



Global Supplier Code of Conduct

EFFECTIVE DATE: JUNE 1, 2024

Introduction

Workhuman conducts its business in strict compliance with the letter and spirit of the law and adheres to the highest principles of business ethics and integrity. Accordingly, everyone acting on Workhuman's behalf, including third-party suppliers who partner with us throughout our value chain, must exercise reasonable judgment and avoid activities which are in conflict, or give the appearance of being in conflict, with these principles.

Our **Global Supplier Code of Conduct** ("Code") is designed to serve as a guide to the ethical conduct standards Workhuman expects from our suppliers. As used within this Code, the term "suppliers" applies to any providers of goods and services throughout Workhuman's value chain, including your employees and any of your subcontractors or sub-tier suppliers and their respective personnel. Workhuman's Global Supplier Code of Conduct is aligned to the values, principles, and policies of our Global Code of Conduct and Ethical Behavior, which is the cornerstone of our culture of ethical conduct and system of internal controls. This Code should be read in conjunction with the terms and conditions of your agreement that governs the relationship with Workhuman ("Agreement"); in the event of a conflict between this Code and your Agreement, the Agreement will govern unless otherwise expressly provided in the Agreement or where required by law.

Our suppliers play a key role in helping to build the trust and positive reputation of our brand as we provide products and services to customers and users throughout the world. As such, Workhuman expects our suppliers to share our commitments to ethics and integrity and compliance with laws and regulations which apply wherever you provide products and services to or for Workhuman. We expect our suppliers to regularly review and comply with this Code and communicate the Code's expectations to your employees and value chain partners who you engage with that support Workhuman. Workhuman expects suppliers to notify us of any actual or suspected violations of this Code as well as actual or suspected violations of laws, regulations, or other rules of conduct by any person (including your value chain partners) in the provision of goods and services to or for Workhuman.

About Workhuman

Workhuman provides the industry's best-in-class Social Recognition® solution, powering peer-to-peer employee recognition that fuels culture, engagement, and productivity. We empower HR and business leaders with actionable insights and innovative technology to help them make the right decisions to align business objectives and culture to deliver immediate impact. We are committed to building more connected human-centered workplaces that provide measurable value and build a culture that inspires.

Ethical Business Practices

CONFLICTS OF INTEREST

Conflicts of interest may arise in many situations when a supplier's interest interferes with Workhuman's business interests. Suppliers are obligated to disclose all **actual, potential, or perceived** conflicts of interest, whether due to a business or personal relationship between the supplier (including its employees, customers, suppliers, or other business partners) and Workhuman employees, officers, or directors.

Workhuman may decline to engage in a prospective supplier relationship due to conflicts of interest, and may require modification of existing supplier relationships due to reasons including, but not limited to, Workhuman employees with a conflict of interest being placed in a position to supervise the delivery of products and services; approve financial transactions with a supplier; holding a material financial interest in a supplier; or exercise decision-making control over a business relationship with Workhuman.

FAIR COMPETITION

Vigorous but lawful competition and establishing fair, mutually beneficial business relationships with customers and suppliers is part of our long-term foundation for success. Suppliers are expected to compete fairly and comply with the antitrust, unfair competition, and related trade laws and regulations of all countries where Workhuman conducts business. No one acting on behalf of Workhuman should take unfair advantage of another person in our business dealings, including misusing or abusing confidential or material non-public information, and manipulating, concealing, or misrepresenting material facts about any aspect of our business, products, services, or competitors.

ANTICORRUPTION AND INTERACTIONS WITH GOVERNMENT OFFICIALS

All suppliers are expected to understand and comply with anticorruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act 2020, Ireland's Criminal Justice (Corruption Offences) Act 2018, and other applicable laws and regulations (including but not limited to laws governing business courtesies, government acquisitions, and lobbying), as well as Workhuman's Anticorruption Policy (available through our Partner Policies web page).

Suppliers and their employees acting on Workhuman's behalf are prohibited from offering, promising, paying, or authorizing payments of anything of value to any government official (including employees of government-owned entities, public international organizations, political parties, and candidates for public office) to influence or reward any act of such official, or to any other person or entity if such payments would violate the laws of the U.S. or any other country in which Workhuman or the supplier conducts business. There is no minimum threshold of nominal value for these prohibited activities – any offer or payment of money, gifts, meals, entertainment, travel expenses, benefits, or any other thing of value to a government official can constitute a violation of anticorruption laws and regulations.

In order to demonstrate compliance with our anticorruption policies, suppliers are expected to maintain an anticorruption policy and implement internal controls which are designed to prevent and detect corrupt payments. Suppliers are expected to provide regular training to their staff on anticorruption and prohibited payments. All books, records, accounts, and transactions relating to business with Workhuman must be recorded in reasonable detail to fairly and accurately document all transactions, receipts and expenditures relating to goods and services provided to Workhuman. Workhuman has zero tolerance for any attempt to create false or misleading documentation or records for any transaction relating to business with Workhuman.

