

Supplier Code of Conduct

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Statement from the President and CEO

Flexera, comprised of our Flexera and Revenera business units, is uniquely positioned to transform the relationships between the world's software producers and their customers. Our employees are passionate and possess the deep expertise necessary to help customers be successful. We are candid, passionate, and professional. We also keep score in everything we do, we celebrate success and give back to others. Flexera's solutions help application producers and enterprises manage application usage and increase the value they derive from their software. Our next- generation software licensing, compliance, security, and installation solutions are essential to ensure continuous licensing compliance, optimize software investments and future-proof businesses against the risks and costs of constantly changing technology. A marketplace leader for more than 25 years, more than 80,000 customers turn to Flexera as a trusted and neutral source of knowledge and expertise, and for the automation and intelligence designed into our products.

Our ability to fulfill our role as a socially responsible corporate citizen does not just happen; it is a result of a conscious and measured strategy for keeping ourselves and those with whom we interact accountable. This Supplier Code of Conduct helps us do just that by putting our shared values into action daily. As a supplier of Flexera, you are expected to conduct your business activities professionally and with courtesy and respect for others.

As CEO, I am committed to providing an environment that encourages ethical behavior from all of our employees, partners, and suppliers.

Thank you for your continued commitment.

Regards,

Jim Ryan

President and Chief Executive Officer

Introduction

Flexera Software LLC (collectively with its subsidiaries, “Flexera”) is committed to conducting its business in an ethical, legal, and socially responsible manner. We act with integrity and in compliance with applicable laws, regulations, and Flexera policies in all our business dealings, and we expect our Suppliers (defined below) to do the same. This Flexera Supplier Code of Conduct (“Code”) applies to Flexera suppliers and contractors and their employees, agents and subcontractors throughout the world (“Suppliers”) and outlines Flexera’s expectations and provides guidance for meeting shared business goals while transacting with transparency, honesty, trust, and social responsibility. Compliance with the Code is required to transact business with Flexera. Failure to comply with this Code may be grounds for Flexera to terminate its relationship with Supplier. Suppliers must also ensure that any subcontractors used while conducting business with Flexera follow standards that align to those reflected in this Code.

The Code is not intended to cover every issue or situation you may face as a Supplier. Nor do they replace other more detailed policies. You should use the Code as a reference guide in addition to other Flexera policies.

We reserve the right in our sole discretion to add to, modify, or eliminate any of the Code contents as and when appropriate or necessary and without prior notice. It is your responsibility as a Supplier to be fully aware of the Code and adhere to it. The most current version of the Code can be found on our website at www.flexera.com.

Compliance with Law

Suppliers must maintain awareness of and comply with applicable laws and regulations in all jurisdictions where Supplier conducts business, including but not limited to:

- All laws and regulations on bribery, corruption, money laundering, terrorist financing, and prohibited business practices, including but not limited to:
 - the Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UK Bribery Act), and other anti-corruption laws,
 - laws governing lobbying, gifts, and payments to public officials, and
 - political campaign contribution laws;
- Antitrust and fair competition laws;
- Trade controls, as well as all applicable export, re-export, and import laws and regulations;
- Laws relating to the protection of human rights and dignity; and
- Privacy and information security laws and regulatory requirements.

If a law and this Code address the same issue, the more stringent requirement shall apply to Supplier. Flexera also expects that all Suppliers maintain a written policy outlining standards of business conduct that is available to, and binding on, Supplier's employees, contractors and agents. This policy should incorporate requirements that align to and are at least as protective as this Code and applicable laws and regulations, and include effective controls, including training, monitoring, auditing and good record keeping, to prevent and detect unlawful and unethical conduct.

Ethical Business Practices

Antitrust and Fair Dealing

Flexera is committed to conducting business honestly and ethically. Flexera competes fairly and follows all applicable antitrust and competition laws and expects the same from its Suppliers. In support of this, Suppliers must not:

- Coordinate competing bids or otherwise orchestrate any bid process in the attempt to direct a contract to a particular competitor;
- Propose or agree with any competitor to fix, restrict, adjust, or control prices, margins, or contractual terms and conditions;
- Limit the production or sale of products or product lines;

- Boycott suppliers or customers;
- Divide or allocate markets, territories, or customers; or
- Otherwise discuss, plan, or arrange to unreasonably restrain competition. Supplier is expected to disclose to Flexera all actual or potential conflicts of interest.

Trade Sanctions

Suppliers may not engage in business dealings or facilitate business dealings by third parties involving countries, entities, or individuals subject to an applicable trade sanctions regime. Suppliers shall comply with all applicable trade sanctions laws, including the Office of Foreign Assets Control (“OFAC”) sanctions regulations, the Export Administration Regulations (“EAR”), the U.K. Export Control Act of 2002, and the E.U. sanctions regulations (collectively “Trade Sanctions Laws”).

