



Rocket Software Code of Conduct



Foreword by Milan Shetti



Rocketeers,

As we reflect on the remarkable milestones we've achieved together, it fills me with an immense sense of accomplishment. Beyond delivering outstanding software solutions, Rocket Software has fostered an exceptional culture that I am extremely proud of.

Our commitment to our core values — **Empathy, Humanity, Trust, and Love** — is the essence of our daily interactions with colleagues, customers, partners, and suppliers. It's not just a commitment; it's ingrained in everything we do. Recognizing that our partners and suppliers are extensions of the Rocket Software family, it's critical that we select partners and suppliers that we resonate with and that share our core values.

Integrity and the highest ethical standards are non-negotiable principles for every Rocketeer. This guide demonstrates our commitment to comply with applicable laws while we continue to aspire to the elevated standards we've established for ourselves.

Together, we've laid a stable foundation, and I am genuinely excited about the future that awaits us. Our collective commitment to excellence and our core values will undoubtedly propel us to new heights.

Thank you,

Milan Shetti

President and CEO
Rocket Software

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I. Introduction and Commitment to Our Values

The Rocket Software Code of Conduct (the “Code”) is one of the ways Rocket Software, Inc. and its group of affiliates (together, “we”, and “Rocket Software”) and our employees and directors (together, “you”, “Rocketeers” and “we”, and “us” in context) put Rocket Software’s values of **Empathy**, **Humanity**, **Trust**, and **Love** into practice. We expect our customers, partners, and suppliers to adhere to the relevant aspects of our Code during our engagement with them. Our collective effort is critical to deliver products and services that our customers love.

Rocket Software’s Values



Empathy is the power to walk in someone else’s shoes and helps us relate to our customers and one another in a more personal and authentic way.



Humanity expresses the reality that everything we do is a transaction between people – we are not machines, we are humans sharing a human experience and deserve to be treated with care and heartfelt attention.



Trust is presumed by us and built with our customers over a series of promises kept over and over again by Rocketeers.



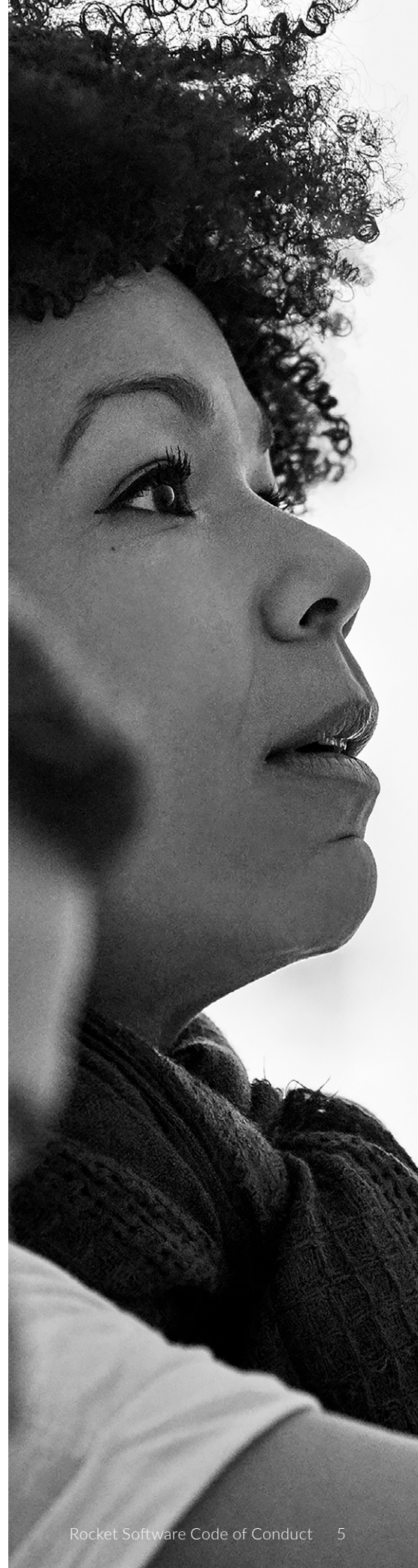
Love is the genuine feeling of gratitude we share and express for the relationships we craft with one another, and the support we give to one another.

