

Anti-Bribery and Anti-Corruption Policy

1. Introduction

This is Hitachi, Ltd. Global Compliance Department policy to be implemented by all Hitachi Group Companies.

1.1 Scope

This GlobalLogic Anti-Bribery and Anti-Corruption Policy (“Policy”) applies to GlobalLogic Inc., a Hitachi Group Company, including its subsidiaries and affiliated entities, in all geos around the globe (“GlobalLogic”) and to GlobalLogic’s staff. GlobalLogic’s staff shall take steps to ensure that anyone doing business with or on behalf of GlobalLogic, including contractors, consultants, advisors, agents, lobbyists, suppliers and business associates, as well as their respective officers, employees and subcontractors (collectively “GlobalLogic Business Partners”) comply with the terms of this Policy.

1.2 Objective

To ensure that GlobalLogic remains in compliance with all anti-bribery and anti-corruption laws in effect in all parts of the world in which it does business, as well as to demonstrate GlobalLogic’s firm commitment to acting with integrity at all times and to conducting business globally in an ethical and legal manner.

1.3 Background

Corruption is now recognized as an important issue around the world and most countries or regions have enacted some form of legislation to outlaw bribery and other forms of unethical and corrupt behaviour, in both the public and private sector. GlobalLogic has always prided itself on conducting its business ethically, but it is more important than ever that we make sure that we avoid even the perception of corruption or other illegal dealings. While jail time and individual and corporate fines are well-publicised penalties, reputational damage and huge costs are other major problems faced by companies found guilty of bribery or other illegal behaviour.

This Policy reflects and expands on the provisions of the Hitachi Group Code of Ethics and Business Conduct.

2. Global Principles and Definitions

General principles:

GlobalLogic, its staff and GlobalLogic Business Partners shall never engage in bribery, meaning that they shall not offer, promise or give anything of value to anyone, directly or indirectly, with the intent to obtain or retain business or otherwise to gain improper advantage for GlobalLogic.

GlobalLogic workforce shall never solicit or accept money or anything else of value from any person or organisation while conducting business.

2.1. Meaning in the Statements of Principle of “offer, promise or give”

A crime is not just committed if a bride is given to someone; anti-bribery law also prohibit merely offering or promising a bride, even if it is either refused or is not in fact paid or given, or even if it is being given to a third party that is not part of the business transaction, such as a designated charity.

2.2 Meaning of “anything of value”

Anti-bribery laws interpret “anything of value” very broadly, so it means anything that is considered to be of value by the intended recipient. While it might be cash, it could just as easily be tickets, a job offer or internship (even unpaid) for a family member, an electronic device, meals, alcohol, a fishing or golf trip, sexual favors, and so on. Or it could be a commission, an extra discount, sponsorship, travel, etc.

2.3 Meaning of “directly or indirectly”

The term “directly” means doing it yourself, while “indirectly” means arranging for someone else to do it on your behalf. If a third party bribes someone for you, you are just as liable as if you had done it in person. In fact, far from insulating you from responsibility for a bride, deliberately using an intermediary would increase your exposure to fines and/or jail time. It is no defence to claim that you didn’t know about a bride, if you should have known – meaning, for example, that you looked the other way, that you chose not to do background checks or other due diligence, or that it was likely that a bride would be paid.

2.4 Meaning of “an improper advantage for GlobalLogic”

What makes an advantage improper is that it influences someone to do something that they otherwise would not do in the course of a business relationship. For example, entertaining the procurement director of a government or commercial customer could be perceived as a bribery, if it is seen as influencing in GlobalLogic’s favor the selection of the winner of the customer’s upcoming contract award.

3. Anti-Bribery and Anti-Corruption Laws

Most countries and international institutions now have laws or conventions that address bribery and corruption, but the ones you will probably hear most about are the Japanese Penal Code and Unfair Competition Prevention Act, the U.S. Foreign Corrupt Practices Act, the Criminal Law of the People’s Republic of China, the U.K. Bribery Act, the Swiss Penal Code, the French Loi Sapin II, the OECD Convention on Combating Bribery of Foreign Public Officials in

International Business Transactions, and the Inter-American Convention Against Corruption. Each of these laws has an extra-territorial effect, meaning that a breach resulting in a penalty can occur anywhere around the world.

Feel free to contact GlobalLogic's Legal and Compliance department if you need details on any particular anti-bribery and anti-corruption law, or if you want to find out about a particular country's law.

4. Government or Public Officers

While bribery of anyone is unacceptable, the consequences of bribing government or public officers are particularly severe.

Regardless of whether domestic or foreign, government or public officers include:

- a) Any person who provides services for national or local governments
- b) Any person who provides services for an agency or organization affiliated with a government entity
- c) Any person who provides services for a public enterprise or state-owned entity
- d) Any person who is an employee or an agent of an international public organization (for example, the United Nations, World Trade Organization or World Bank)
- e) Any political party, party official, or candidate for political office
- f) Any person authorized by the government entity to exercise a public function
- g) Active or reserve members of police and armed forces
- h) Educational and medical employees of state-owned entities, including professors and doctors
- i) Journalists and representatives of state-controlled media
- j) Members of ruling or royal families

5. Facilitation or “Grease” Payments

Meaning of facilitation or “grease” payments:

Such payments are made for routine administrative activities that a government or public officer is already supposed to perform and they are considered bribery. Common examples include visas, custom's clearance, cargo handling, permit or license insurance, utility hook-ups, and building or safety inspections.