HUMAN RIGHTS AND FAIR LABOR PRACTICES

All suppliers have a responsibility to support Workhuman's commitment to human rights in our workplace and the dignity of all persons working on our behalf in any capacity throughout our value chain. This includes compliance with our Human Rights Policy (available through our Partner Policies web page) and obligations under the UK Modern Slavery Act 2015 and other applicable laws and regulations where Workhuman and our suppliers conduct business. We are strongly committed to preventing the use of forced or compulsory labor of all types, preventing the use of child labor, and ensuring all employment relationships (including those within our third-party suppliers) are entered into freely and voluntarily. We expect suppliers to maintain a current policy addressing human rights compliance, conduct regular, reasonable due diligence of their value chains and conduct regular training of their staff on human rights topics to ensure compliance with our Human Rights Policy and applicable laws and regulations.

Suppliers must comply with applicable laws and regulations relating to fair labor practices, including but not limited to wage and hour compliance, overtime pay, workplace safety, and workers' rights to freedom of association and collective bargaining. Workhuman has committed to providing equal pay for work of similar value, regardless of personal characteristics, and expects suppliers to undertake similar steps.

FINANCIAL CRIMES COMPLIANCE

All suppliers are expected to comply with financial crimes laws and regulations applicable to Workhuman's business and the products and services you provide to Workhuman. These include, but are not limited to, laws relating to anti-money laundering (AML) and terrorist financing, economic sanctions (including programs administered by the U.S. Office of Foreign Assets Control (OFAC)), trade restrictions, and criminal facilitation of tax evasion. Suppliers must not engage in, support, or facilitate any such activities and are expected to report to Workhuman concerns about actual or suspected financial crimes activity involving products and services provided to or for Workhuman as soon as it is identified.

NON-DISCRIMINATION AND ANTI-HARASSMENT

Workhuman is committed to the principles of equal employment opportunities for all and providing a work environment free of discrimination. Our suppliers are expected to evaluate applicants for employment and employees on their individual qualifications for a position and under no circumstances discriminate against qualified persons on the basis of any personal characteristics protected by applicable laws and regulations in the countries where Workhuman or our suppliers operate. We believe all individuals should be treated fairly throughout the recruitment, selection, and employment process and we work to ensure no individual experiences discrimination through either conscious or unconscious action or bias.

We are dedicated to promoting a professional, respectful, and supportive workplace free from any type of harassment (including sexual harassment), bullying, and other unwelcome behavior. Our suppliers are expected to implement and promote measures to protect the dignity of our employees and encourage respect for all in our workplace. We expect that all interactions between suppliers and either Workhuman employees or customers will be business-like and free of bias, prejudice, harassment, bullying, and any other abusive, inappropriate or unwelcome conduct toward any anyone. We take a zero-tolerance approach toward such inappropriate conduct and expect all suppliers conducting business with us to understand how to identify such conduct and raise concerns about inappropriate behavior they experience or witness.

Building Sustainable Partnerships

SUPPLIER DIVERSITY

As part of our long-term supplier diversity strategy, we are investing in our program governance and actively working to increase the number of women-owned and diverse-owned businesses in our supplier networks. We believe it is important that that our suppliers share our values and strive to make their representation more reflective of the world's diversity. As part of our supplier diversity program, we will request information about whether your organization meets definitions of diverse suppliers in our operating locations, and may periodically request additional voluntary reporting regarding your diversity objectives, goals, and progress.

ENVIRONMENTAL SUSTAINABILITY

As a company built around redefining humans' relationships with work, we're committed to advancing and modeling sustainable practices in the workplace by achieving carbon neutrality while promoting a less impactful, more ethical relationship between our business practices and our environment. As part of our environmental sustainability program implementation, we are reviewing all aspects of our business operations to strive for continuous improvements to reduce our environmental impact and prioritizing partnerships with suppliers that share our objectives and goals. Our suppliers play a key role in furthering our sustainability goals as we continually evaluate the impact of and goals relating to our indirect emissions footprint. As part of our sustainability program, we will request periodic voluntary reporting relating to the greenhouse gas emissions and resource use from your direct operations as well as those which relate to the goods and services Workhuman purchases from you.

Confidentiality and Information Security

CONFIDENTIAL INFORMATION

Confidential information gathered and generated in our business plays a vital role in Workhuman's ability to compete, our continued growth prospects, and the success of our ongoing business. Confidential information includes, but is not limited to, all non-public information that might be useful to competitors or harmful to Workhuman or our customers if disclosed. We expect suppliers who access Workhuman confidential information in providing goods and services to or for us will hold such information in the strictest confidence and use it only for fulfilling contractual obligations to Workhuman. Confidential information may not be disclosed without Workhuman's written authorization unless required by applicable laws, regulations, or legal proceedings.

