

# UNIT4

In Business for People

## Code of Ethics and Business Conduct

Version: 2.0

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Proprietary



## About this Code

Unit4 Code of Ethics and Business Conduct sets the basic principles, to guide the motives and actions of all employees, contractors, directors, and officers of Unit4 Group Holding B.V. and its subsidiaries.

The Code seeks to deter wrongdoing and to promote:

- Fair labour and employment practices;
- Ethical personal conduct;
- Fair and ethical business practices;
- Adequate use of company assets and information; and
- Legal compliance.

All Staff in the course of their work for Unit4 or related to it must always conduct themselves in accordance with the basic values and principles set out in this Code and avoid any improper conduct. Staff means all employees, contractors, directors, and officers of Unit4 Group Holding B.V. and its subsidiaries.

Our business partners and suppliers are also expected to operate in accordance with our values and principles, pursuant to the Unit4 Business Partner Code of Conduct available at [Terms & Conditions | Unit4](#).

This Code and the Partner Code (as applicable) supersede all other codes of conduct, policies, procedures, rules, general business principles or any other similar written document, to the extent that they conflict with this Code or the Partner Code (as applicable). This Code, the Partner Code and any other internal policies and procedures may be reviewed and updated from time to time. If a law conflicts with a policy in this Code or this Code, our Staff must comply with the law.

The Global Leadership Team has overall responsibility for ensuring the Code complies with our legal and ethical obligations and that all Staff comply with it. The Chief People Experience Officer and General Counsel have the primary and day-to-day responsibility for implementing this Code, training Staff on it and monitoring its use. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Code and participate in any required training.

## A message from Simon Paris

### Chief Executive Officer

Our vision is to empower businesses and people to focus on what really matters – and how we do that counts. We aren't just talking about end results; we are talking about our journey. The way we conduct ourselves as a business and as people. Doing the right thing – for our communities, our customers, our colleagues, and Unit4.

We have a clear idea of our culture and values, and we all play a part in keeping us on track. We prioritize people, both our colleagues and our customers, along with equity and inclusion, balance and wellbeing, empowerment and autonomy. Our values – people first, choose curiosity, make an impact, and be genuine – act as guiding principles we should all follow. Because how we act matters, it defines who we are and how we are perceived.

Our Code of Ethics and Business Conduct (the Code) further layouts out our expectations, both of the business and of our people. It establishes the internal and external conduct promised and expected. It applies to everyone, even if not every situation applies directly to your role, and we must all take time to understand it.

Protecting who we are at Unit4 requires all our people. We must all adhere to the Code, we must remain vigilant, ask questions, and speak up.

Our people are Unit4's greatest asset, I know we can count on you.

*“Protecting who we are at Unit4 requires all our people.”*

## A message from Michelle Eisenberg

### General Counsel

At Unit4, we are on a mission to develop innovative technology that will give people the means to focus on what matters to them and their business. People are at the heart of our organization, and as hard as we work to make an impact, we must never compromise on our values and ethics. Our Code is more than a set of rules; it establishes our tone of ethics and compliance and serves as a guiding post. Please take the time to read and understand it, as we expect everyone to do the right thing and always maintain the highest level of integrity.

The Code will not cover every situation. If you are unsure, there are many resources available to you at Unit4, including the People Experience and Legal teams, who are there to support and answer your questions. There are also safe and secure routes to report a concern. We do not tolerate retaliation of any kind against those who raise concerns. We encourage you to be on the lookout for compliance risks and thank you for speaking up.

*“As hard as we work to make an impact, we must never compromise on our values and ethics.”*

# Our Values

## The four values that unite Unit4:

- **People first** – We put people first and everything else follows. This value represents our true, core people focus internally and externally.
- **Choose curiosity, embrace challenges** – We are an innovative company driven by curiosity to always do better. We love taking on challenges and finding solutions.
- **Make an impact, be proud** – We all go to work wanting to make an impact, regardless of what we do, this is what connects us. And we should be proud of all the great things we accomplish.
- **Be true to yourself** – We are an inclusive company, encouraging people to be genuine. We see value in diversity and staying true to ourselves.

Our core values are the framework for our business and are reflected in the principles set out in this Code.