GlobalLogic does not allow facilitation or “grease” payments to be made, even if they are culturally acceptable in some countries. They may in rare instances be permitted, when there is an immediate threat of life, safety, security or freedom, or if public officers can provide a formal receipt or written confirmation of their legality. However, you must promptly report such payments to Legal and Compliance and record them accurately in finance and accounting records.

6. Gifts, travel and Entertainment

Lavish or extravagant gifts, travel and entertainment ('GTE') are a major area of enforcement focus by anti-corruption authorities, notably if the GTE lead to favourable treatment by or improper influence from the receipt or other party. In particular, there is a growing push-back against all cash or cash-equivalent gifts, including red envelopes and gift, restaurants and store cards, even in countries in which they were previously an integral part of the culture. GlobalLogic prohibits the giving of any cash or cash-equivalent gifts.

7. Red Flags

The most common "red flags" for bribery and corruption are:

- Bribery known or suspected to occur regularly in a given location such as a high risk country under the Corruption Perception Index (CPI)
- High fees or discounts; "extra margin"
- Lack of relevant expertise
- Third party refusal to certify compliance with anti-bribery/ anti-corruption laws
- Use of unapproved third parties or consultants to conduct a transaction
- Late addition of a previously unknown third party to a transaction
- A party with a history or reputation of unethical behaviour
- Offshore and/or cash payment requests
- Relationship between a party (e.g. consultant or distributor) and local public officers
- Requests for charitable donations or political contributions
- Requests for things of "value" (e.g. a paid trip to a resort, lavish gifts, reimbursement of a family member's expenses, etc.)

8. Measures to Prevent Bribery and Corruption

GlobalLogic will:

- a) Assign qualified staff to manage anti-corruption promotion within its organization
- b) Periodically train its workforce (meaning its officers, employees – whether full-time, part-time or temporary- and contractors) on how to recognize and avoid bribery and corruption.
- c) Ensure that human resources practices, including recruitment, promotion, training, performance evaluation, remuneration, recognition and business ethics in general, reflect these Rules.
- d) Verify the legality and appropriateness of contract terms by undertaking the laid down procedure for legal review of contracts.
- e) Obtain management and Finance approval of payment arrangements. Approving department insist on documentation of the services actually rendered before paying the contractual compensation and expenses.

- f) Develop separate Policies to address the giving and receiving of GTE, as well as charitable donations and political contributions.
- g) Where applicable include in contracts specific provisions that prevent bribery and corruption.
- h) Use caution and comply with anti-bribery laws and applicable guidelines, when considering the hiring of current or former public officers or their family members.
- i) Adopt best practices to prevent corruption in its business dealings.

9. Exceptions to this Policy

Should any GlobalLogic company wish to adopt stricter or more lenient principles or examples than those outlined in this Policy, an application must be made in writing to the Chief Legal Officer, whose decision on such exceptions will be final.

10. GlobalLogic's Expectations

Anti-bribery and anti-corruption laws vary in terms of their focus, their stringency and their degree of flexibility. For this reason and to comply with GlobalLogic's commitment to conducting business in an ethical and legal manner worldwide, this Policy reflects the highest level of integrity expected of GlobalLogic, its staff and GlobalLogic Business Partners, irrespective of any lesser requirements that exist in any region or country in which GlobalLogic does business.

11. Accounting and Business Records

Many anti-bribery and anti-corruption laws emphasize the need to keep accurate and timely books and records. Trying to hide or disguise bribes or other inappropriate expenditures through false accounting entries is not only against the law, but it will be treated as an exacerbating factor when penalties are being assessed. All records to demonstrate the compliance with this Policy must be retained in accordance with the relevant rules on retention of compliance related documents of the GlobalLogic.

Contact Finance or Legal and Compliance, if you have any questions as to how to record payments, either made or received.

12. Personal Liability

While companies are fined large amounts for breaches of anti-bribery and anti-corruption laws, penalties for individuals may include both personal fines and significant jail time. Separately, GlobalLogic's staff who violate this Policy will be subject to disciplinary action (e.g. up to and including termination of employment). Prompt and proper disciplinary action must be taken after undertaking proper investigation of all violations of this Policy, whether actual or suspected,

carried out in accordance with the relevant rules on conducting compliance related internal investigations and compliance related disciplinary actions of the GlobalLogic.

13. Suspicions and Reporting Violations

GlobalLogic values your help in reporting any actual or suspected breach of this Policy to your manager or local Legal team. In case of doubts please contact: compliance@globallogic.com

You may also file a report using our Hotline. You can find the link here: globallogic.com/hotline

When using the Hotline, you may report anonymously, unless prohibited by local law. GlobalLogic will never retaliate against you or tolerate harassment, discrimination, or retaliation by others, if you report in good faith.

14. Updates of this document

This document is reviewed and updated where necessary – especially in case of changes of applicable laws and best practice.

Change History

Revision	Change Description	Valid Date	Approver
1.0	Initial release	April 2, 2024	Kamila Koszewicz-Grzeszczak, VP Global Compliance & EMEA Legal