Unit4 Code of Ethics and Business Conduct

Version
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In Business for People

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A Message from Simon Paris, Chief Executive Officer

Unit4's Code of Ethics and Business Conduct sets out our expectations and standards at Unit4 — of both the business and our people. It is an important tool to guide our decision-making and ensure we accomplish our objectives ethically. It reflects our values of **people first**, **choose curiosity**, **make an impact**, and **be genuine**.

It is important to remember that conduct is more than a policy. It's ingrained in our culture — it's who we are, what we do, and how we do it. We don't just follow the Code because it makes business sense; we follow the Code because it is the right thing to do. We advocate for what we believe in and remain committed to acting with integrity, equity, and compassion. Because that's how work should feel.

Our people make Unit4 what it is. We rely on each of you, regardless of position, geographical location or level, to commit to uphold the principles and practices laid out here. We must remain vigilant, ask questions, and give people the safety to speak up.

"We follow the Code because it is the right thing to do."

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A Message from Michelle Eisenberg, General Counsel

Our Code of Conduct is the cornerstone of our commitment to integrity and ethics at Unit4. It is not simply a set of rules. It is a statement of who we are.

At Unit4, we are on a mission to develop innovative technology that puts people first. As we drive and experience transformation, including the rapid evolution of AI, the opportunities for innovation and growth are immense. So too are the ethical considerations we must navigate. It has never been more important to act with integrity, honesty, fairness, and respect in everything we do.

I encourage each of you to read the Code carefully and apply its principles in your daily work and decisions. While no document can anticipate every situation, our values can guide us through any one of them. If you are unsure, our People Experience and Legal teams are here to help.

There are safe and secure routes to report a concern. Unit4 does not tolerate retaliation of any kind against those who raise concerns. We are without fear of retaliation. **Please speak up — your voice matters.**

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

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About Our Code

Unit4 is a leading provider of enterprise applications empowering people in service organizations. Our business solutions are designed to work for people, not against them. We are ‘in business for people’. This is not only our promise to our customers, partners and suppliers, but also our commitment to our employees and the communities around us.

The Unit4 Code of Ethics and Business Conduct sets out the values and principles that guide how we act — every one of us, everywhere we operate. It seeks to deter wrongdoing and to promote:

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

This Code applies to everyone who works for or on behalf of Unit4: employees, contractors, directors, and officers of Unit4 Group Holding B.V. and its holding companies and subsidiaries (referred to as “Staff” or “you” throughout).

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

In this Code, “applicable laws” means the laws, regulations, and codes from time to time in force in the applicable country where the Unit4 operations and/or where its workers are based. If an applicable law sets a higher standard than this Code, follow the law. If this Code sets a higher standard than applicable law, follow this Code.

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 ensuring it is effectively applied. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Code.

This Code sets Unit4’s baseline principles and standards. Where a Unit4 policy, procedure, or guidance document is more specific or more restrictive than this Code on a given subject, that policy, procedure, or guidance governs that subject; in all other respects, this Code prevails over any conflicting Unit4 policy, procedure, or guidance.

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1. Core Principles

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1.1 Core Values

The four values that unite Unit4, and guide everything we do:

- **People first — We put people first and everything else follows.**
- **Choose curiosity — We are an innovative company driven by curiosity to always do better.**
- **Make an impact — We go to work wanting to make a difference, and we are proud of what we accomplish.**
- **Be genuine — We are an inclusive company. 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.

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1.2 Our Shared Responsibility

Unit4 and its Staff seek to add value by pursuing innovation, operating with sound business practices, and contributing to the development of a sustainable society. Every member of Staff has a shared responsibility to uphold Unit4's values and maintain a culture of integrity, trust, and accountability.