# Core Principles

## Honest and Ethical Business Conduct

Being an ethical company is not only core to our values, it is also crucial to our continued success. Unit4's policy is to comply with all applicable laws and regulations of the countries in which we operate and to conduct our business activities in an honest, ethical, and responsible manner. We value fairness, integrity and respecting each other. Together, we have a responsibility to understand - and follow - legal and internal policy requirements that apply to each of our job roles.

## Appreciating Diversity, Equity, and Inclusion

With 'be genuine' as one of our values, we place great emphasis on diversity. Through our Diversity4U program. We help our employees to become more aware of bias and further grow our inclusive culture. We also celebrate our differences and the value that a diverse workforce can bring by recognizing those who live and breathe our values every quarter. As a company which conducts business across the globe, we each need to recognize that conduct that is socially and professionally acceptable in one country or region may be viewed differently in another.

## Relationship with Stakeholders

It is a core responsibility of Unit4 and its people to add value – we pursue innovation, operate with sound business practices, and contribute to developing a sustainable society. We all consider the impact of our business activities in the interest of our stakeholders, customers, employees, and business partners.

## 1. Fair Labor and Employment Practices

### 1.1. Labor and Human rights

Unit4 respects the human rights of all individuals and groups that may be affected by our operations. This includes Staff, customers, and suppliers. Our commitment to respect human rights is guided by internationally recognized human rights and labour standards, which, at a minimum, are those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We also comply with all applicable anti-slavery and human trafficking laws, regulations, and codes from time to time in force and do not engage or employ children.

Unit4 is committed to ensuring that there are no human rights violations, modern slavery or child labour taking place in any part of our business.

### 1.2. Fair Employment practices

#### Fair Career Advancement & Talent Development

Unit4 aims to ensure that all recruitment and selection processes and actions taken are effective, consistent, fair and comply with all current applicable employment legislation. None of our Staff or potential employee or contractor shall receive less favourable treatment or consideration during recruitment and selection on the grounds of, colour, religion or belief, nationality, ethnic origin, sexual orientation, gender, age, disability, or marital status.

The Talent Development team is here to support the achievement of Unit4's strategic goals by ensuring that people across Unit4 are equipped with the necessary skills, knowledge, and behaviours to succeed in their roles, deliver the strategy, and develop their careers.

#### Fair Compensation and benefits

Unit4 compensates all its Staff with legally compliant minimum wage or above. Our Benefits team regularly benchmarks the market to ensure our Staff are remunerated in line with industry norms. Unit4 remains competitive in each of our operating countries by closely monitoring

market conditions and trends and responding to these wherever possible. Additionally, Unit4 actively works through different initiatives and routes to further close the gender pay gap.

Keeping our Unit 4 values in mind, our wellbeing approach is designed to support and promote the wellbeing of all our Staff. We work to ensure that our benefits are diverse, inclusive, fair, and accessible, while also remaining relevant locally. The range and level of benefits offered to Staff are designed to be the best fit for the relevant market and country conditions.

#### Fair Dismissal

Unit 4 is committed to maintaining a fair and inclusive workplace environment that values and respects all Staff. We ensure that any dismissals are conducted fairly and in accordance with applicable laws and regulations.

#### Parental Leave

Unit4 recognizes the significance of parental leave and is committed to supporting the well-being of our Staff and their families. Our parental leave complies with local legislation.

#### Work environment and Work/Life balance

Unit4 strives to create a positive working environment that promotes the well-being and satisfaction of our Staff. We value open communication and collaboration, ensuring that all members of our business are heard and respected. Regular open dialogue allows us to continuously grow and improve as a business. Unit4's philosophy is that Work/Life balance is personal to the individual. We therefore aim to empower our Staff to implement his/her own wellbeing by electing the benefits that work best for them. Fusion is the evolution as we deliver increased opportunities for hybrid working. *Fusion* will play a pivotal role in influencing our workforce and workplace planning making Unit4 an employer of choice for hybrid workers seeking the freedom of choice to find the perfect Fusion of work-life balance.

Unit4 maintains a Work/Life Balance Policy based on trust in our Staff to deliver results and take care of their own wellbeing.

Unit4 collaborates with the Works Councils and complies with its legal obligations that apply to the Works Councils.

### 1. 3. Equal Employment Opportunities

#### Diversity, Equality, and Inclusion

Unit4 is fully committed to promoting and implementing equal opportunities for all Staff. DE&I (Diversity, Equality, and Inclusion) is an essential part of Unit4's culture and strategy and our everyday work – it guarantees that all our Staff are engaged and valued. It also and reinforces our ability to build technology that works for all of our customers.