We set the bar high for Rocketeers because we know that our commitment to ethical conduct helps us hire great people, build great products, and attract and retain loyal customers and partners. Serving our customers and partners well means that we follow our company values in our interactions with them and that we act with integrity and trustworthiness to provide products and services that add value. In addition to following this Code, Rocketeers are also expected to review and follow the guidelines set forth in the Rocket Software Commitment to Serve Each Other, our Customers, and Partners which describes our commitment to each other, our customers, and partners in greater detail.

The guiding principles covered here are designed to help us adhere to the highest level of ethical conduct in all our activities. You are expected to know and comply with this Code, as well as the following basic principles, when doing business with or on behalf of Rocket Software:

- Respect and obey the law at all times
- Treat each other fairly and with respect and dignity
- Maintain a safe working environment
- Maintain good records and account for and disclose all information about Rocket Software honestly, and according to professional and legal requirements
- Compete fairly and honestly, avoiding bribery or other inappropriate acts
- Understand the appropriate use of Rocket Software assets and confidential information and protect them accordingly
- Avoid conflicts of interest that may compromise Rocket Software

This Code is not intended to supersede, modify, or alter existing Rocket Software policies and procedures. This Code should be read together with such policies and other documents.



Rocketeers are expected to have read and understood all Rocket Software policies (which can be accessed in Workday, our HRIS tool, or on the Intranet), as updated from time to time, and to attend (and/or complete) all mandatory training.

We encourage you to consult with your manager, your People Business Partner or our Chief Legal Officer for additional guidance or if you have any questions about this Code or how to comply with our values. Any suspected violation of this Code *must* immediately be reported to your manager, your People Business Partner, or the Chief Legal Officer. You can also report violations via our third-party reporting portal, Speak Up.

The Speak Up portal is managed by a reputable third party that is not affiliated with Rocket Software and allows individuals to report online or via a toll-free number. The Speak Up portal provides an anonymous reporting option if you feel more comfortable reporting anonymously (see [Section XI](#) below for more details on how to report a suspected violation).

How to Report Violations – Speak Up

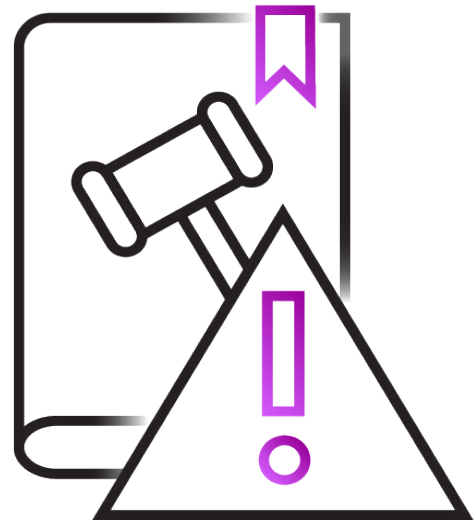
Any suspected violation of this Code must immediately be reported to your manager, your People Business Partner, the Chief Legal Officer, or via our third-party reporting portal, Speak Up. Speak Up also includes an anonymous reporting option if you feel more comfortable reporting anonymously. You can reach Speak Up by visiting www.rocketsoftware.ethicspoint.com.



II. Compliance with Laws

We are committed to conducting our business affairs in compliance with all applicable laws, rules, and regulations. As a company that provides its products and services globally, we are subject to the laws and regulations of the various jurisdictions in which our business is conducted.

In line with our culture of compliance and accountability, Rocketeers are expected to have a basic understanding of the major laws and regulations that apply to their work and to comply with them (and to attend any required training relating to the same).



III. Employment and Workplace Conduct

We are committed to running our business with Humanity and supporting human rights globally. Our goal is to provide a safe workplace that is free of harassment, intimidation, bias, and unlawful discrimination for all Rocketeers.



