

GUIDEWIRE SOFTWARE, INC.  
SUPPLIER CODE OF CONDUCT

At Guidewire Software, Inc. (“**Guidewire**”), we practice our core values of service, loyalty, honesty, and integrity. These values ensure that we conduct ourselves with the utmost integrity, delivering high quality software products and services while following all applicable laws, regulations, and standards of business conduct, while avoiding even the appearance of impropriety. Guidewire will use the following standards in selecting suppliers, vendors, contractors, consultants, agents, and other providers of products and services (“**Suppliers**”) and will require them to comply with this Supplier Code of Conduct (“**Code**”) and to ensure that their respective subcontractors and vendors (i.e., Suppliers’ suppliers) comply. We are committed to meeting those expectations, and we in turn expect our Suppliers to adhere to the highest standards of ethical conduct.

Suppliers are expected to establish policies and procedures to follow this Code, which may be verified upon Guidewire’s request. Suppliers must respond to all mandatory requests from Guidewire in a timely manner, including questionnaires about suppliers’ policies and practices. Unless as otherwise agreed by the parties, Guidewire reserves the right to audit or inspect Suppliers’ records and facilities as applicable and permitted by law.

Guidewire reserves the right to terminate our relationship with any Suppliers, who do not comply with this Code unless conflicting terms exist in an agreement between Guidewire and Supplier which will take precedent over this Code.

Nothing in this Code is meant to supersede any specific provisions that may exist in a given contract.

**Business Ethics**

**Fair Competition and Anti-Trust:** Suppliers are required to conduct business in accordance with all applicable anti-trust or anticompetition laws and regulations.

**Export/Import Control:** Suppliers must ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components and related technical data.

**Anti-Corruption and Anti-Bribery:** Suppliers are required to refrain from any and all forms of illegal or improper activities including corruption, misrepresentation, extortion, embezzlement, bribery, or insider trading. Suppliers, contractors, and vendors must perform in compliance with all applicable local, state, federal, and international laws and regulations, including, the U.S. Foreign Corrupt Practices Act of 1977 and the U.K. Bribery Act of 2010.

**Employment Practices**

**Forced Labor and Modern Slavery:** Suppliers’ employees (including temporary workers, migrant workers, students, contract workers, and direct employees) are expected to not be forced, bonded, indentured, trafficked, or subjected to involuntary prison, labor, or modern slavery. Suppliers agree that they will not take any actions in violation of the foregoing, including transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. All work performed by Suppliers must be voluntary, and its workers shall be free to terminate their employment and leave work at any time.

**Child Labor:** Suppliers must not use child labor. No worker shall be employed under the age of 15 or the age at which compulsory schooling ends in the country, whichever is greater in accordance with the International Labor Organization (ILO) guidance (under Convention 138). In addition, Suppliers must comply with all local legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, and working conditions.

**Freedom of Association and Expression:** Suppliers shall permit employees' right to freedom of expression and freedom of association and collective bargaining in accordance with all applicable laws and regulations.

**Non-Discrimination:** Suppliers are required to comply with all applicable laws concerning discrimination in hiring and employment practices.

**Harassment:** Suppliers are required to provide an inclusive and supportive working environment, free of harassment, bullying, and discrimination, in which all employees are valued and empowered to succeed. Employees must be able to report a concern in good faith without retaliation from management. Suppliers must not use corporal punishment or other mental or physical disciplinary actions or engage in sexual harassment.

**Compensation and Working Hours:** Suppliers must provide compensation in compliance with all applicable wage laws. Suppliers shall not allow workers to work more than the maximum hours of daily and weekly labor set by applicable local and national laws and regulations. All overtime shall be voluntary and paid in accordance with applicable laws. Suppliers must comply with local law requirements governing maximum work hours.

### **Health and Safety**

**Working Conditions:** Suppliers are required to provide adequate and safe working conditions free of hazardous conditions and comply with applicable health and safety laws and regulations. Suppliers must have policies and procedures in place to monitor and protect employees and customers from a health and safety perspective. Suppliers are expected to have appropriate incident reporting and investigation procedures, including a process for corrective action, which may be verified upon Guidewire's request.

