

Third Party Code of Conduct Workato, Inc.



March 2023

Workato, Inc. and its subsidiaries (collectively, “Workato” or “we”) operate a global business, and Workato is committed to upholding the highest standards of human rights, integrity, sustainability and ethical conduct. Workato requires all entities (including their employees and contractors) or individuals that work for or with Workato or provide goods or services to Workato, including our suppliers, partners, resellers, referrers, vendors, contractors, consultants, and other third-party providers (collectively, “Suppliers” or “you”) to operate with integrity as we do at Workato. This Third Party Code of Conduct (“Code”) is designed to document the minimum requirements of being a Workato Supplier.

1. Ethics and Integrity

a. Ethics

Suppliers should operate with high ethical standards and integrity. This includes but is not limited to avoiding all forms of bribery, abuse of power, corruption, theft, suppression, etc. Further, Suppliers must conduct business in compliance with all applicable antitrust and fair competition laws, and must not exchange current, recent, or future pricing information with competitors or other third parties. We ask that any actual or suspected violators or violations be reported to Workato immediately.

b. Conflict of Interest

Suppliers shall not engage in any financial or other activity with an employee or representative of Workato that creates or could be reasonably perceived to create a conflict of interest for Workato in its relationship with the Suppliers. All transactions and relationships that could reasonably be perceived to create a conflict of interest must be disclosed and approved in writing by Workato, including, but not limited to, any personal, professional, or familial relationship between Supplier’s employees, directors, or officers and any of Workato’s employees, directors or officers.

c. Trade Sanctions and Export Control Laws

Suppliers must comply with all applicable export controls and sanctions laws and regulations of the United States and other jurisdictions, including anti-boycott laws, International Traffic in Arms Regulations, Export Administration Regulations, and country-specific sanctions administered by the U.S. Department of the Treasury's Office of Foreign Asset Controls. As a U.S.-based company, Workato is forbidden from doing business or providing access to its products, directly or indirectly, to persons located or based in jurisdictions subject to U.S. sanctions. Suppliers shall not, directly or indirectly, conduct their business in a U.S.-embargoed country or region, or for any prohibited end use (e.g., nuclear, chemical, or biological weapons proliferation, or missile-development purposes). Suppliers shall not conduct any action that would cause themselves or Workato in violation of these applicable export controls and sanctions laws.

d. Anti-Corruption

Suppliers must abide by all applicable anti-corruption or anti-bribery laws, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act 2010. These laws generally prohibit both bribery of government officials and private sector (commercial) bribery. Suppliers shall not offer any payment or give anything of value that constitutes any illegal or improper bribe, kickback, payment, gift or thing of value. In addition, the FCPA mandates that companies establish and maintain accurate books and records and adequate internal controls.

2. Social Responsibility and Environment

a. Labor Laws and Human Rights

Suppliers are prohibited from requiring employees to work more than the maximum hours, and shall pay at least the applicable minimum wage and overtime pay in compliance with local and national laws and international standards. Workato supports the elimination of modern

slavery and human trafficking. We will not tolerate any human rights abuses or offenses by our Suppliers or their affiliates, employees, agents or subcontractors. All Suppliers must, at minimum, follow applicable laws and regulations (including the UK Modern Slavery Act of 2015) concerning human trafficking, child labor, forced or compulsory labor and involuntary prison labor. Further, all Suppliers must regularly review their employment practices and perform due diligence to ensure against modern slavery and human trafficking in their supply chains.

b. Health and Safety

Suppliers must ensure that all of their employees are working in a healthy and safe environment, including complying with all applicable health and safety laws. Suppliers must ensure that all their employees are safe from physical, verbal, sexual, and psychological harassment and disciplinary measures should be put in place for any violators.

c. Freedom of Association and Collective Bargaining

Suppliers must respect their employees' rights to freedom of association, collective bargaining, and seeking representation in accordance with applicable local laws and regulations governing the legal rights of their employees to join or not to join worker organizations, including trade unions, as well as international standards. Suppliers are expected to permit employees to openly communicate about working conditions without intimidation, reprisal or harassment.

d. Fair Treatment, Non-Discrimination, Diversity and Inclusion

We do not condone harassment, discrimination or retaliation of any kind and will not conduct business with any Supplier that does not hold the same value of acceptance and inclusion for all. Suppliers must provide equal opportunity in the workplace and reasonable accommodation, and not engage in harassment or discrimination on

the basis of ethnicity, race, color, gender identity or expression, sexual orientation, religion, age, pregnancy, political opinion, medical condition, citizenship, immigration status, union membership, protected veteran status, or any other characteristic protected by applicable local laws, regulations, and ordinances. Suppliers will not subject workers or potential workers to unlawful medical tests or physical exams.