Humanity expresses the reality that everything we do is a transaction between people – we are not machines, we are humans sharing a human experience and deserve to be treated with care and heartfelt attention.



Non-Discrimination; Equal Opportunity Employment

Rocket Software is an equal opportunity employer. Employment at Rocket Software is based on individual merit and qualifications directly related to professional competence. We prohibit unlawful discrimination or harassment on the basis of race or ethnic origin, nationality, veteran status, ancestry, pregnancy status, sexual orientation, gender identity or expression, age, marital status, mental or physical disability, medical condition, religion, faith or philosophical belief, political opinion or union membership, or any other characteristics protected by law. We also prohibit discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.

Rocket Software will seek to make reasonable accommodations available, as appropriate, to meet our obligations under applicable disability laws.



Bullying and Harassment Prohibited

Rocket Software is committed to maintaining a workplace free from violence and unlawful harassment of any kind, including sexual harassment and other unlawful harassment on the basis of race or ethnic origin, nationality, veteran status, ancestry, pregnancy status, sexual orientation, gender identity or expression, age, marital status, mental or physical disability, medical condition, religion, faith or philosophical belief, political opinion or union membership, or any other characteristics protected by law. Without limitation, this policy governs conduct both in the workplace and at any other location where a Rocket Software-sponsored event takes place. This policy extends to partner events, industry events, and volunteer events and applies to the treatment of all parties, including partners, customers, and suppliers. It also covers conduct that is oral, written, visual, or electronic (including email and Slack).



Compliance with Global Labor Laws

Rocket Software requires Rocketeers to comply with applicable global legal requirements relating to labor practices, working time, and the payment of wages (including minimum wage laws, overtime and working hours, rates, and other compensation elements). Where applicable to your employment or engagement by Rocket Software, you must report your hours honestly and lawfully.

Rocket Software is against any form of modern slavery and human trafficking, which includes slavery, servitude, forced and compulsory labor, child, and underage labor. Rocket Software requires all suppliers to comply with all applicable laws, including those relating to modern slavery and human trafficking (see also [Section VIII](#) below for supplier requirements).



Health and Workplace Safety

Rocket Software is committed to providing a safe and healthy workplace for its employees. Rocketeers are responsible for maintaining a safe and healthy work environment that meets our safety practices and guidelines, as well as all applicable laws. Rocketeers are expected to follow all applicable health and safety rules and practices and to report accidents, injuries and unsafe conditions, procedures, or behaviors (whether working from home or one of our offices or other locations). Rocketeers are also expected to report to work in a condition to perform their duties, free from the influence of illegal drugs or alcohol.



Freedom of Association

Rocket Software and Rocketeers are best served through a collaborative working environment, and we strive to create open, transparent, and constructive communication between employees and the Rocket Software management for the benefit of all. Rocketeers are free to discuss any employment issues among themselves or outside Rocket Software. Rocket Software respects the legal rights of Rocketeers and Rocketeers are free to form and participate in work councils or to join (or to refrain from joining) worker organizations and trade unions. Rocket Software complies with legal requirements worldwide regarding employees and their worker representatives and third-party representation.

Rocket Software also encourages Rocketeers to meet in person or virtually for social events and activities, including through the Community Connector program, for the exchange, cultivation, and development of Rocket Software culture, ethics, and values.

IV. Financial; Truth and Accuracy; Record-Keeping

We operate our business with Trust. Having accurate and trustworthy records is critical to our ability to run our business. We must all do our part to ensure our records can be relied on by all our stakeholders.



Trust is presumed by us and built with our customers over a series of promises kept over and over again by Rocketeers

1. Misrepresentation or Falsification

Making false statements is unethical, is prohibited under this Code, and in certain circumstances is illegal and can carry severe consequences for not only the individuals involved, but for Rocket Software. All documents and communications concerning conducting business with or on behalf of Rocket Software must be truthful, complete, and accurate.