Unit4's DE&I commitment highlights our approach throughout the whole employee experience with three focus areas, detailing key outcomes and targets that we all contribute to:

- Attract, hire, and grow exceptional talent with diverse perspectives.
- Build an inclusive and supportive environment for everyone.
- Be a driving force for change in the tech industry.

### Anti-Discrimination and Sexual Harassment

Unit4 is an equal opportunities employer, and everyone will be provided with equal opportunities in employment and occupation regardless of race, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status or disability.

We abide by all applicable laws & regulations that govern the rights of Staff at work and no form of harassment or discrimination will be tolerated, including but not limited to name calling, exclusion, sexual harassment, inappropriate or offensive physical contact or bullying. These standards apply no matter where our Staff are conducting Unit4 business, including while working on our premises, at offsite locations, at Unit4 sponsored business and social events, or at any other place where a Staff member is acting as a representative of Unit4.

### Health and Safety

At Unit4, our commitment to the well-being of our Staff, visitors, and the surrounding environment is paramount. We comply with all applicable health and safety laws where we operate and recognize the importance of maintaining a safe, healthy, and sanitary workplace to ensure the highest standards of productivity and morale.

This commitment extends to our remote Staff, recognizing that their well-being is essential to the overall success and productivity of our organization. As hybrid working becomes an integral part of our operational structure, we are dedicated to ensuring that our Staff experience a safe and healthy work environment, regardless of their physical location. Our primary objectives are to prevent accidents, injuries, and illnesses, and to create a safe and healthy working environment.

### Freedom of Association and Collective Bargaining

Unit4 recognizes and respects the freedom of Staff to choose whether to establish or to associate with any organization. Unit4 respects, within the framework of local law, regulations and prevailing labour relations and employment practices, the right of its Staff to be represented by labour or trade unions.

## 2. Ethical Personal Conduct

### 2.1. Personal conduct and Integrity

Our Staff represents Unit4 and, in turn, our reputation. Accordingly, we expect you to conduct yourself with integrity and in an ethical manner in all business settings, including when attending events (as a sponsor, partner or employee) or offering or accepting business hospitality or gifts.

Staff should never offer or accept any gifts or hospitality except if it complies with all of the following:

- it is not in cash or cash equivalent and not of excessive value;
- it is consistent with customary business practices;
- it cannot be construed as bribery or corruption; and
- it does not violate local law or regulation.

## 2.2. Political Activity

Unit4's resources are not permitted to be used for the pursuit of your personal political activity and no political endorsement can be made on behalf of Unit4 without prior approval. Additionally, you must ensure that your political views and activity cannot be construed as Unit4's endorsement. Your political views are your own and not Unit4's.

Any political endorsement or contribution on behalf of Unit4 must comply with applicable laws, be previously approved by the Board of Directors and the Legal Department and be properly recorded.

## 2.3. Corporate Opportunities and Delegation of Authority

Our Staff is expected to promote the interests of Unit4. Accordingly, any business opportunities that arise by virtue of your position at Unit4, are to be used solely to pursue and achieve Unit4's goals and not for personal benefit. You may not compete with Unit4 directly or indirectly.

You must also act strictly within the scope of the authority given to you by Unit4. Only certain individuals have the authority to bind, undertake obligations, commit resources or speak on behalf of Unit4.

## 2.4. Conflicts of interest

A "conflict of interest" exists when a person's private interests interfere or conflict in any way with the interests of Unit4.

You must avoid situations that present potential conflicts of interest, either real or perceived, and should not engage in activities that would make it difficult or appear to make it difficult for you to perform your work objectively and effectively. In no way should you personally profit from transactions based on your relationship with Unit4 if it harms Unit4, or if your personal gain is achieved at Unit4's loss.

Examples of when a conflict of interest may arise include, but are not limited to:

**Business Relationships.** Any business relationship that you enter into outside your work at Unit4 requires your good faith judgment and common sense. While you are an employee of Unit4, you are prohibited from accepting simultaneous employment with or otherwise working for any person or entity with which Unit4 has a business relationship, without the prior written consent of Unit4's Global Leadership Team. You are not allowed to work for a competitor in any capacity.



