness of an actual conflict. 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 recusal from certain business decisions.
- 19.4 If you are subject to Getronics annual online Code training, you must also disclose your potential conflict of interest at the end of the training course when prompted to do so. You should continue to disclose such circumstances each year as part of your annual Code training if the potential conflict is ongoing.

20 Anti-Corruption

- 20.1 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:
- a) Bribery (governmental or commercial);
 - b) Extortion; and/or
 - c) Kickbacks.
- 20.2 Corrupt activities are not only a Code violation, they can also be a serious violation of criminal and civil anti-bribery and anticorruption laws in various countries. Should you become aware of any potential or actual corrupt arrangement or agreement, speak up and report it either to the Legal Department.

21 Anti-Bribery

- 21.1 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 employees regardless of personal location or place of business must comply with the U.S. Foreign Corrupt Practices Act ("**FCPA**"). The FCPA makes bribery of government officials a crime and applies wherever Getronics conducts business.
- 21.2 To comply with anti-bribery laws, no employee should ever offer, directly or indirectly, anything of value, including a gift or entertainment, to any government official or his or her representatives to:
- a) Obtain or retain business;
 - b) Influence business decisions; and/or
 - c) Secure an unfair business advantage.
- 21.3 These prohibitions apply to Getronics business operations and to anyone acting on Getronics behalf, including agents, contractors, subcontractors and consultants.
- 21.4 Note that a government official may be interpreted broadly to include numerous people in numerous roles. Please consult the Legal Department for examples.
- 21.5 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 policy 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, directly to the Legal Department.
- 21.6 All payments, both direct and indirect, made to government officials must be accurately recorded in Getronics 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 contact the Legal Department for guidance. Always speak up and report any suspected bribery activity.

22 Anti-Money Laundering

- 22.1 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.
- 22.2 You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. 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 to the Legal Department.

23 International Trade Controls

- 23.1 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:
- a) Government imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts;
 - b) 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; and/or
 - c) Sanctions by different governments around the world that restrict activities with certain countries, entities, or individuals.
- 23.2 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 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.

24 Political Activities

- 24.1 Getronics encourages its associates to participate in their communities, which may include political activities. However, you may not use Getronics funds or resources, or receive Getronics reimbursement, for personal political activities, including contributions to political candidates or parties. You should avoid even the appearance of doing so.
- 24.2 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.
- 24.3 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.

25 Business Gifts

- 25.1 The practice of giving business gifts to Getronics customer's 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 exchanged, you should determine if it is permitted under this Code and Getronics policies, including applicable sector or function policies.
- 25.2 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:
- a) The gift is given in good faith, without expecting any return favor or improper benefit or business advantage, is of nominal value (generally under \$25 USD or its local equivalent), is provided openly and transparently, is given on behalf of Getronics and not on behalf of any individual, is reasonable and customary, is given infrequently, and does not otherwise create the appearance of impropriety;
 - b) 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;
 - c) Your division or function does not have a **"no gifts"** policy in effect; and/or
 - d) 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.
- 25.3 **"Business gifts"** do not include Getronics sponsored sales contests or incentive programs. 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.
- 25.4 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.

26 Financial Integrity and Responsibility

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

27 Signing a Contract

- 27.1 Each time you enter into a business transaction on Getronics' behalf, there should be documentation recording that agreement, approved by the Legal Department. Signing a contract or any document (which includes accepting online terms and conditions) on behalf of Getronics is a very big deal. Never sign a contract, sign a document, or accept online terms and conditions on behalf of Getronics unless all the following are met:

- a) You are authorized to do so. If you are unsure whether you are authorized, ask your line manager, the Legal Department or the VMO;
- b) The contract has been approved by the Legal Department;
- c) You have studied the contract, understood all its terms and decided that entering into the contract is in Getronics' interest; and/or
- d) All contracts at Getronics should be in writing and should contain all the relevant terms to which the parties are agreeing – Getronics does not permit “**side agreements**” whether oral or written.