All dishonest activities and fraud are forbidden, including mishandling or theft of money or assets, money laundering, bribery and corruption, terrorist financing, misrepresentation, and falsification or forgery of documents. In addition, Rocketeers must not misrepresent, manipulate or exaggerate the potential of a sale, forecast, or pipeline to obtain favorable commission payments or other benefits.

Rocketeers should not take unfair advantage of anyone, including customers, partners, investors, other stakeholders, suppliers, or competitors. Taking unfair advantage includes engaging in manipulation, concealment, misuse of confidential information, misrepresentation of material facts, and any other unfair dealing.

If you become aware of, or suspect, dishonest activity or fraud relating to Rocket Software, please inform us immediately (see Section IX below for how to report a suspected violation).

2. Accounting or Audit Irregularities and Internal Controls

Rocket Software's records serve to manage our business and are critical to our operations and must be accurate and a true reflection of our activities, transactions, revenue, outgoings, investments, and assets. Inaccurate financial reporting could undermine investor confidence, impact our reputation, and subject Rocket Software to fines and penalties.

All Rocketeers must ensure our financial records are complete and accurate and internal controls are honored, including contracts, reports, records of transactions, time-sheets and working-time reports, expense claims, and similar.

In particular:

- No accounting or financial entry should be recorded that masks, hides or disguises its nature or character or classification or accounts or accounting periods.
- All transactions must be supported with appropriate evidence, invoices, or documentation.
- The terms of sales and other commercial transactions must be accurately reflected in the documentation for those transactions in our financial recording and book-keeping systems.

3. Corporate Credit Cards

If you have been issued a Rocket Software credit card for your use when traveling, you must only use the card for Rocket Software business purposes and must comply with the Rocket Software Travel and Expense Policy.

4. Expense Reporting and Expense Claims or Purchases

If you are submitting an expense report or spending money on Rocket Software's behalf, please read and adhere to Rocket Software's policies, including its Procurement Policy, applicable FAQs, and the Rocket Software Travel and Expense Policy and comply with submission requirements. Make sure that the cost is reasonable, directly related to Rocket Software's business, and supported by appropriate documentation. If you are uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports and should carefully review such spend and expenses before approving.

If your role involves reviewing expense reports, report any transactions you believe are incorrectly recorded.

5. Insider Trading

Rocketeers must not improperly, either directly or through a third-party, use inside or nonpublic information, about Rocket Software or another company (including customers, partners or suppliers) that is learned while conducting business with or on behalf of Rocket Software for any personal purposes. This also means that Rocketeers are expressly prohibited from buying or selling securities based on such inside or non-public information or passing such information on to anyone else, unless and until the information is public. See Section VI below for more information on how Rocket Software's confidential information should be treated.

V. Business Operations

We operate our business with Empathy and believe in the importance of operating with integrity. It is important that we all understand and comply with applicable laws (including antitrust, fair competition and export laws) and that we do not engage in bribery, excessive gift-giving or any form of corruption. Violations of the laws described in this section could result in imprisonment for you or severe penalties for Rocket Software and any suspected violations of these laws should be reported immediately (see [Section IX](#) below for how to report a suspected violation).



Empathy is the power to walk in someone else's shoes and helps us relate to our customers and one another in a more personal and authentic way.

1. Antitrust and Fair Competition

Rocket Software is committed to competing fairly and honestly. Rocket Software's business activities are subject to the antitrust and competition laws of numerous jurisdictions, including the United States and its individual states as well as other countries and jurisdictions in which Rocket Software conducts business. Rocketeers are required to be aware of the antitrust or competition laws that govern Rocket Software's business.

Rocketeers should treat customers, partners, competitors, and other stakeholders and decision makers fairly. This means we should not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair practices.