Staff must:

- understand and comply with this Code, Unit4 policies, and applicable laws
- act ethically in all business dealings
- complete required compliance training on time
- promptly report suspected or actual violations through the available reporting channels
- cooperate fully and truthfully with investigations, including making relevant information or devices available where legally permissible
- seek guidance whenever uncertain about the right course of action

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1.3 Leading by Example

Our people leaders are instrumental in creating a working environment where ethical conduct is part of everything we do. Managers have the unique opportunity to inspire others by living the values and demonstrating accountability and fostering an environment where employees feel safe raising concerns without fear of retaliation.

Managers should create a working environment that encourages employees to ask questions and address concerns, and are expected to:

- Foster an open community
- Address ethical concerns proactively and decisively
- Use available resources and escalation paths as needed
- Ensure direct and indirect reports complete all mandatory compliance training and requirements timely
- Actively encourage employees to challenge and report questionable conduct, including where and how to report

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1.4 Ethical Decision-Making Framework

Although this Code does not explicitly address every issue or situation you may encounter at Unit4, it contains the guidelines, rules, and principles that must be followed when you are acting on behalf of the Company. While this Code offers comprehensive guidance, unforeseen situations may arise. The key to compliance with this Code is to follow the spirit of this Code and the law when this Code and the law do not provide specific guidance.

When in doubt, rely on this framework:

- *Is the action legal, ethical, and socially responsible?*
- *Does it align with the spirit of this Code and Unit4 values?*
- *Would Unit4 be proud to share this action publicly?*
- *Could I benefit from another person's perspective?*
- *Will there be any negative consequence for Unit4?*

By following this Code, utilizing this framework, and trusting each other, we ensure that integrity remains at the center of everything we do at Unit4.

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2. Speak Up

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Speak Up

Speak up whenever something does not look or feel right. There is no such thing as a concern too small to raise. Unit4 strictly prohibits retaliation against any person who raises a concern in good faith or cooperates with an investigation, even if the concern is ultimately not substantiated. Staff can raise concerns through any of the following channels:

Channel	Contact / Access	Best For
Your manager	Direct conversation	Day-to-day guidance; non-sensitive concerns
People Experience team	Internal HR portal / local PX Consultant	Employment, workplace, and HR concerns
Legal Department	legal@unit4.com	Legal questions
Whistleblower System	unit4.whistleblowernetwork.net (Anonymous reporting available)	Sensitive concerns; Code violations; retaliation
General Counsel	General.counsel@unit4.com (Only the General Counsel has access to this inbox)	Highly sensitive matters
Compliance Team	compliance@unit4.com	General compliance questions, conflict of interest matters

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3. Fair Labor and Employment Practices

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3.1 Labor and Human Rights

Unit4 respects the rights and dignity of all individuals and groups who may be affected by our operations, including Staff, customers, partners and suppliers. Our commitment is guided by internationally recognized human rights and labor standards, including 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 and do not engage or employ children.

Unit4 is committed to ensuring that no modern slavery, child labor, or related rights violations occur in any part of our business.

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3.2 Fair Employment Practices

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3.2.1 Fair Career Advancement and 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. No one will be treated less favorably on the basis of any protected characteristic. See the Anti-Discrimination and Harassment section of this Code for the full list of protected characteristics.

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

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3.2.2 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 Unit4 values in mind, our approach is designed to support and promote the health and wellbeing of all 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.

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3.2.3 Fair Dismissal

Unit4 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.

3.2.4 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 applicable laws.

3.2.5 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 applicable laws, regulations and prevailing labor relations and employment practices, the right of its Staff to be represented by labor or trade unions.

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3.2.6 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 their own wellbeing by electing the benefits that work best for them.

Unit4 collaborates with and meets our legal obligations to Works Councils and employee representative bodies where they exist.

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3.2.7 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. 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 for all Staff.

