

## Workato, Inc.

### Third Party Code of Conduct

Workato, Inc. and its affiliates and subsidiaries (“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 (“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 conducting business with Workato.

#### 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, fraud, extortion, abuse of power, corruption, theft, suppression or other unfair or unethical business practices or actions. 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, or disparage, defame, libel or slander Workato and its related parties in any manner likely to be harmful to Workato or the related parties (including our partners, customers or prospects), the services provided by Workato, and its business reputations and goodwill.

##### b. Conflict of Interest

Suppliers shall not engage in any financial or other activity that creates or could be reasonably perceived to create a conflict of interest for Workato, Supplier, or other related parties (including our partners, customers or prospects). 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 any personal, professional, or familial relationship between employees, directors, officers or the related parties between Suppliers and Workato.

##### c. Anti-Corruption and Anti-Bribery

Suppliers must abide by all applicable anti-corruption, anti-bribery, and anti-money laundering laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010, and must not violate, or cause Workato or its related parties to violate these laws. Suppliers shall not offer, give or receive any illegal or improper bribe, kickback, payment, gift or thing of value such as hospitality and other benefits. In addition, Suppliers must establish and maintain complete and accurate books and records and adequate internal controls in accordance with generally accepted accounting principles. Suppliers are also expected to prevent any attempt to use Suppliers’ and Workato’s business as a means to launder illicit money or finance terrorist activities.

##### d. 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. Suppliers shall not, directly or indirectly, conduct their business in a U.S.-embargoed or sanctioned 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.

## 2. Labor Practices and Human Rights

### a. Working Hours, Wages, and Benefits

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

### b. Human Rights and Modern Slavery

Workato supports the elimination of modern slavery, child labor, 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 and Australian Modern Slavery Act 2018 (Cth)) 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 and should only use recruiters and agencies that comply with local labor laws and are certified or licensed by the authorities.

### c. Health and Safety

Suppliers must ensure that all of their employees and contractors are working in a healthy and safe environment, including complying with all applicable health and safety laws, regulations, and standards. Suppliers are expected to have processes and policies to prevent and minimize occupational health and safety hazards, provide job-related training, and mitigate health and safety risks in the workplace. Suppliers must ensure that all their employees and contractors in their supply chain are safe from physical, verbal, sexual, and psychological harassment and disciplinary measures should be put in place for any violators.

### d. 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 and directly communicate about working conditions without intimidation, reprisal or harassment.

### e. 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, culture, age, pregnancy, political opinion, medical condition, disability, citizenship, immigration status, union membership, protected veteran status, genetic information, 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.

### **3. 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 (including their supply chain) that may affect the environment. This includes conserving natural resources, managing wastewater discharges, air emissions and waste, promoting recycling and reuse, and avoiding use of toxic and hazardous materials.

### **4. Use of Intellectual Property**

Unless expressly authorized by Workato in writing, Suppliers may not use, display, or reproduce the logo, name, images, trademarks, patents, copyrights or other intellectual property owned by Workato or its licensors. Supplier agrees to promptly remove and return the intellectual property upon Workato's written request or upon termination or expiration of its relationship with Workato. 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.

### **5. Confidentiality and Data Protection**

Suppliers shall safeguard and protect the privacy and confidentiality of all confidential, customer data, personal information and proprietary information and assets, 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, using, storing 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, contractors and other representatives comply with insider trading laws and regulations and its own internal policies.

Suppliers are also expected to fully cooperate with the investigation and inquires of government agencies as require by applicable laws, and to the extent legally permissible, promptly notify Workato of such investigation and inquires relating Workato's business, operations or information.

### **6. 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. Specifically, 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.

### **7. 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.

### **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 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 an employee or anyone acting on behalf of Workato or Supplier has engaged in illegal or unethical behavior or not in compliance with this Code, or if you have any question regarding this Code, please reach out to the following:

- Send an email or letter to us at [legal@workato.com](mailto:legal@workato.com) or Attn: Legal Department, 1530 Page Mill Road, Suite 100, Palo Alto, CA 94304, United States.