Full-time employees of Unit4 are expected to devote substantially all of their business time and attention to their employment with Unit4.

**Outside Directorships and Advisory Boards.** Before agreeing to serve as a member of the board of directors or advisory board of another entity, it is important for you to consider the potential conflicts of interest that could result. No employee or director of Unit4 should ever serve as a director or member of the advisory board for a company that directly competes with Unit4. You are required to obtain prior written approval the Chief People Officer prior to serving on the board of directors or advisory board of any entity with which Unit4 has a business relationship.

**Personal Investments.** If you are considering investing in an entity with which Unit4 has a business or competitive relationship, you should take great care to ensure that these investments do not compromise or appear to compromise your responsibilities to Unit4. Many factors should be considered in determining whether a conflict exists, including the size and nature of the investment, your ability to influence decisions of Unit4 or of the other company, your access to confidential information of Unit4 or of the other company, and the nature of the relationship between Unit4 and the other company. By way of example: when you hold (directly or indirectly) shares in such company, and you are engaged in business negotiations on behalf of Unit4 with such company and you (directly or indirectly) may be at risk of making conflicted decisions in the negotiation that are not in Unit4's best interests. If you are unsure, please contact the Legal Department.

**Related Persons.** As a general rule, you should avoid conducting Unit4 business with a Related Person without obtaining prior written approval from the Unit4 Legal Department. Related Persons means a spouse, parent, sibling, grandparent, child, grandchild, relative by marriage, or same or opposite sex domestic partner, any other family member that is financially dependent on you, and any company, partnership or other entity owned and controlled by any such relative.

Transactions that will lead to a conflict of interest are prohibited, except in very narrow circumstances where the Chief Executive Officer, the Board and General Counsel has given informed written consent to the transaction.

Whether a conflict of interest exists may not always be clear-cut, so if you have a question, you should consult with higher levels of management. If you become aware of a conflict or potential conflict, you should bring it to the attention of a manager or other appropriate team member.

## 2. 5. Social Media Guidelines

Unit4 recognises that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media. We encourage our Staff to use social media in a personal capacity and embrace the use of social media as a tool expand Unit4's business presence. Any use of social media that relates to Unit4 must comply with Unit4's Social Media Guidelines.

Unit4 prohibits any conduct that adversely affects Staff's performance or otherwise adversely affects Unit4's team members, customers, suppliers, business partners or our legitimate business interests. Unit4 does not tolerate inappropriate postings or communications that include discriminatory remarks, harassment, violence, or similar unlawful conduct. You must never disclose confidential information online such as our trade secrets; internal reports, policies or procedures; identifiable information of individual employees, contractors, customers, actual or prospective clients, business partners, or suppliers; business performance; financial forecasts or other material non-public information.

### **3. Fair and Ethical Business Practices**

#### **3.1. Fair procurement**

Unit4 outlines the principles and practices for conducting fair and transparent procurement processes. It sets out guidelines and procedures to ensure that procurement decisions are made in a fair and equitable manner, and details how we factor in ESG (Environmental, Social and Governance) as part of our procurement approach. Unit4 carries out appropriate due diligence of its prospective business partners that will form part of our supply chain.

All business partners are required to adhere to our Unit4 Business Partner Code of Conduct, and all Staff must follow our Global Procurement Policy and engage with the procurement team where required.

#### **3.2. Fair competition**

Unit4 supports the principle of free market competition as a basis for conducting its business and complies with all applicable competition laws, including, but not limited to, those relating to teaming and information sharing with competitors, price fixing and rigging bids. We aim to surpass our competition fairly, through honest, ethical and legal means. Unit4 does not tolerate the use of any improper means to achieve its business purposes.

#### **3.3. Anti-bribery and corruption**

Unit4 maintains the highest ethical standards and complies with all applicable laws, statutes, codes, and regulations relating to the prevention of bribery and corruption. It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

#### **3.4. Trade Sanctions and Export Controls**

Unit4 is a multinational company and must comply with all laws and regulations applicable to its operations and activities that restrict imports, exports and related activities, as well as certain dealings with certain specific countries, governments, entities and persons. These include all applicable export controls, sanctions, and antiboycott laws and regulations, as well as those of

other countries where we do business. Violations of such laws and regulations may result in the imposition of significant civil penalties, criminal fines and imprisonment, suspension of export privileges, and harm to Unit4's reputation.