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3.2.8 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 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:

- Attracting, hiring, and growing exceptional talent with diverse perspectives
- Building an inclusive and supportive environment for everyone.
- Being a driving force for change in the tech industry

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3.2.9 Anti-Discrimination and Anti-Harassment

Unit4 is committed to providing an inclusive, respectful, and professional work environment in which all individuals are treated fairly and with dignity. **Unit4 prohibits discrimination, harassment (including sexual harassment), bullying, and retaliation based on any characteristic protected by applicable law**, such as race, color, ethnicity, national origin, nationality, religion or belief, sex, pregnancy, parental or family status, marital or civil-partnership status, sexual orientation, gender identity or expression, age, disability, veteran status, genetic information, or any other legally protected characteristic.

Prohibited conduct may be verbal, physical, visual, written, or electronic and may include unwelcome comments, slurs, jokes, threats, intimidation, exclusion, offensive materials, inappropriate physical contact, unwanted sexual attention, or other conduct that creates an intimidating, hostile, degrading, humiliating, or offensive environment. Conduct may be inappropriate regardless of intent and may consist of a single serious incident or repeated behavior.

These standards apply to all Staff and to interactions with applicants, customers, suppliers, partners, contractors, and other third parties whenever conducting Unit4 business, including in the workplace, while working remotely, during business travel, at Unit4-sponsored events, and through digital communications or social media. Staff who experience, witness, or become aware of possible misconduct should report it promptly through the channels described in the Speak Up section of this Code or as set forth in Unit4's Anti-Discrimination, Harassment and Bullying Policy.

Managers who receive a concern must promptly notify People Experience and must not undertake an investigation independently. Unit4 prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation and will address reported concerns promptly, fairly, and as confidentially on a need-to-know basis and in accordance with applicable law and the procedures set forth in Unit4's Anti-Discrimination, Harassment and Bullying Policy.

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4. Ethical Personal Conduct

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4.1 Personal Conduct and Integrity

Our Staff represents Unit4 and, in turn, shapes our reputation. We expect you to conduct yourself with integrity and in an ethical manner in all business settings, including client interactions, events, and any social context associated with your role.

4.2 Corporate Opportunities and Delegation of Authority

Business opportunities arising by virtue of your position at Unit4 belong to Unit4. You may not exploit them for personal benefit, and 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.

4.3 Political Activity

Unit4's resources, including systems, equipment, time, and branding, may not be used for personal political activity. Your political views are personal to you, not to Unit4.

Any political endorsement or contribution on behalf of Unit4 must comply with applicable laws, receive prior approval from the Board of Directors and the Legal Department, and be properly recorded.

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4.4 Gifts and Business Hospitality

As indicated in our Anti Bribery and Corruption Policy (“ABC Policy”), 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;
- it is of modest value;
- it is consistent with customary business practices;
- it cannot be construed as bribery or corruption; and
- it does not violate applicable laws or regulations.

Never offer anything of value (including gifts, meals, hospitality, or charitable donations) to a government official or public-sector employee without prior written approval from the Legal Department.

Facilitation payments, which are payments made to a government official to speed up or secure routine government action, are strictly prohibited, regardless of local custom or practice.

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4.5 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.

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.

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. You may not accept simultaneous employment with, or otherwise work for, another entity, except as permitted and approved by the Global Leadership Team. 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. Before accepting any other board, advisory, or technical advisory position, obtain prior written approval from the Chief People Officer.

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4.5 Conflicts of Interest

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. Whether an investment or financial interest creates a conflict depends on factors including the size and nature of the investment, your ability to influence either Unit4's or the other company's decisions, your access to confidential information of either company, and the nature of the relationship between Unit4 and the other company. If you are unsure, contact the Legal Department.

Related Persons. As a general rule, avoid conducting Unit4 business with, or supervising, a Related Person without prior approval from the Legal Department. A Related Person is 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.

A transaction with a Related Person that would itself create a conflict of interest is prohibited, except in very narrow circumstances where the Chief Executive Officer, the Board and General Counsel have given informed written consent to the transaction.