28 Accurate Business Records

- 28.1 Getronics' focus on speaking with truth and candor underscores Getronics commitment to accuracy in Getronics books and records. Business records, including Getronics financial statements, 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 the financial transactions and events. Likewise, all your transactions, no matter what the dollar amount, must be properly authorized, executed and recorded.
- 28.2 In addition, anything provided to a government official must be properly and accurately recorded in Getronics' business records.
- 28.3 You are accountable for the accuracy of the business records that you handle in the normal course of business. You should never:
- a) Falsify, omit, misstate, alter or conceal any information or otherwise misrepresent the facts on a Getronics record; and/or
 - b) Encourage or allow anyone else to compromise the accuracy and integrity of Getronics records.

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

29 Public Disclosures

- 29.1 The disclosures Getronics makes in any public communication, regulatory disclosure and report submitted to any governmental agency must always be full, fair, accurate, timely and understandable.
- 29.2 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

30 Records Management

A company 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.

31 Audits and Investigations

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

32 Getronics Resources

- 32.1 Getronics relies on you 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 use Getronics resources only for legitimate business purposes and protect them from theft, loss, damage, or misuse.
- 32.2 The obligation to protect Getronics funds is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts. You must always:
 - a) Ensure the funds are properly used for their established purpose;
 - b) Obtain required approval before incurring an expense;
 - c) Accurately record all expenditures; and/or
 - d) 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, please speak up and report it.

33 Fraud

33.1 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:

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

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

34 Confidential Information

34.1 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.

34.2 Always take reasonable and necessary precautions to protect any confidential information relating to Getronics its 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:

- a) Properly authorized;
- b) In connection with a clearly defined, legitimate business need; and/or
- c) Subject to a written confidentiality agreement approved by the Legal Department.

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

34.4 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.

35 Privacy

35.1 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:

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

35.2 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.

36 External Communications

36.1 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 authorized to discuss the subject and refer them to the Legal Department or your office lead for your section, region or country.

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

- a) Take every possible precaution to ensure that you are not disclosing any confidential information about Getronics its customers, agents, contractors, subcontractors and consultants or another third party; and/or
- b) Refrain from using any Getronics or third-party logos or trademarks without written permission.

37 Intellectual Property

37.1 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.

- 37.2 Getronics intellectual property also includes Getronics employees' work products. As a Getronics employee, 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.

38 Getronics Email, Internet and Information Systems

- 38.1 You must use Getronics email and all internet-based applications and accounts responsibly and protect the security of Getronics information systems. Getronics information technology systems constitute a critical component of Getronics business operation and are provided for authorized business purposes only. Your use of Getronics systems 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 phone, email and the internet if such usage does not:

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

- 38.2 While it is generally not Getronics practice to monitor its employees 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 employee's activity using Getronics email, phone, voicemail, internet and other Getronics systems, to the extent permitted by local law.

39 Investigating Misconduct

- 39.1 All reports of suspected violations of this Code or the law will be taken seriously and promptly reviewed. As appropriate, the Legal Department will assign investigator(s) to review all reported instances of alleged Code violations. The investigator(s) will:

- a) Act objectively in determining facts through interviews or a review of documents;
- b) Contact Getronics employees who may have knowledge about the alleged incident(s); and/or
- c) Recommend corrective actions and/or disciplinary measures where appropriate.

- 39.2 In accordance with applicable law, Getronics strives to:

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

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

40 Disciplinary Actions

40.1 If you violate this Code, Getronics may take appropriate disciplinary 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:

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

41 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.

42 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 Directors will approve any changes to this Code.

43 Administration of this Code

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

44 Acknowledgement

The Code is always available and accessible on the Getronics internal website. Each year, Getronics may conduct annual online Code training for selected Getronics employees. Any Getronics employees who undertake online Code training, including the Getronics Board of Directors 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.

45 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 Directors or a committee thereof. If required by applicable law, waivers will be promptly disclosed as required by applicable law.