Antitrust laws are designed to protect the free market and encourage competition and are very complex. In general, these laws prohibit activities aimed at preventing or restricting free competition, abusing intellectual property rights, or using market power to unfairly disadvantage competitors. Competition laws apply to formal and informal communications (including trade association activities and informal communications among competitors, customers, suppliers, or other Rocket Software colleagues). Examples of prohibited conduct include:

- Agreeing with competitors about prices
- Agreeing with competitors to rig bids or to allocate customers or markets

- Agreeing with competitors to boycott a supplier or customer
- Sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors
- Entering a business arrangement or pursuing a strategy with the sole purpose of harming a competitor

2. Compliance with Export Rules

Rocket Software sells software products to customers in many countries and has end users all over the world. That is why Rocket Software and Rocketeers must adhere to U.S. export laws and international and other countries' local laws, as applicable, regarding sanctions and embargoes. Rocket Software may not export or re-export software products to countries, specific companies, or individuals that are sanctioned by the U.S. Government or the international community. Please use the systems and resources we have in place to check if a customer, partner, supplier (or prospective partner, customer or supplier) is subject to international sanction laws or reach out to the Legal Department if you have any questions.

3. Bribery and Corruption

Rocket Software does not tolerate corruption in connection with any of our business dealings. Rocketeers must be aware of and comply with anti-bribery and anti-corruption laws throughout the world, including the U.S. Foreign Corrupt Practices Act of 1977 and the U.K. Bribery Act 2010.

Bribery (including “kickbacks”) in all forms is prohibited by Rocket Software, regardless of whether there is a “corrupt” or improper intent. Rocketeers must never, directly or indirectly, give, ask for, or take a bribe or kickback in any form, including giving, promising, offering, or authorizing payment of anything of value to obtain or retain business, to secure some other improper advantage, or to improperly influence a government official’s actions.

Please note that these requirements apply to Rocketeers globally and must be followed (even if certain payments are not illegal in a particular jurisdiction or are considered accepted business practice in that geography).

4. Gifts and Entertainment; Political Donations

Accepting gifts, entertainment, and other business courtesies from a customer or partner can create the appearance of a conflict of interest or have the potential to violate anti-bribery laws, especially if the value of the item is significant. Generally, acceptance of inexpensive “token” non-cash gifts from business associates is permissible. In addition, infrequent and moderate business meals and entertainment and infrequent invitations to attend local sporting events and celebratory meals with customers or partners can be appropriate aspects of many Rocket Software business relationships, provided that they are not excessive and do not create the appearance of impropriety. Best practice: Give Rocket Software-branded gifts. They promote our brand and are of lower value.

Notwithstanding the above, never offer, give, promise, or provide a gift, lavish or excessive entertainment, funding of personal travel such as sightseeing, contributions to charity or employment opportunities to a government official for any reason whatsoever — not even as a token of thanks! “Government officials” include officeholders, political party members or candidates, employees, or any employee of government-owned or — controlled companies, public international organizations or political parties.

VI. Protection and Proper Use of Company Confidential Information and Assets

Treating each other with Love means we care about each other, our customers, and our business. We have an obligation to treat company assets appropriately and to keep Rocket Software's confidential information, including intellectual property and personal data, confidential.



Love is the genuine feeling of gratitude we share and express for the relationships we craft with one another, and the support we give to one another.

1. Information Systems/Network Security; Company Assets

Rocket Software's corporate electronic facilities (e.g., information technology systems, networks, data centers and communication tools, as well as the hardware and software associated therewith, such as our computers, workstations, and mobile apps) are critical Rocket Software assets that allow us to carry out our work. You should protect these assets against loss, damage or theft, and use them only for legal, appropriate reasons in accordance with Rocket Software policies (including the Rocket Software Acceptable Use Policy). Security is everyone's responsibility and we expect Rocketeers to do everything they can to keep Rocket Software safe.

As a reminder, Rocket Software's corporate electronic facilities are owned by Rocket Software and Rocket Software may choose to monitor, access, and disclose employee communications and other information stored there. If you store Rocket Software data on a personal device, Rocket Software may take action to monitor, access and disclose such information as well. There are many reasons for Rocket Software to take these actions, including for security purposes, investigating suspected employee misconduct, in connection with court proceedings or in response to a subpoena or warrant.

