

# GlobalLogic Vendor Code of Conduct

## Introduction

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GlobalLogic, a Hitachi Group Company, is committed to ethical conduct throughout its global operations and supply chain. This includes GlobalLogic, and each of its vendors and suppliers, treating workers with respect and dignity, ensuring safe working conditions, and conducting ethical and environmentally responsible operations.

GlobalLogic expects all vendors and suppliers in our operations and supply chain, and their vendors and suppliers, to operate in accordance with the following responsibilities in this GlobalLogic Vendor Code of Conduct (“Code”), as well as in full compliance with all applicable laws and regulations.

GlobalLogic will assess vendor compliance with this Code regularly. Any violations of this Code may jeopardize a vendor’s business relationship with GlobalLogic, up to and including termination of the relationship.

This Code applies to all GlobalLogic vendors and suppliers who engage in business relationships with GlobalLogic or on behalf of GlobalLogic, and their subsidiaries, affiliates, subcontractors, and next-tier suppliers (each a “Vendor”). GlobalLogic includes all subsidiaries and affiliates of GlobalLogic, worldwide.

GlobalLogic expressly retains the right to unilaterally modify or amend this Code, at GlobalLogic’s sole discretion, with or without prior notice to Vendors.

### **Vendor Compliance with GlobalLogic’s Vendor Code of Conduct**

**Underlying Obligations.** GlobalLogic vendors must comply with all applicable laws, regulations, government directives and guidelines, in addition to all other contractual obligations with GlobalLogic.

**On-Site Work.** Vendors using GlobalLogic properties or facilities must comply with all applicable policies and requirements. Vendors accessing or using our customer properties or facilities must also comply with all of our customer’s applicable policies and requirements.

**Cooperation.** Vendors will cooperate with all reasonable information requests we may initiate to confirm their compliance with this Code. GlobalLogic may terminate relationships with any vendor failing to cooperate, and meet these responsibilities.

# Labor and Human Rights

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GlobalLogic is committed to upholding human rights, and treating workers with dignity and respect. This applies to all workers, including temporary, student, contractor, direct employee, and any other type of worker. Vendors must manage their own workforce to achieve the following results:

**Modern Slavery.** Vendors must ensure all work is voluntary, and that Vendor employees are able to terminate their employment at any time. Vendors must prohibit any form of slavery, forced, bonded, indentured, or any other form of compulsory labor, including slavery or slave trafficking, directly or within their supply chain. Involuntary labor includes the use of threat, force, coercion, abduction, fraud, the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of purpose of exploitation. Vendors will not confiscate any original government-issued identification, immigration documents, passports, work permits, or other identity or immigration documents, unless required by law. Vendors will not unreasonably restrict workers' freedom to move within, or enter and exit, working facilities. Vendors are expected to give each worker a written agreement describing the terms and conditions of employment. GlobalLogic vendors are expected to not require workers to pay recruitment or other fees for their employment with the vendor, either directly or through third parties, and are expected to repay any worker that has paid such fees.

**Prohibition on Child Labor.** GlobalLogic vendors will not use child labor. "Child" means any person under age 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

**Wages.** GlobalLogic vendors will comply with all applicable wage and hour laws and regulations. Wage compliance includes, without limitation, the timely and accurate payment of all legally-mandated wages and benefits, minimum wage laws, wage deductions, and paystub requirements, each as applicable to Vendor's operations. Vendors are expected not to deduct from wages as a disciplinary measure.

**Working Hours.** Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest.

**Anti-Discrimination.** Vendors must not discriminate in screening, hiring, or employment practices based on the basis of race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status, or any other status protected by applicable law, with the exception of any local requirement to adopt affirmative action in a particular jurisdiction. Vendors will not subject workers or potential workers to unlawful medical tests or physical exams.

**Anti-Harassment and Abuse.** Vendors will encourage a workplace free of harassment and abuse, and must treat their employees with respect and dignity. Vendors must not permit harassment, abuse, corporal punishment, or inhumane treatment.