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4.6 Social Media Guidelines

Unit4 recognizes that social media can support professional engagement and the responsible promotion of our business. Staff may use social media in a personal capacity, but any use relating to Unit4, its Staff, customers, suppliers, or partners must comply with this Code, Unit4's Social Media Guidelines, and applicable law.

Unless authorized, Staff must not speak on behalf of Unit4 or suggest that their personal views represent Unit4. Communications must be respectful and must not be discriminatory, harassing, threatening, defamatory, knowingly false or misleading, or otherwise unlawful.

Staff must not disclose confidential, proprietary, personal, or material non-public information online and must respect privacy, intellectual-property, information-security, and external-communications requirements. Only authorized spokespersons may make official public or media statements on Unit4's behalf. If uncertain about a proposed communication or aware of an unauthorized disclosure, Staff should promptly contact Communications, Legal, or Information Security.

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5. Fair and Ethical Business Practices

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5.1 Fair procurement

Unit4 conducts procurement transparently and fairly, via guidelines and procedures that are designed to ensure that procurement decisions are made in an equitable manner, integrating ESG (Environmental, Social and Governance) factors into our approach.

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.

5.2 Fair Competition

Unit4 competes on the merits of its products and services. We comply with all applicable competition and antitrust laws globally.

You must never discuss pricing, market allocation, bid coordination, or other competitively sensitive topics with a competitor, including directly or informally at industry events, or through trade associations. If a competitor raises such topics, disengage immediately and contact the Legal Department.

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5.3 Anti-Bribery and Anti-Corruption

Unit4 has zero tolerance for bribery and corruption in any form, in dealings with private parties and government officials alike, in every jurisdiction where we operate. 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. Further, Staff are required to adhere to our internal ABC Policy.

5.4 Trade Sanctions and Export Control

Unit4 is a multinational company and must comply with 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.

All third parties with whom Unit4 transacts must be screened against applicable restricted party lists before engagement. Staff who are required to understand or comply with applicable trade sanctions and export control laws will receive appropriate training.

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5.5 Integrity of Our Communications

Unit4 strives to ensure that any external and internal communication is clear, honest, accurate and timely. All internal and external communications about Unit4 must be truthful, accurate, and complete. 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.

Only designated spokespersons may make public statements on behalf of Unit4, in accordance with Unit4's Media and External Communications Policy. If you receive a media enquiry, refer it immediately to the Corporate Communications team.

5.6 Social and Environmental Responsibility

Our Environmental, Social and Governance program aligns with the UN Sustainable Development Goals and is guided by the OECD Guidelines for Multinational Enterprises. We integrate ESG across our operations, monitor performance against applicable law, publicly report our progress, and work to reduce our greenhouse gas emissions and environmental footprint.

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6. Company Assets and Information

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6.1 Use and Protection of Information

Unit4 information and resources are corporate assets and must be protected from loss, misuse, unauthorized access, and disclosure. Staff may use them only for legitimate Unit4 purposes, subject to any permitted reasonable personal use. Confidential and proprietary information includes intellectual property and non-public commercial, operational, technical, legal, financial, customer, supplier, and partner information.

Staff must not use or disclose third-party information where they know or reasonably suspect that doing so would breach a confidentiality obligation. This does not apply to information that is lawfully public, lawfully received without a duty of confidentiality, or required to be disclosed by law.

Staff must safeguard information entrusted to them by Unit4 or its customers, suppliers, and partners and share confidential information only with authorized people who have a legitimate need to know.

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6.2 Protection of Personal Data

Unit4 processes personal data only for legitimate business purposes and in accordance with applicable data-protection laws, including the EU General Data Protection Regulation where applicable. Staff must access and use personal data only as authorized and necessary for their roles.

Staff must follow Unit4's privacy, security, retention, and incident-reporting requirements; protect personal data against unauthorized or unlawful processing, loss, damage, or disclosure; use approved systems and service providers; and promptly report any actual or suspected personal data incident through the required channels.

