



VENDOR CODE OF CONDUCT

Symphony Communication Services, LLC, along with its affiliates, (together, “Symphony” or the “Company”) holds our business practices against the highest standards for ethical business conduct. We believe that responsible business practices are not only the right thing to do for sustainability purposes, but also an expectation for a business that proudly serves as the leading markets infrastructure and technology platform to regulated financial institutions worldwide.

In furtherance of that view, Symphony participates in the United Nations Global Compact, a voluntary leadership program for the implementation of responsible business practices. Symphony has signed a commitment to follow the [Ten Principles](#) of the United Nations Global Compact, agreeing to meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption, and to impart those principles and values in our strategies, policies, and procedures, and to foster a culture of integrity.

The Vendor Code of Conduct (the “Code”) is one of the ways we put those principles into practice. We expect all our vendors, consultants, service providers, contractors, and anyone else temporarily assigned to perform work for Symphony (each, a “Vendor”) to follow the Code in connection with their work for us. Failure of a Vendor to follow the Code can result in termination of their relationship with Symphony.

Below are the key principles in the Code:

Oppose slavery in all its forms and respect human rights

Symphony believes that human rights are universal and fundamental rights that preserve the inherent freedom, dignity, and equality of all human beings. Our approach to human rights is informed by the International Bill of Human Rights, International Labor Organisation Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

Symphony requires that our Vendors:

- Ensure there is no forced, bonded or indentured labor in its business operations and supply chain.
- Not impose any unreasonable restriction on workers’ freedom of movement in the work facility, nor any unreasonable restrictions on entering or exiting company-provided facilities, including, if applicable, worker’s dormitories.

- Provide workers with a written employment agreement in their native language that describes the terms and conditions of employment.
- Comply with local laws regarding the minimum hiring age for workers; provided, however, that in no case may Vendor hire or use the services of a worker younger than 15 years of age.
- Manage worker hours so as not to exceed the maximum set by local law. Further, all overtime must be voluntary, and workers shall not be denied work breaks and the holiday, vacation, and sick days which they are legally entitled.
- Ensure that compensation paid to workers complies with all applicable wage and hour laws, including those relating to minimum wages, overtime hours, and other legally mandated benefits.
- Respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.
- Regularly assess and address any actual or perceived human rights risks in their operations and supply chain.

Adhere to all work health and safety laws

Symphony is committed to ensuring the health and safety of our employees, customers, contractors, visitors, and Vendors.

Symphony requires that our Vendors:

- Comply with all legal responsibilities of an employer under applicable legislation of the country in which they operate.
- Provide a safe and hygienic working environment through proactive management and controls that minimize health and safety risks, support accident prevention, and provide workers with adequate training on how to perform their jobs safely.

Create a workplace free of violence, harassment, and discrimination

Symphony believes that we all deserve to work in an environment where we are treated with dignity and respect. Symphony is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. Symphony is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive, or harassing behavior.

Symphony requires that our Vendors:

- Have in place equal employment opportunity, anti-discrimination and anti-harassment policies covering your operations and supply chain which meet or exceed requirements of any relevant laws.
- Ensure workforce processes, practices, and decisions are fair and merit-based, in particular with regard to recruitment, promotion, evaluation of performance, and remuneration.
- Comply with all applicable laws concerning pay equity and should seek to ensure that employees of different genders are paid the same for similar responsibilities.
- Commit to a workplace that is free of any form of harassment—i.e., unwelcome verbal, non-verbal, or physical conduct directed against any person or group.
- Maintain a productive work environment free of violence, sexual abuse, corporeal punishment, mental or physical abuse, bullying, public shaming, verbal abuse of workers, nor is there to be the threat of any such treatment.

Demonstrate responsibility to the environment

Symphony is proactive in reducing its environmental footprint and playing its part in limiting climate change. Symphony aims to procure goods and services that have the least possible negative environmental impact.

Symphony requires that our Vendors:

- Meet all relevant local and national environmental protection laws as well as strive to comply with any relevant international or industry-wide environmental protection standards.
- Assess and manage the environmental impact across their operations, transport, and supply chain and take responsibility for minimizing the negative impact of their goods and services throughout their lifecycle.
- Minimize pollution, use of toxic chemicals, and promote the efficient and sustainable use of resources.
- Minimize greenhouse gas emissions.

Comply with all applicable laws, including those prohibiting corruption

Symphony's commitment to integrity begins with complying with the laws, rules and regulations in the places where we do business. Symphony expects its Vendors to

conduct business in accordance with the letter, spirit, and intent of all applicable laws and to refrain from any illegal, dishonest, or unethical conduct.