**Freedom of Association and Collective Bargaining.** In accordance with local laws, Vendors will respect workers' right to associate freely, bargain collectively, and seek representation. Vendors must respect any legal rights of their employees to join trade unions or form associations, and must not impose restrictions on these rights. Vendors are expected to permit workers to openly communicate

and share grievances with management about working conditions without fear of reprisal or harassment.

## Health and Safety

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Vendors will provide and maintain a healthy and safe work environment.

**Occupational Safety and Health.** Vendors will comply with all applicable safety and health laws and regulations, and identify, evaluate, and control worker exposure to safety and health hazards. Vendors must maintain and comply with all health and safety permits required, and take appropriate measures to prevent workplace injuries.

**Emergency Preparedness.** Vendors will identify and plan for potential emergencies, and will implement emergency plans and emergency response procedures that minimize harm to life, environment, and property.

## Environmental

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Vendors must comply with all applicable environmental and related laws and regulations. Vendors will obtain, keep current, and comply with all required environmental permits, approvals, and registrations.

Vendors will work to identify, manage, reduce, and responsibly reduce, recycle, dispose of, or eliminate waste of all types. Where waste cannot be eliminated, Vendors will manage and control waste to comply with applicable laws and regulations, and in an environmentally responsible and secure way.

## Ethics and Compliance

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Vendors will uphold the highest standards of ethics to promote honesty and integrity in business operations, including:

**Business Integrity.** Vendors will avoid even the appearance of conflicts of interest in their work with GlobalLogic, and will immediately disclose any known family or other close personal relationships with GlobalLogic employees. Vendors will not offer or accept any form of bribery, corruption, extortion, or embezzlement. Vendors will maintain their books and records according to applicable laws and regulations, and accurately reflect their business dealings in their books and records.

**Anti-Bribery and Anti-Corruption Compliance.** GlobalLogic policy and global anti-bribery and anti-corruption laws prohibit any unlawful payment or act in furtherance of an unlawful payment, either directly or through agencies or intermediaries, for the purpose of obtaining or retaining business, or to influence a business decision. Vendors must not make unlawful payments, and must not give, offer, promise to offer, or authorize the offer, directly or indirectly, of anything of value to any third party, including government officials or officials of any political party, which could be regarded as influencing any business decision or for obtaining improper advantage in connection with GlobalLogic business, or in connection with any commercial transaction or relationship involving GlobalLogic. "Government officials" include employees of government companies, public sector undertakings, departments,

institutions, and officials. Vendors must be accurate in all invoices as per the terms of the Vendor contract with GlobalLogic, and not make false or misleading entries on invoices or claims submitted for payment. Vendors will implement monitoring and enforcement procedures to ensure compliance with all anti-corruption laws and this Policy.

**GlobalLogic Assets.** Vendors will respect intellectual property rights. Vendors must ensure their workers use GlobalLogic assets and resources in a legal and ethical manner, and in compliance with all applicable laws and policies. Vendors may not use GlobalLogic’s name or logo except for duly authorized and permitted purposes.

**Responsible Materials Sourcing.** Vendors are expected to use due diligence on relevant materials in their supply chain, including to determine whether relevant materials originate from high-risk locations, including regions of conflict, and with risk of child labor, forced labor and human trafficking, human rights violations, or other objective high-risk activities.

## Communication

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Vendors must periodically communicate the standards of this Code to their employees, and ensure compliance. Vendors are encouraged to raise any concerns arising out of their relationship with GlobalLogic or its officers or employees, including any suspected violations of this Code, by sending an email to [vendor-reports@globallogic.com](mailto:vendor-reports@globallogic.com). GlobalLogic will investigate all communications, and Vendors must prohibit retaliation against employees who make good faith reports to GlobalLogic.

## Change History

Revision	Change Description	Valid Date	Approver
1.0	Initial release	Oct 13, 2020	Rich Gray, General Counsel
2.0	Annual review	Nov 18, 2022	Jae Kim, Chief Legal Officer