In order to comply with such laws and regulations, any third parties with whom Unit4 does or wants to enter into a business transaction (including customers, suppliers, partners and contractors) must be screened against all applicable restricted party lists. Unit4 has implemented a tool that facilitates this screening.

Where applicable, Unit4 will train Staff members on any applicable laws.

### **3.5. Integrity of our communications**

Unit4 strives to ensure that any external and internal communication is clear, honest, accurate and timely.

In the performance of your duties, you must not knowingly make, or permit or direct another to make, materially false or misleading communications regarding Unit4, and shall correct materially false and misleading communications regarding Unit4 whenever detected.

In order to ensure the integrity of our communications, we limit the Staff authorized to speak for Unit4. In accordance with Unit4's Media and External Communications Policy, no Staff, apart from those who are employed to do so, should make comments to the media about any aspect of Unit4 unless they have been given express permission to do so.

### **3.6. Social and environmental responsibility**

Our ESG (Environmental, Social and Governance) program aligns with the UN Sustainable Development Goals – the world's best plan to build a better world for people and our planet.

Unit4 is committed to integrating ESG factors throughout its operations, and monitoring ESG performance in compliance with applicable EU and local laws and regulations, and the OECD Guidelines for Multinational Enterprises, including public reporting and disclosure of ESG information. Unit4 works to minimize any adverse effects of its activities on the environment and implement sustainable measures such as reduction of greenhouse gas emissions.

## **4. Company Assets and Information**

### **4.1. Use and protection of information**

Unit4 regards information for the purpose of its business as a corporate asset that must be protected against loss, infringement and improper use and disclosure. Unit4's assets and resources, including proprietary information, are to be used solely to pursue and achieve Unit4's goals and not for personal benefit. Proprietary information means our intellectual property (including patents, trademarks, copyrights and trade secrets) and any other confidential

information, such as commercial, operational, technical, legal or financial information related to Unit4 that has not been disclosed or made available to the general public (including marketing plans, engineering ideas, designs, databases and records).

Unit4 is committed not to make use of information disclosed to it by a third party if it is suspected that the discloser violates an obligation of confidentiality, unless the information: a) is generally available to the public other than as a result of disclosure by Unit4, b) has been developed independently by Unit4; or c) becomes available to Unit4 either on a non-confidential basis from a third party who is not bound by any confidentiality obligations or by operation of law.

You are responsible for the proper use, protection and conservation of business and proprietary information entrusted to you by Unit4 or its customers, suppliers or partners, including within Unit4, as confidential information should be shared only on a “need to know” basis.

## 4.2. Protection of Personal Data

During our business operations, Unit4 may collect and process personal data, including data we receive directly from a person (for example, by completing forms or by corresponding with us by mail, phone, email, or otherwise) and data we receive from other sources (including, for example, business partners, sub-contractors in technical, payment, and delivery services, credit reference agencies, and others). Unit4 protects this information and access it only for legitimate business purposes, ensuring compliance with all applicable data protection laws and requirements when processing any personal data, including the EU General Data Protection Regulation (GDPR).

You are expected to protect and remain responsible for the personal data we hold. For that purpose, you must:

- take reasonable and appropriate security measures against unlawful or unauthorized processing of personal data and against the accidental loss of, or damage to, personal data, exercising particular care in protecting sensitive personal data from loss and unauthorized access, use, or disclosure;
- follow all procedures, policies and technologies Unit4 puts in place to maintain cyber resilience and the security of all personal data from the point of collection to the point of destruction;
- only transfer personal data to third-party service providers who agree to comply with the required policies and procedures and who agree to put adequate measures in place, if requested;

- maintain data security measures to protect the confidentiality, integrity, and availability of the personal data we hold; and
- comply with all applicable aspects of our the administrative, physical, and technical safeguards we implement and maintain in accordance with applicable legislation and standards to protect personal data.

### **4.3. Information Security**

Information security is paramount to Unit4. Unit4 is committed to preserving the confidentiality, integrity, and availability of physical and electronic information assets throughout the organization. Unit4 promotes information security best practices and encourage vigilance over possible threats from any source by maintaining an Information Security Policy, regularly training Staff and putting in place measures to protect the integrity and confidentiality of information held on Unit4's systems. Collectively all Staff are expected to support keeping our information resources and information systems safe by following our information security policies.