Anti-Corruption and Bribery

Flexera has adopted a comprehensive Global Anti-Bribery and Anti-Corruption Policy applicable to all Suppliers and third parties acting on its behalf. All Suppliers must conduct their activities in full compliance with the Global Anti-Bribery and Anti-Corruption Policy and all applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act, and other local laws. Accordingly, Suppliers are prohibited from offering, promising, giving, soliciting, or accepting bribes or other improper benefits. A benefit may be considered improper if it is given with the intent to secure an improper advantage by inducing the recipient to act or refrain from acting. This prohibition extends to benefits given or received indirectly through third parties such as consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, and other suppliers.

Suppliers who deal with third parties are responsible for taking reasonable precautions to ensure that the third parties conduct business ethically and in accordance with Flexera policy. For more details on the prohibition, including limitations on gifts, meals/entertainment/hospitality and other guidance on third party interactions, please refer to the Global Anti-Bribery and Anti-Corruption Policy located on our website.

If you believe corrupt practices are occurring within Flexera’s supply chain, Suppliers must report such concerns to Flexera immediately.

Conflicts of Interest

Flexera is committed to conducting business with transparency. As part of that commitment, Flexera requires its Suppliers to avoid situations or relationships that involve an inappropriate conflict, or the appearance of a conflict, with the interests of Flexera. Suppliers must disclose all actual and potential conflicts of interest to Flexera using the tools described in the Reporting section, below, where

circumstances arise that could cast doubt on Supplier's ability to conduct business with Flexera with objectivity.

Record Keeping

Supplier records must be accurate, complete, and correctly reflect Supplier's transactions, business operations, and financial position. Suppliers must never knowingly make a false, misleading, or artificial entry in any such record, or provide false information or withhold information in a manner that would likely lead to a false entry. Accurate accounting of payments made by Supplier is of particular importance and implicates the Global Anti-Bribery and Anti-Corruption Policy. Suppliers with a concern regarding the accuracy of their books or records must promptly report that concern.

Suppliers must procure goods and services for Flexera in a responsible and ethical manner. Specifically, Suppliers must:

- Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy;
- Create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements; and
- Be honest, direct, and truthful in discussions with regulatory agency representatives and government officials.

Social Responsibility

Human Rights

At Flexera, we treat each other with respect, and dignity. This means that everyone is entitled to work in an environment that is free of harassment, bullying, and discrimination. Flexera expects its Suppliers to share its commitment to human rights and dignity. While working on Flexera's behalf, Suppliers must:

- Treat all individuals with respect and dignity;
- Respect and safeguard individual privacy rights;
- Prohibit violent behavior, harassment, and discrimination;
- Ensure voluntary employment and prohibit use of forced or involuntary labor of any type, including support for any form of human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercive means; and

- Not require workers to lodge “deposits” or their identity papers (government-issued identification, passports, or work permits) with their employer and make sure all workers are free to resign their employment in accordance with local and national laws or regulations without penalty.

The use of modern slavery is prohibited. Suppliers must observe and comply with international principles relating to human rights, including, but not limited to, the Trafficking Victims Protection Act, the UK Modern Slavery Act of 2015 and the Australian Modern Slavery Act 2018 (Cth).

The use of child labor is prohibited. No person under the age of 15 (or under 14 where permitted by local law) may be employed. Workers under the age of 18 may not perform work that is likely to jeopardize their health or safety.

Discrimination

Flexera promotes, and expects all Suppliers to promote, equal employment and business opportunities irrespective of race, religion, age, national origin, skin color, sex, sexual orientation, gender, gender identity, disability, pregnancy, marital status, political affiliation, and military status.

Labor and Wages

Suppliers must:

- Furnish fair compensation and comply with all applicable wage laws, including, but not limited to, those relating to minimum wages, overtime hours, maximum work hours, and all applicable regulations.
- Observe and comply with local law requirements governing maximum work hours.
- Respect employees’ right to freely associate and bargain collectively in accordance with all applicable laws and regulations.

Health and Safety

Flexera is committed to protecting the health, safety, and welfare of our employees, and to promoting a safe and productive work environment. Flexera expects Suppliers to provide workers with a safe, secure, and healthy environment in compliance with all applicable laws and regulations and implement reasonable and effective occupational health and safety measures.

Substance Abuse, Weapons and Violence

Flexera has strict standards regarding substance abuse, weapons, and violence in the workplace. Suppliers are not permitted to use or possess illegal drugs or controlled substances on Flexera property or while Supplier is engaged in any Flexera-related activity.

Suppliers may not have or possess any weapon while on Flexera property.

Violence, any threat of violence, or behavior that creates an unsafe workplace environment is prohibited.