Suspected or actual violations of this section or any loss of a corporate electronic device or unauthorized access should be reported immediately to Rocket Software's IT/Security Teams by sending an email to security@rocketsoftware.com (or by following the reporting process set forth in [Section IX](#) below).

2. Intellectual Property; Open Source Software

Rocket Software’s intellectual property rights (i.e. our trademarks, logos, brand names, copyrights, trade secrets, “know-how,” and patents) are also valuable Rocket Software assets. Unauthorized use can lead to their loss or serious loss of value and is prohibited under this Code. Likewise, we require Rocketeers to respect the intellectual property rights of others, especially those of our customers and partners. In short, we expect Rocketeers to take intellectual property rights seriously — Rocketeers must properly license any third party software they use and comply with all license requirements (including open source) and protect our own code from misuse or misappropriation.

Rocket Software is committed to open source software development. Consistent with our policy of respecting the valid intellectual property rights of others, we strive to comply with the license requirements under which open source software is distributed. Failing to do so may lead to legal claims against Rocket Software, as well as significant damage to our reputation and standing in the open source community.

If you want to use intellectual property from individuals outside the company or allow a third party to use Rocket Software intellectual property, you must ensure that the terms of that arrangement are reviewed by a member of the Legal Department to ensure appropriate license and use rights are documented. If the desired use relates to a Rocket Software logo or brand, a member of the Marketing Department must also approve.

3. Protecting Confidential Information and Personal Data; Privacy

Rocket Software confidential information plays a vital role in our continued growth and ability to compete. Rocket Software confidential information includes intellectual property, financial, marketing, product, strategic and other internal business information relating to Rocket Software. Rocket Software must also protect any confidential information we receive from our employees, customers, partners and prospective employees, customers and partners and others. You must not use or disclose this information without a valid business purpose and proper authorization.

At all times, employees, directors, partners, and suppliers must take precautions to protect Rocket Software confidential information and personal data, including following all guidelines of our IT/Security Teams, and not disclose or publish information that is proprietary, confidential, or sensitive.

With respect to personal data collected by Rocket Software, all Rocketeers, partners and suppliers must keep personal information safe and follow all applicable data privacy laws (including the General Data Protection Regulation (“GDPR”), California Consumer Privacy Act (“CCPA”), and the UK Data Protection Act 2018 (“DPA”), video and audio recording laws and Rocket Software policies for processing, collecting, storing, using, sharing, and disposing

of personal information. This information must be kept secure, in confidence, and used consistent with the purposes for which it was collected and as described in Rocket Software's privacy policies. For more information about our privacy practices generally, please see our Global Data Protection and Privacy Notice (<https://www.rocketsoftware.com/company/legal/privacy-policy>) and for more information about our privacy practices as it relates to applicants and employees, please see our Global Data Privacy Notice for Personnel (<https://www.rocketsoftware.com/global-data-privacy-notice-personnel>).

If you find you have received access to confidential Rocket Software information, customer data, or personal information that should not have been disclosed to you (or that others have accessed such information) or if you are aware of any suspected or actual violations of these requirements, you must report it immediately (see [Section IX](#) below for how to report a suspected violation).

4. Social Media and Press

Rocket Software recognizes that the Internet allows Rocketeers to participate in interactive discussions, share information, and advance business objectives using an ever-increasing number of social media sites and tools, such as Facebook, WeChat, LinkedIn, Instagram and X, formerly known as Twitter. At the same time, use of social media can pose risks to our confidential information, reputation and brands, and can jeopardize Rocket Software's compliance with applicable laws, regulations, and business rules. You must ensure your outside communications (including online and social media posts) do not disclose confidential information or represent (or otherwise give the impression) that you are speaking on behalf of Rocket Software unless you are expressly authorized to do so by the Rocket Software Marketing Department. The Rocket Software Marketing Department will often send emails that give links to suggested social media postings for sharing on personal social media accounts and participating in those program is permitted and encouraged.