### **4.4. Use of equipment and systems**

When using property, all Staff are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines. Please notify the manager /IT if any equipment, machines, or tools appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others.

Unless agreed otherwise by Unit4 or with an authorized Staff member, Unit4 equipment and systems are Unit4's property and should not be used for unrelated business, except for reasonable personal use. All Unit4 equipment must be returned to Unit4 on termination of employment or end of contract.

### **4.5. Artificial Intelligence**

Artificial intelligence systems are rapidly developing and have come to the forefront with publicly available systems. Unit4 recognizes that using AI has benefits but has certain limitations and may pose certain risks. In particular with a view to ensure the security of information, Unit4 has established an AI committee which sets the policies and guidelines in relation to the use of both publicly available and Unit4 supplied enterprise AI systems.

## **5. Compliance and consequences of violations**

### **5.1. Responsibility for every one of us**

U4 is committed to addressing concerns promptly and appropriately to uphold our values and ethical standards. You must remain committed to maintaining a culture of honesty and accountability contributes to the overall success of our mission.

You must ensure that you have read, that you understand and that you comply (in letter and in spirit) with this Code.

You must also:

- Report, as soon as possible, if you believe or suspect that a breach of this Code has occurred, or may occur in the future.
- Provide reasonable cooperation with any investigation that Unit4 undertakes.
- Seek help or advice from your manager, a local People Experience Consultant, and/or the Legal Department if any questions arise about any aspects of the Code or when in doubt about the best course of action in a particular situation.
- Understand and comply with specific laws and regulations and Unit4 policies that apply to your specific role.
- Complete any mandatory associated training that is offered to you.

We understand that in some situations it may be difficult to determine whether a violation has occurred or may occur. In such situations, you must seek advice and address your concerns as directed above.

## 5.2. Management responsibilities

Unit4 managers should be an ethical ambassador for the company by living the values and demonstrating accountability.

Managers should create a working environment that encourages employees to ask questions and address concerns. When managers are contacted by any Staff in relation to, or as advised by, this Code, they are required to take any concerns or complaints seriously, address the issue raised and direct the appropriate actions to be taken. It is the manager's responsibility to escalate the issue within the organization as appropriate.

## 5.3. Whistleblowing

If you believe or suspect that a breach of this Code has occurred, or may occur in the future, you are required to promptly report it. Unit4 has a Whistleblower System in place to enable Staff to submit complaints and violations of this Code on a confidential (and, if you so choose, anonymous) basis. Unit4's Whistleblower System and Whistleblowing Policy can be found [here](#).

Unit4 undertakes not to take disciplinary action against any of its Staff that has reported violations of this Code or who has sought advice regarding this Code. We will also not condone

any retaliation or punishment against any of the Staff who cooperates with any investigation or proceeding related to a violation of this Code. Whenever a situation so requires, we will strive to ensure your anonymity.

If you feel that you are being retaliated against or punished for reporting a violation or potential violation of this Code or for cooperating with any investigation or proceeding in this regard, you should promptly inform your Local People Experience Consultant and/or the Legal Department. Such situations will be investigated, and appropriate action will be taken.

#### **5.4. Consequences of failure to comply**

Any reports of alleged or suspected violations under this Code or any related internal policy will be promptly and thoroughly investigated. The investigation will be conducted by the appropriate members of Staff from the People Experience team and Legal or via the Whistleblowing channel and always respecting the protection of personal data. If, as a result of this investigation, a violation is confirmed to have occurred, the appropriate action will be taken. Such action shall be proportional to the offense and may include disciplinary action against the offender, termination of employment and legal proceedings (if the offender is subject to civil liability for losses suffered by Unit4 as a result of the violation). In addition, Unit4 will assess and implement any reasonable and necessary steps to prevent future violations of the same kind.

Certain violations of this Code may be directly related or lead to a violation of applicable law or regulation. If that is the case, other legal or criminal consequences may apply pursuant to local law. Staff will be informed of any such consequences for certain jurisdictions where we operate, if applicable. Unit4 will fully cooperate with the relevant authorities regarding any such alleged or suspected violation.

## **6. Review and version control**

### **6.1. Process for review**

This Code will be reviewed annually or as required following:

- Any legislative changes or changes to industry guidance that might impact on it.
- Any changes to other associated internal policies, processes or procedures.
- Any breach or other incident relating to the issues addressed in this Code.