We are committed to improving our diversity and inclusion strategy and policy at Workato and encourage our Suppliers to do the same. Workato encourages including diverse Suppliers in sourcing events such as women-owned, minority-owned, LGBTQ-owned, veteran-owned businesses, etc. to promote inclusion and fair business practices. We encourage our Suppliers to have a Diversity and Inclusion program.

e. Environment

Workato is committed to respecting and protecting our environment and promoting environmental sustainability, and expects Suppliers to be environmentally responsible. At a minimum, we require adherence to all applicable environmental laws, regulations, permits, licenses, standards and international treaties. We encourage Suppliers to have an environmental management system and to take proactive steps to improve and protect the environment. Suppliers should be mindful and responsible in their business practices that may affect the environment. This includes conserving natural resources, reducing greenhouse gas emissions, minimizing waste, promoting recycling and reuse, and avoiding use of toxic and hazardous materials.

3. Use of Workato Logo and Intellectual Property

Unless expressly authorized by Workato, Suppliers may not use, display, or reproduce Workato's logo, name, images, trademarks, patents, copyrights or other intellectual property owned by Workato. Supplier agrees to promptly remove displays of the Workato logo, name, images, trademarks or other

intellectual property upon Workato's written request or upon termination or expiration of its relationship with Workato, unless otherwise authorized by Workato in writing. Suppliers shall respect and protect the intellectual property rights of all parties by only using information, content, technology, software or other intellectual property that has been authorized or licensed in accordance with applicable licensing terms.

4. Confidentiality and Data Protection

Suppliers shall safeguard and protect the privacy and confidentiality of all personal information, confidential and proprietary information, as well as take proactive measures to prevent any unauthorized and unlawful use, disclosure, access, loss, alteration, damage and destruction of such information. Suppliers shall use and disclose personal information, confidential and proprietary information only as authorized by Workato and as required by applicable laws and regulations. Suppliers shall also provide clear and accurate privacy notices when collecting or processing personal information, protect personal information, respect the privacy choices of data subjects, and use personal information in accordance with applicable privacy and data protection laws.

We expect each Supplier to take reasonable measures to ensure that its officers, employees, and other representatives comply with insider trading laws and regulations and its own internal policies.

5. Security

Suppliers shall use security measures in compliance with security standards, policies, controls, privacy rules and regulations, and other requirements of Workato, including information security program, security controls, network controls, access credentials, and business continuity.

Supplier shall:

- implement a documented business continuity program to ensure maintenance of emergency response and disaster recovery plan to

protect data, information, materials and the business continuity of its services and products;

- maintain an effective quality management system, which includes continual improvement in accordance with Workato's requirements.
- develop and document information security requirements for mitigating the risks associated with Supplier's access to Workato's or its customers' assets;
- be responsible for developing and implementing security policies and procedures to safeguard physical and electronic assets, confidential information sensitive data and personal data from unauthorized access, damage, use, modification, disclosure or impairment, as specified by Workato and applicable laws and regulations; and
- implement controls for necessary transactions of information, information processing facilities and anything else that needs to be moved and ensure that information security is maintained throughout the transition period.

6. Community Support; Communication

Workato seeks to work with Suppliers who share our commitment to social impact and economic development in our local communities. We strongly encourage suppliers to engage with and contribute to the communities in which they operate. Suppliers shall not post any material or make any statement that is disrespectful, harmful, unprofessional, harassing, defamatory and discriminatory to Workato or its employees and customers. Suppliers shall not act or make any representation or commitment on behalf of Workato or express any views attributable to Workato without prior written authorization.

7. Workato Code of Conduct

For additional information regarding Workato's Code of Conduct (which is applicable to all our officers, directors and employees), please email legal@workato.com.

8. Compliance; Reporting Concerns

We expect all our Suppliers to adhere to this Code and maintain a record of compliance with this Code. We reserve the right to request documentation of compliance with this Code of Conduct at any time. We also expect all our Suppliers to provide reasonable assistance to any investigation by Workato of a violation of this Code.

We count on our Suppliers to help our business succeed and to uphold our values and culture of integrity. If you believe that a Workato employee or anyone acting on behalf of Workato has engaged in illegal or unethical behavior or not in compliance with this Code, please report your concerns to the following:

- Send an email or letter to us at legal@workato.com or Attn: Legal Department, 215 Castro St., Unit 300, Mountain View, CA 94041, United States.