Postings/communications made through social media are or can become public and they may be difficult or impossible to rescind. Rocketeers are accountable for what they post online. We reserve the right to monitor social media sites about discussions of Rocket Software, our business, and our fellow employees.

Only limited individuals are permitted to speak on behalf of Rocket Software on social media or to the press. Please check with your manager, Chief Marketing Officer, Chief People Officer, or Chief Legal Officer before accepting any public speaking engagement on Rocket Software's behalf or if you have any questions.

VII. Conflicts of Interest

A conflict of interest is any activity that is inconsistent with or opposed to Rocket Software’s best interest, or that gives the appearance of impropriety or divided loyalty. Employees must avoid an overlap of personal interest with their Rocket Software responsibilities. All employees must disclose actual or potential conflicts of interest at the time of hiring and on an ongoing basis to a member of the People Team or Legal Department, which will make appropriate determinations in accordance with the Code and other applicable policies. This includes actual or potential conflicts involving business or financial interest or family or other personal relationships. Please keep in mind that a deliberate action does not need to be taken in order to create a violation of this policy — it can arise simply as a result of circumstances.

A conflict of interest occurs when a person is in a position to make or influence a Rocket Software business or financial decision that may result in gain or perceived gain to such person; to a family or other person with whom the person has a close relationship; or a business or other nonprofit affiliation of a person. A business or financial conflict can arise when the benefit accrues to an organization in which the person serves or is negotiating in the future to serve.

Many of our employees may have relatives who work for, or have investments in, our customers, suppliers, other business partners, or competitors. Having a personal relationship with any third party that you work with can suggest to others that you give preferential treatment to your friends and family. Conflicts may arise if either your relative interacts with Rocket Software on the third party’s behalf, or if you have discretionary authority in dealing with that third party. Occasionally, friendships you develop with individuals associated with our customers, suppliers, or other business partners may also have at least the appearance of influencing your actions on behalf of Rocket Software.

Conflicts of interest may not always be clear-cut. To help identify a conflict, think about your personal, or business interest from another person’s point of view and ask yourself whether the action you are considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Rocket Software. If the answer is “yes,” the action you are considering is likely to create a conflict-of-interest situation, and you should avoid it.

The following are examples of prohibited conflicts of interest:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor, or any entity that engages in business with Rocket Software
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, customer, competitor, or any entity that engages in business with Rocket Software
- Receiving from or giving to any supplier, customer or competitor gifts, gratuities, special allowances, discounts, loans, or other advantages not generally available to employees of Rocket Software
- Having any significant direct or indirect personal interest in a business transaction involving Rocket Software
- Conducting outside activities that materially detract from or interfere with the full and timely performance of your job duties for Rocket Software
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on Rocket Software or its business

If you find that you have, or are considering the assumption of a financial interest, outside employment relationship, or any other business or personal activity that might involve a conflict of interest, or if you are in doubt of whether any conduct or activity may constitute a conflict of interest, you should promptly discuss the matter with us by contacting us (see [Section IX](#) below for who to contact). If we determine the matter to be a conflict of interest, then you must withdraw yourself from such activity or situation creating the conflict. A failure or omission to disclose a conflict or potential conflict of interest may lead to disciplinary action up to and including termination of employment.

This policy in no way prohibits employee affiliations or activities that are protected under applicable state and federal laws, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to organize collectively and to speak with others about their terms and conditions of employment.

VIII. Supplier and Partner Obligations

Strong partner and supplier relationships are critical to Rocket Software's business. It is our goal to build trust-based relationships with ethical partners and suppliers who follow our values. We expect our partners and suppliers to follow the guidelines set forth above to the extent they are applicable to the products and services they provide to Rocket Software.

