



Cincom Systems, Inc. Code of Conduct



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Letter from the President and CEO

For over five decades, Cincom Systems has been conducting business on five continents and serving customers that represent a multitude of industries in 67 countries. This industry tenure and global perspective has provided Cincom with an ever-evolving awareness and sensitivity regarding the need for both commitment and appropriate action to address humanitarian, social, financial, and environmental needs to ensure our ethical and fiscal contribution at large and the sustainability of our business. Cincom commits to the application of this Code of Conduct in each and every business interaction across all disciplines, roles, and geographies.

A handwritten signature in blue ink that reads "Thomas M. Nies". The signature is fluid and cursive.

Thomas M. Nies
President and CEO

Introduction

1 Cincom's Commitments and Principles

The Code of Conduct (The Code) describes the mandatory minimum requirements to be applied by Cincom when conducting business on an international basis, and is comprised of the following areas:

- Human Rights and Labor Conditions
- Environment
- Business Ethics and Anti-Corruption
- Legal Compliance

2 Scope and Applicability

During the term of agreement(s) with its customers, Cincom shall at all times comply with this Code in all countries in which it operates. Cincom will ensure that its employees, relevant affiliated companies, and subcontractors are informed about the content and comply with the requirements. Cincom will comply with all local regulations and legal practices. In cases of a conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure sustainable operations.

3 Human Rights and Labor Conditions

3.1 Non-Discrimination and Fair Opportunities

Employees will not be subject to discrimination or to physical, sexual, psychological, or verbal harassment or abuse based on gender, nationality, religion, race, age, disability, sexual orientation, pregnancy, marital status, political opinion, union membership, social or ethnic origin, or any other status protected by local law.

Cincom promotes the idea that all employees shall be treated with respect and dignity. Furthermore, Cincom promotes a culture of equal opportunities and diversity where appointments to jobs, rewards, and personal success depend on individual ability and performance. Fundamental human rights shall be known, understood, respected, and applied fairly to all employees whether temporarily or permanently hired or contracted.

3.2 Modern Slavery

Modern slavery including forced, bonded, or compulsory labor, prison labor, child slavery, deceptive recruiting, human trafficking, or any other kind of exploitation or abuse is unacceptable to Cincom. Therefore, we shall not engage in or tolerate:

- Confiscation of identity documents and/or passports
- Withholding of wages
- Abusive work conditions
- Debt bondage
- Violence
- Restrictions of movement
- Excessive recruitment fees or cash deposits

3.3 Child Labor

Child labor is unacceptable to Cincom. No one under the age of 15, or older where local law stipulates another higher minimum age, shall be employed by Cincom.

Cincom through continuous risk assessments will endeavor to prevent child labor in our operations and will ensure legal working conditions for young workers (i.e., those who are under 18 years of age).

If child labor is identified, a remediation that focuses on the best interest of the child must be carried out.

Young workers will not perform work that is mentally, physically, socially, or morally hazardous or that interferes with their mandatory schooling. Young workers will not work night shifts.

3.4 Freedom of Association and Collective Bargaining

Cincom shall support freedom of association, and all employees have the right to be, or not to be, a member of a trade union and to bargain collectively.

Cincom shall not discriminate against workers' representatives or members of trade unions who shall also have access to carry out their representative functions in the workplace.

3.5 Wages and Benefits

Cincom will pay all workers a wage that meets basic needs and provides a discretionary income in compliance with all relevant legal requirements, or with applicable collective agreements.

Employees with the same qualifications, experience and performance have the right to equal pay for equal work with respect to their relevant comparators.

Men and women will be equally remunerated. Working hours, overtime, breaks, and leaves must comply with relevant legal requirements or with applicable collective agreements. Excessive overtime must not be a norm, and overtime will be kept within local legal limits.

Employees are informed of their employment conditions, including their rights and obligations, in their native language or a language they understand via standard employment agreements.

Cincom encourages the provision of working conditions that provide a healthy work-life balance, including possibilities for caring responsibilities and recreation.

4 Health and Safety

All employees are provided with safe and healthy working conditions and environments. Employees working from home on a regular basis are provided with recommendations on ways to make their environments safe for work.

5 Environment

5.1 Environmental Management

Cincom shall always apply the precautionary principle, which means we will always take precautionary measures whenever there is reason to believe that a potential action may negatively impact the health or safety of a person, society, and the environment.