Symphony requires that our Vendors:

- Comply with all relevant laws, regulations, and applicable industry standards or codes of conduct regarding all goods and services provided to Symphony.
- Ensure zero tolerance and implement procedures to mitigate corruption in any form, including bribery, extortion, kickbacks, facilitation payments, and improper conveyance of benefits of any kind to customers, agents, contractors, suppliers or employees of any such party or government officials.
- Avoid any actions that create a perception that favorable treatment of outside entities by Symphony was sought, received or given in exchange for personal business courtesies.
- Not give or accept business courtesies (including gifts, gratuities, meals, refreshments, or entertainment) that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Symphony or its customers, or would cause embarrassment or reflect negatively on Symphony's reputation.
- Maintain appropriate procedures and processes designed to achieve compliance with sanctions administered or enforced by the U.S. Department of Treasury's Office of Foreign Assets Control, Her Majesty's Treasury, the United Nations Security Council, or any other relevant sanctions authority.
- Conduct appropriate due diligence to ensure that neither it nor any of its affiliates, directors, officers, employees, or agents is an individual or entity that is, or is owned or controlled by, a person subject to sanctions.
- Not engage in, or be a party to, any transaction or activity with a person or entity designated by a relevant sanctions authority.
- Implement procedures to ensure that its business and services may not be used to conceal or obfuscate the source or beneficiary of money, funds, or assets of any kind, or to otherwise potentially further money laundering or terrorist financing.
- Proactively bring to Symphony's attention where Vendor has, or reasonably suspects that it might have, breached of any of the above requirements.

Safeguard the confidentiality of Symphony and client information

Integral to Symphony's business success is the protection of confidential company information, as well as the information entrusted to us by our employees, customers, and other business partners. "Confidential Information" means all information, whether oral, written or otherwise, belonging to or concerning Symphony, its affiliates, or its clients, customers, or partners, including, without limitation: strategic, marketing, and business plans; research and development projects; financial information; client lists; trade secrets or concepts; software, tools, questionnaires and assessments, technical data, or performance information; contractual information, marketing information, industry information, client-related information of all kinds; and all other non-public aspects of Symphony's business which Vendor otherwise obtains by virtue of the engagement.

Vendor may also obtain, review, or otherwise process "Personal Data"—information that relates to an identifiable individual (such as names, address, contact information). Personal Data should also be treated as any other Confidential Information.

Symphony requires that our Vendors:

- Safeguard all information received or accessed by Vendor by virtue of its engagement as Confidential Information.
- Refrain from disclosing Confidential Information to any third party without a valid purpose and prior written authorization from the appropriate Symphony engagement lead.
- Process any Personal Data only according to the express instructions provided by Symphony and not for any other purpose, in each case pursuant to a written services agreement (and any written supplements to it) in place between Vendor and Symphony.
- Comply with Symphony's [Privacy Policy](#) as if Vendor were Symphony thereunder.

Respect for Symphony assets and securing against outside threats

To enable Vendor to fulfill its obligations under the service agreement, Symphony may provide the Vendor with a computing device (e.g., a laptop, cellphone, tablet) and/or access to any of Symphony's systems (e.g., instances of the Symphony platform controlled by Symphony or its customers, Symphony networks, or other proprietary software or systems),

Symphony requires that our Vendors:

- Follow Symphony's Information Security Policy and any other security directives that we provide from time to time.
- Employ common security measures to ensure the protection of assigned Symphony assets (e.g., use of individual computer passwords, cable locks, and other security devices).
- Refrain from using Symphony systems or devices to transmit, retrieve, or store materials and/or communications of a defamatory, discriminatory, harassing, or sexually explicit nature, to engage in illegal or unauthorized activities, or to conduct any activity contrary to Symphony's best interests.
- Immediately report to Symphony's IT Department at it_helpdesk@symphony.com any loss or theft of Symphony computing device, and if Vendor becomes aware of any information suggesting that the security of any logins or the security procedures have been compromised in any way.

Raising a Concern

Symphony believes it is important to encourage our employees, customers, and Vendors to speak up and expose any potential wrongdoing and unethical behavior allegedly committed by or on behalf of our Company. This allows Symphony to prevent the wrongdoing from escalating, promptly rectify any conduct issues, minimize corporate losses, and limit reputational harm.

To that end Symphony has instituted an internal grievance mechanism or whistleblower process that is clearly communicated and understood by employees and Vendors, protecting whistleblowers and prohibiting retaliation.

To the extent you have identified an actual or suspected breach of this Code, Vendor should immediately notify Symphony by any of the methods listed below:

- Vendors can email Symphony's Legal Department, legal@symphony.com.