6.3 Information Security

Unit4 protects the confidentiality, integrity, and availability of its physical and electronic information assets. Staff must follow Unit4's information security policies, complete required training, remain alert to threats, use only approved systems and controls, and promptly report actual or suspected security incidents through the required channels.

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6.4 Artificial Intelligence

Unit4 develops and uses AI in its products and internal operations. Staff must use AI responsibly, lawfully, and in accordance with current Unit4 AI Board guidance, Unit4's AI Policy and guidelines, and all applicable privacy, security, intellectual property, employment, and regulatory requirements.

Staff must not use AI to deceive or unlawfully manipulate or profile individuals; engage in prohibited biometric categorization or unlawful workplace monitoring; infringe third-party rights; or input confidential Unit4, customer, partner, or personal data into any AI systems unless the AI system and use case have been approved by the AI Board. When uncertain, seek guidance from the AI Board, Legal, Privacy, or Information Security before proceeding.

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6.5 Use of Equipment and Systems

Staff must use Unit4 equipment and systems responsibly, follow applicable operating and security requirements, and promptly report loss, damage, defects, or suspected compromise to the applicable Unit4 teams.

Unless expressly authorized, Unit4 equipment and systems may be used only for Unit4 business, except for reasonable incidental personal use that does not interfere with work, security, or policy requirements. All Unit4 property must be returned when employment or engagement ends.

6.6 Insider Trading

Staff may obtain material non-public information about Unit4 or another company through their work. Staff must not trade in securities, recommend that another person trade, or disclose such information for trading purposes until it has been publicly released and any applicable restrictions have ended.

Information is material if a reasonable investor would consider it important when deciding whether to buy, hold, or sell securities, and non-public if it has not been broadly disclosed through an authorized channel. Contact Legal before trading if there is any doubt.

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6.7 Records and Financial Integrity

Unit4's financial and non-financial records must be accurate, complete, timely, and retained in accordance with applicable law and Unit4's records-retention requirements.

Staff must:

- create truthful records
- never conceal, falsify, or make misleading entries
- preserve information subject to a legal hold or investigation regardless of normal retention periods
- promptly report suspected fraud, accounting irregularities, or improper record-keeping to Legal or through the Whistleblower System

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7. Compliance, Consequences of Violations and Code Governance

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7.1 Your Responsibilities

Unit4 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. Unit4 is committed to addressing concerns promptly and appropriately.

Staff must promptly report suspected or actual violations through any channel identified in the Speak Up section of this Code. The Whistleblower System permits confidential reporting and, where legally available, anonymous reporting. Unit4's Whistleblower System and Whistleblowing Policy can be found here.

7.2 No Retaliation

Unit4 prohibits retaliation against anyone who, in good faith, raises a concern, seeks guidance, or participates in an investigation. Reports will be handled as confidentially as reasonably possible, consistent with applicable law and the need to investigate and respond appropriately.

Anyone who believes they have experienced or witnessed retaliation should report it promptly through the Speak Up channels.

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7.3 Consequences of Failure to Comply

Unit4 will assess reported concerns promptly, fairly, and in accordance with applicable law and relevant policies. Investigations will be conducted by appropriately authorized personnel and with due regard for confidentiality, privacy, and procedural fairness. Substantiated violations may result in corrective or disciplinary action, up to and including termination of employment or engagement, and referral to law enforcement or other authorities where appropriate.

Unit4 may also take reasonable steps to remediate harm, strengthen controls, and prevent recurrence. Nothing in this Code limits any rights or obligations arising under applicable law.

7.4 Code Review and Updates

This Code will be reviewed at least annually and updated as appropriate to reflect changes in law, regulatory or industry guidance, related Unit4 policies and procedures, or lessons arising from reported concerns and compliance incidents.

7.5 Waivers

Any waiver of a requirement of this Code for a member of Staff must be approved in writing by the General Counsel.

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