Certain Workhuman confidential information as well as information learned about other companies with which Workhuman does business may constitute **insider information** as it is defined within the scope of U.S. and other securities laws and regulations. Third parties with access to Workhuman insider information shall not disclose any such insider information to anyone in violation of securities laws and regulations or use such insider information in any way to trade in securities or otherwise gain profit.

INFORMATION SECURITY, DATA PROTECTION AND ACCEPTABLE USE

Information security is the responsibility of every person who is granted access to Workhuman's information systems. The loss, theft, and misuse of Workhuman's physical assets, information systems, and intellectual property has a direct adverse impact on our business and profitability. Suppliers who access Workhuman's IT services in the performance of their contract obligations are required to abide by the terms and conditions of Workhuman's Acceptable Use Policy (provided to all third party users of our IT services) and **are expected to utilize good judgment in all uses and activities**. Users of Workhuman's IT services can have no expectation of privacy, and Workhuman, as it may deem appropriate, reserves the right at all times to access, monitor, review, copy, or delete any information stored or transmitted on any of our IT services.

All individuals entrusted with Workhuman confidential information are expected to protect Workhuman assets, Workhuman information systems, and intellectual property and ensure these are used only for legitimate Workhuman business purposes and in accordance with the Agreement. These responsibilities extend to maintaining Workhuman's compliance with all information security and data privacy related laws and regulations, including but not limited to the EU General Data Protection Regulation (EU GDPR), the UK GDPR, and applicable laws within the U.S. and Canada.

PUBLICITY

Suppliers may not use Workhuman's name, logo, or any other proprietary marks or share the existence of supplier's business relationship with Workhuman for any purpose without Workhuman's prior written consent.

BACKGROUND SCREENING

Suppliers whose personnel support the provision of services to Workhuman or to our customers are expected to perform reasonable background screening of such personnel prior to commencement of services and on an ongoing basis thereafter. Background screening procedures should validate information including, but not limited to, criminal background, employment history, educational history, sanctions screening, Politically Exposed Persons (PEP) screening, and work authorization.

Reporting Channels

We have always believed in the importance of open, honest, respectful communication. Workhuman has implemented confidential reporting channels which our suppliers may utilize to proactively ask questions, seek guidance, and report suspected violations of this Code as well as actual or suspected violations of laws, regulations, or other rules in the conduct of business on Workhuman's behalf or for Workhuman's benefit by any person. Workhuman will use reasonable efforts to protect the confidentiality of individuals raising questions and concerns, subject to applicable laws, regulations, and/or legal proceedings. While you may submit anonymous reports, we encourage you to provide as much detail as possible to allow the Company to thoroughly and objectively investigate and evaluate the subject matter of your report.

Questions and concerns may be submitted via email to **EthicsReporting@workhuman.com** (anonymity cannot be maintained), by voicemail to **+1 508 486 4600 (North America)** or **+353 1 9685849 (EMEA)** (anonymous reports can be submitted), or by mail to 100 Staples Drive, Framingham, MA, U.S.A. 01702, Attn: General Counsel (anonymous reports can be submitted).

Workhuman expressly forbids retaliation against anyone acting in good faith on the basis of a reasonable belief when reporting suspected misconduct or other questions or concerns relating to this Code; we expect suppliers not to engage in retaliation against any personnel utilizing our confidential reporting channels for these purposes.

Workhuman follows and expects our suppliers to follow the requirements of U.S. securities laws and regulations, the EU Whistleblower Directive (and implementing national legislation) and other applicable laws where we do business, prohibiting companies from taking retaliatory action against employees who take certain lawful actions when they suspect wrongdoing on the part of their employer, known as "protected disclosures," including providing information to or otherwise participating in or assisting a regulatory or law enforcement or similar investigation conduct that the employee reasonably believes constitutes a violation of securities laws and regulations, antifraud and anticorruption laws and regulations, environmental offenses, or other criminal offenses within the scope of such whistleblower protection laws.

COMPLIANCE WITH THIS CODE

Suppliers are expected to cooperate with Workhuman's periodic requests for documents and/or information made in connection with Workhuman's supplier onboarding and ongoing due diligence processes. Suppliers are obligated to provide truthful and accurate responses to such requests for information and Workhuman reserves the right to request additional information at any time. Workhuman reserves the right to require a corrective action plan and/or terminate its relationship with a supplier due to any discovered violations or non-compliance with this Code.

UPDATES TO THIS CODE

Workhuman reserves the right to make changes or updates to this Code at any time. Workhuman will post the updated version at the following link: <https://www.workhuman.com/workhuman-partner-policies/>.