Cincom is a company that provides computer software for the commercial markets that it serves. As a supplier of software that does not have a manufacturing process that consumes energy, uses hazardous or proscribed materials, or produces waste, the number of Significant Environmental Aspects that Cincom can control and/or influence are few and have minor impact on the environment. Cincom will continue to review and monitor its policies in a continued effort to be environmentally friendly.

Electronic waste such as obsolete servers and computers will be handled without harming the environment and with respect to human rights.

Cincom shall comply with environmental legislation and applicable local regulations.

Cincom employees and contractors are made aware of Cincom's respect for the environment and are encouraged to report any issues they may find and/or make suggestions for improvement.

6 Business Ethics and Anti-Corruption

6.1 Anti-Corruption

No abuse of power, nepotism, or bribery, including improper offers of payments to or from employees or organizations, shall be tolerated. Gifts or similar benefits may only be offered to, or accepted from, a third party if modest in value and if consistent with reasonable hospitality given in the ordinary course of business.

7 Fair Competition

Cincom is firmly committed to fair competition and open markets and expects to compete as forcefully and constructively as possible while at all times complying with international and national competition law and regulations.

7.1 Trade and Sanctions Compliance

Cincom shall ensure that its business practices are in accordance with applicable regulations that govern the import/export of its deliverables. We expect our customers and suppliers to comply with local laws and international sanctions or regulations as well as provide truthful and accurate information and obtain export and import licenses and consents where necessary.

7.2 Conflict of Interest

Personal relations or considerations will never influence decision-making. Should there be any risk, however small, of a conflict of interest between the employee's duty to Cincom and their personal relations or considerations, the employee must immediately inform their manager of the conflict.

7.3 Fraud, Extortion, Money Laundering, and Other Related Crimes

Cincom abides by all applicable national and international regulations aimed at preventing, detecting, and remedying economic crime and in particular, fraud, extortion, money laundering, and other related crimes. Cincom employees will refrain from any act or omission in connection with such criminal activities and shall actively cooperate with any inquiry in relation to such crimes.

7.4 Responsible Software

Cincom develops software to be licensed by customers in the markets we serve. Cincom will endeavor to make the technology reliable and ensure that it is developed in accordance with applicable laws and regulations and with globally recognized ethics standards that address potentially adverse risks or impacts on human rights.

7.5 Security

Security and safety measures are an integral part of all services, products, and processes that Cincom provides. Therefore, all Cincom employees and contractors review and acknowledge Cincom's security policies and rules annually.

7.6 Privacy

Cincom is committed to respecting and safeguarding the privacy of everyone we interact with, including employees, customers, suppliers, business partners, and others. Any processing of personal data shall be limited in scope and duration to what is deemed necessary and in accordance with GDPR and other applicable data protection legislation. Cincom has policies and processes in place to protect any personal data from unauthorized access or unintended disclosure.

7.7 Insurance Coverage

Cincom will maintain appropriate, commercially available insurance that covers its operations, services, and products.

7.8 Political Involvement

Cincom's name or any resources controlled by Cincom shall not be used to promote the interests of political parties or candidates. Cincom will not make donations, whether in cash, kind, or by any other means to support political parties or candidates. Cincom commits that it will not use its customers', suppliers', and/or partners' names or any resource controlled by them to promote the interests of a political party or candidate.

7.9 Charitable Contributions

Cincom accepts (and indeed encourages) the act of donating to charities, whether through services, knowledge, time, or direct financial contributions.

8 Compliance

8.1 Continuous Improvement and Management Systems

Cincom has appropriate management systems to enable adherence to this Code. The functioning and quality of the management systems are in proportion to the size, complexity, and risk environment of Cincom's global operations.

8.2 Breach Reporting

Should any Cincom employee, contractor, or employee of a Cincom customer, supplier, or business partner find any suspected violation of this Code or other unethical conduct, they may confidentially report this information to the Whistleblowing process by sending an email to whistleblower@cincom.com. Whistleblowers wishing to remain anonymous may send their information to:

Cincom Systems, Inc.
Attn: Whistleblower
55 Merchant St.
Cincinnati, OH 45246

Communication and Auditing

The content of this Code shall be reviewed on an ongoing basis and updated as needed. Any requests for information concerning this Code should be directed to: governance@cincom.com.

CINCOM SYSTEMS, INC., Its Subsidiaries and Affiliates (herein "Cincom")



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