Environment and Sustainability

Flexera recognizes its social responsibility to protect the environment. Flexera expects Suppliers, at a minimum, to comply with all applicable environmental laws, regulations, and standards. Suppliers must be able to demonstrate insight to and control over their environmental impact with an active environmental program, preferably through a certified environmental management system and active environmental policy. Suppliers who can demonstrate efforts to minimize the following will be given preference in dealings with Flexera:

- CO2 emissions in direct operations and supply chain;
- Energy consumption in direct operations and supply chain;
- Water consumption in direct operations and supply chain; and
- Waste in in direct operations and supply chain.

Suppliers must strive to demonstrate an environmental management program that addresses:

- Air quality: emission of other pollutants of any kind in direct operations and supply chain;
- Water quality: in direct operations and supply chain; and
- Chemicals management in direct operations and supply chain.

Protection of Intellectual Property and Proprietary and Confidential Information

Supplier must always protect Flexera assets, proprietary information, confidential information and intellectual property. The following are examples of information that Supplier must not use or disclose without Flexera's express written consent or authorization:

- Personal information of Flexera employees or contractors;
- Flexera intellectual property (including patents, copyrights, trademarks, and trade secrets) and Flexera technical information;
- Flexera business and marketing plans, and other internal Flexera information such as pricing, costs, terms of sale, customer lists, and other competitively sensitive information; and
- The terms and conditions of your agreement(s) with Flexera.

Flexera's information must only be shared with those individuals that need to know the information to fulfill the purpose for which Flexera engaged Supplier; those individuals may only use such information to the extent necessary for the purpose for which it was disclosed by Flexera.

Suppliers must also respect and protect the valid and legitimate intellectual property rights of Flexera and each customer including, without limitation, patent, trademark, copyright, and trade secret rights, and use those rights only in accordance with valid licenses, terms of use, or other relevant contractual provisions.

Supplier must notify Flexera immediately of any known unauthorized use, transfer or access of Flexera assets, proprietary information, patents, copyrights, trade secrets, brands, trademarks, logos, or confidential information by any third party.

Security and Data Privacy

Suppliers are expected to comply with all applicable laws and regulations related to data protection, privacy and information security. Suppliers must manage the use, retention, maintenance, access, and disclosure of confidential information or personal data provided to or by Flexera in connection with the relationship in accordance with: (i) applicable laws and regulations, and (ii) the contractual relationship with Flexera, including:

- sharing such information strictly on a need-to-know basis, and subject to appropriate safeguards;
- using such information exclusively for the purpose for which it was disclosed;
- employing appropriate technical and organizational measures to ensure protection and confidentiality of such information;
- cooperating with Flexera in respect of Flexera's legal obligations relating to such information;
- keeping records of all data processing activities; and
- properly disposing of (or returning, as appropriate) information when retention is no longer necessary or legally required.

If Supplier learns of an actual or potential data breach involving, or an unauthorized third-party's access to, Flexera information, Supplier must notify Flexera immediately and reasonably assist Flexera with (i) investigating the cause and scope of any such breach or potential breach; (ii) mitigating the impact of any such breach; and (iii) implementing improvements to ensure future breaches of a similar nature do not occur.

Reporting

Flexera relies on Suppliers to uphold our values and ethical standards globally and have created resources to help Suppliers meet that standard. If you wish to report questionable behavior or a possible violation

of this Code—whether by a Flexera employee or Supplier employee—you are encouraged to work with your primary Flexera contact to resolve your concern. If such reporting is not feasible or appropriate, please contact Flexera through the following means:

- Website: flexerasoftware@expolink.co.uk or <https://wrs.expolink.co.uk/flexerasoftware>
- Email: legaethics@flexera.com or ethicsoffice@flexera.com
- Mail: Send a letter to:

Chairman of the Ethics Committee, Flexera
c/o General Counsel
300 Park Blvd, Suite 400
Itasca, IL 60143

If you learn of a possible violation of law, regulation, or the Code through your own internal ethics reporting structure that may affect or impact Flexera, please also report it through the above channels.

Flexera encourages Suppliers to make such reports with as much information as possible, including identity, so that the matter can be investigated thoroughly. Once Flexera has received a report, we will promptly follow internal policy to take appropriate action to investigate the report and respond accordingly. Flexera expects all Suppliers to cooperate with any investigation, and will make every effort to protect confidentiality and, where permitted by local law, anonymity.

Flexera does not tolerate retaliation against or the victimization of any person who raises concerns or questions regarding a potential violation of the Code or any Flexera policy that he or she reasonably believes to have occurred. Flexera will take, and expects Supplier to take, all appropriate steps to prevent retaliatory or detrimental treatment of any individual making a report.

All other questions regarding this Code or Flexera’s legal compliance policies can be addressed to legaethics@flexera.com.