In particular, we expect our partners and suppliers to:

- Share our commitment to conducting business honestly and transparently and honor business obligations
- Know and follow laws that apply to them and their business (in accordance with [Section II](#))
- Treat their employees and contractors in compliance with all applicable global legal requirements, including those relating to modern slavery and human trafficking, as well as provide their employees and contractors with a safe workplace that is free of harassment, intimidation, bias, and unlawful discrimination
- Ensure all of their records, documents and communications concerning conducting business with or on behalf of Rocket Software are truthful, complete, and accurate (in accordance with [Section IV](#)) and that they have the legal right to provide Rocket Software with any software or other materials they make available to Rocket Software as part of their engagement with Rocket Software
- Conduct their business and interactions with Rocket Software fairly and honestly and in compliance with applicable antitrust and competition laws, export compliance laws and anti-bribery and anti-corruption laws throughout the world, including the U.S. Foreign Corrupt Practices Act of 1977 and the U.K. Bribery Act 2010 (in accordance with [Section V](#))
- Never offer or accept gifts, entertainment, or other business courtesies that could create the appearance of a conflict of interest or have the potential to violate bribery laws in connection with Rocket Software's business
- Protect Rocket Software assets and keep Rocket Software confidential information, including intellectual property and personal data, confidential (in accordance with [Section VI](#))
- Cooperate with our reasonable requests for information, certifications, and/or audit access

At Rocket Software, the way we conduct business is as important as the products and services we provide. In the event we determine that a partner or supplier's efforts to comply with this Code have been deficient and the partner or supplier fails to cooperate in developing and implementing reasonable remedial steps, Rocket Software reserves the right to take appropriate actions up to, and including, discontinuing working with the partner or supplier or report the conduct to appropriate authorities. Nothing in this Code is intended to, in any way, grant any additional rights or expectations to a Rocket Software partner or supplier or, in any way, modify or otherwise limit any of Rocket Software's contractual or legal rights.

If one of our partners or suppliers sees or suspects any conduct or business practices that it suspects could violate this Code, they must contact Rocket Software immediately (see [Section IX](#) below for how to report a suspected violation).

IX. Additional Guidance and Reporting Concerns

If you have any questions about the concepts discussed in this Code or need further guidance, we encourage you to speak with your manager, your People Business Partner, or our Chief Legal Officer.

Any suspected violation of this Code must be reported to Rocket Software immediately. We encourage you to report violations of this Code to your manager, your People Business Partner, or our Chief Legal Officer. You can also report violations via our third-party reporting portal, Speak Up. Speak Up also provides an anonymous reporting option if you feel more comfortable reporting anonymously (visit www.rocketsoftware.ethicspoint.com to use this third-party option).

Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action. Rocket Software will not retaliate — and will not tolerate any kind of retaliation — for reporting a concern in good faith. Information will be shared only with those who have a need to know, such as those involved in answering your questions or investigating and addressing issues you raise.

A violation of this Code can lead to severe civil and criminal penalties and reputational harm to Rocket Software. Rocketeers that violate these laws can also face severe civil and criminal penalties, including jail time. Your failure to comply with this Code and other Rocket Software policies and procedures (including training requirements) could also result in disciplinary actions including termination of employment or other contractual relationships.

Failure to report a suspected violation of this Code constitutes an independent violation of this Code that is subject to discipline, up to and including termination of employment or contractual relationship.

About Rocket Software

Rocket Software partners with the largest Fortune 1000 organizations to solve their most complex IT challenges across Applications, Data, and Infrastructure. Rocket Software brings customers from where they are in their modernization journey to where they want to be by architecting innovative solutions that deliver next-generation experiences. Over 10 million global IT and business professionals trust Rocket Software to deliver solutions that improve responsiveness to change and optimize workloads. Rocket Software enables organizations to modernize in place with a hybrid cloud strategy to protect investment, decrease risk, and reduce time to value. Rocket Software is a privately held U.S. corporation headquartered in the Boston area with centers of excellence strategically located throughout North America, Europe, Asia, and Australia. Rocket Software is a portfolio company of Bain Capital Private Equity. Follow Rocket Software on [LinkedIn](#) and [Twitter](#).

The future won't wait—modernize today.

Visit RocketSoftware.com >



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