### **Environmental Protection**

**Environment:** Suppliers must comply with all applicable environmental laws and regulations. Suppliers are encouraged to demonstrate an active environmental sustainability policy and program to address greenhouse gas emissions and any other material environmental impacts arising from their operations, products, and supply chain. Guidewire gives preference to suppliers and vendors that publicly disclose their greenhouse gas emissions and have set or are committed to setting a science-based greenhouse gas target.

### **Ethical Conduct**

**Conflicts of Interest:** Suppliers must avoid actual and potential conflicts of interest — those circumstances in which their personal interests influence or appear to influence their ability to act in the best interest of Guidewire. We expect our Suppliers to report to Guidewire any situations of potential or apparent conflicts between their personal interests and the interests of Guidewire.

**Data Security and Confidentiality:** Suppliers must take appropriate measures to ensure proper handling, discussing, storing, and transmitting confidential, proprietary, and personal information of Guidewire, its customers, employees, and other Suppliers in accordance with applicable laws and contract terms. Suppliers shall maintain privacy and security policies that meet or exceed all applicable legal and regulatory requirements and that comply with Guidewire's privacy policy available at <https://www.guidewire.com/privacy-policy/>.

**Financial Integrity:** Suppliers are required to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, time entry, expense reports, payroll records, resumes and submissions to Guidewire.

**Entertainment, Favors, and Gifts:** In any business relationship, Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, does not violate the rules and standards of the recipient's organization, is consistent with reasonable marketplace customs, and will not adversely impact the reputation of Guidewire. Guidewire employees are not allowed to accept gifts, favors, or entertainment intended to improperly influence, or could be perceived to improperly influence, their judgment or performance as a Guidewire employee. Suppliers must not offer gifts, favors, or entertainment to Guidewire employees that would violate this policy.

**Grievance Mechanism:** Suppliers are required to have a formal complaint process (grievance mechanism) available to individuals, employees, and other stakeholders to raise any concerns arising from your business activities and operations, and such activities from your suppliers, without fear of retaliation. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned. The mechanism should also allow for confidential complaints to be raised and addressed.

**Conflict Minerals:** We expect all Suppliers to have controls and policies in place to ensure that they are in compliance with all applicable laws and regulations regarding the sourcing of conflict minerals (e.g., tin, tantalum, tungsten, and gold). Suppliers must provide Guidewire with evidence of compliance upon request. If you believe conflict minerals are contained within products supplied to Guidewire, you must conduct proper due diligence within your supply chain to determine the origin of conflict minerals and disclose your findings upon request.

### **Commitment to Diversity, Equity, and Inclusion**

**Diversity, Equity, and Inclusion:** Suppliers are encouraged to demonstrate a commitment to incorporate a culture of diversity and inclusion throughout the workplace and supplier management, including small and diverse suppliers and subcontractors where possible. Guidewire encourages suppliers and vendors to engage with their local communities to contribute to opportunities to drive positive social change.

### **Executive and Board Management**

We communicate our supplier sustainability program to Guidewire leadership, including reporting to the Nominating and Corporate Governance Committee of our Board of Directors, CEO, and the internal ESG Task Force. The implementation of this Code is overseen by the ESG Task Force. The ESG Task Force is a cross-functional team comprised of senior leaders who represent corporate centers and lines of business with lines of sight to environment, social, and governance issues. Board-level oversight of this Code is provided by the Nominating and Corporate Governance Committee. Guidewire's Head of ESG is responsible for annually reviewing and updating this Code.

### **Reporting Concerns**

Suppliers are encouraged to raise any concerns or report suspected misconduct, ethics violations, or non-compliance with this Code to Guidewire by contacting Guidewire's Legal Department at [generalcounsel@guidewire.com](mailto:generalcounsel@guidewire.com). These reports may be done anonymously.