



# Business Partner Code of Conduct

## A Letter from Leadership

Dear Business Partners,

The success of Unisys Corporation is driven by our commitment to providing our clients with quality services and solutions to drive their business objectives forward.

To achieve this, we must have an ethical workforce that consistently holds itself to the highest standards. These expectations apply not only to our associates, but also extend to our Business Partners and their employees and sub-contractors. It is the responsibility of our Business Partners to implement management systems that facilitate compliance with our Business Partner Code and the laws to mitigate related operational risks, and to facilitate continuous improvement.

When you do these things, you help us maintain the culture of integrity we value at Unisys.

Sincerely,

Gwendolyn Lee Hassan, JD, CCEP | VP & Chief Compliance Officer

Jon Good, VP & Chief Procurement Officer

## Introduction & Company Statement

Establishing and growing strong relationships with our Business Partners is critical to ensuring Unisys' success. The Unisys Business Partner Code of Conduct ("Business Partner Code") was created to communicate our expectations to the third parties with whom we do business including all employees and subcontractors performing work on behalf of those third parties ("Business Partners").

## Purpose

The Business Partner Code is the foundation of our relationship with our Business Partners. The purpose of the Business Partner Code is to outline our expectations according to both law and our Unisys core values and beliefs - ensuring consistent compliance from all our Business Partners.

## Human Rights Commitment

The Business Partner Code is rooted in a deep commitment to human rights.

We expect all Business Partners to commit to the protection of human rights throughout their supply chain and to honor the highest standard when applicable laws and regulations differ. Basic human rights should always be respected. Therefore, all forms of slavery, human trafficking, forced labor, and illegal child labor as defined by applicable law are prohibited by our Business Partners.

## Risk Assessment and Management

We expect our Business Partners to develop and maintain processes that identify risks in all areas addressed in this Business Partner Code; assess the significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.

## Verification

Upon request, we may require our Business Partners to provide documentation verifying their compliance with both the Business Partner Code and all applicable laws and regulations.

## Scope

This Business Partner Code applies to any person or entity who provides goods and/or services to Unisys, whether directly or indirectly as a subcontractor or sub supplier to a Business Partner. This Business Partner Code is not exhaustive; Business Partners are required to use their own discretion and judgment to ensure compliance with unaddressed topics. For additional information regarding our internal expectations, refer to our [Code of Ethics and Business Conduct](#).

## Definitions

### Applicable Laws and Regulations

As a Unisys business partner, you must comply with all applicable laws, rules and regulations in every country, state, or locality where you do business. You must not commit an act in violation of applicable laws or this Business Partner Code, or directly or indirectly instruct, encourage, or facilitate violations by others, for any reason.

### Business Partner

An organization, including their own employees, subcontractors, business partners and suppliers, who provides goods and/or services to Unisys.

### Unisys

Unisys Corporation, a Delaware corporation with offices located at 108 Lakeview Drive, Blue Bell, Pennsylvania, 19422. USA including all its Affiliates worldwide.

## Ethics

Unisys expects the highest standards of ethics, integrity, and responsibility in all our operations and endeavors. Business Partners are required to be ethical in all aspects of their business, practices, operations, and relationships.

We hold our Business Partners to the highest ethical standards. Business Partners may not engage in bribery, embezzlement, extortion, or any other corrupt or unlawful practices in connection with Unisys business.

## Accuracy of Business Records

All payments and other transactions related to the business relationship between the Unisys Business Partner must be properly authorized and be timely and accurately recorded in accordance with generally accepted accounting principles and established accounting policies.

## **Disclosure of Information**

We expect our Business Partners to accurately record and disclose information regarding its business activities, without falsification or misrepresentation, to all appropriate parties and as required by law.

## **Fair Competition and Antitrust**

Business Partners must deal honestly and fairly with Unisys and its clients, associates, and other Business Partners. We require our Business Partners to conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which they operate.

## **Conflicts of Interest**

Business Partners must avoid relationships, arrangements, investments, or situations in which there is an actual or potential conflict of interest between the Business Partner's commitments to Unisys and its other business interests. If such conflicts or potential conflicts cannot be avoided, the Business Partner must promptly disclose the nature and scope of the conflict or potential conflict to Unisys. The existence of conflicts of interest may necessitate a termination of the business relationship.

## **Anti-Bribery/Anticorruption**

Business Partners must use only lawful and ethical practices in business dealings, and must not accept, offer, or make bribes, kickbacks, payoffs or any other form of improper payments. Business Partners must comply with all anti-bribery laws, including the U. S. Foreign Corrupt Practices Act (the FCPA), the U.K. Bribery Act, and any other anti-bribery law in the jurisdictions where they do business. In accordance with anti-bribery laws, Business Partners, must not directly or indirectly give, offer, or promise anything of value to anyone for the purpose of obtaining an improper business advantage or to influence any person inappropriately. Anything of value can include, among other things, providing discounts, donations, favors, rebates, or excessive or frequent gifts or entertainment of any kind.

Facilitating Payments (sometimes referred to as "grease payments"), which are customarily made directly to Public or Government Officials to encourage those officials to prioritize or speed up the completion of routine, non-discretionary governmental actions, such as approving permits and processing applications, are never allowed in connection with Unisys business, even if permitted by local law.

## **Gifts and Entertainment**

While exchanging reasonable business courtesies for the purpose of creating good will and promoting sound business relationships is a common and accepted practice, it is important that it be done in a modest and measured way. Business courtesies should be reasonable in amount, appropriate, infrequent, and in accordance with customary and accepted business practices and with applicable laws, regulations, and policies. Careful attention should be given to the frequency of business courtesies given to the same individual to avoid even the appearance of impropriety. Many public sector customers prohibit their employees from accepting any business courtesies or severely limit what can be accepted. Private sector customers may also have internal guidelines restricting employees' acceptance of business courtesies. Unisys Business Partners must be mindful of and comply with all applicable client restrictions.

## Confidentiality/Privacy

To conduct day-to-day business with Unisys, Business Partners may need access to Unisys confidential information and records, including personal data. Business Partners must ensure this information is protected and remains confidential and abide by all applicable data privacy laws and regulations. Business Partners may not disclose this information unless given written permission from Unisys. Unisys Business Partners should take appropriate steps to ensure that any Unisys confidential information is safeguarded against unauthorized access, use or disclosure.

### Confidential information of others

Just as we endeavor to protect our information, other companies do so as well. In undertaking joint business activities with Unisys, Unisys Business Partners may not solicit, receive, or use any confidential information belonging to others without proper authorization. Confidential information of others, rightfully received, should be handled with at least the same degree of care each Business Partner uses to protect their own confidential information to avoid loss, misuse, or unauthorized disclosure of such information.

### Protection of personal data

Personal data is any information that can be used directly or indirectly to identify a specific individual (including without limitation, information such as an individual's name, address, phone number, E-mail address, employee number, Social Security number, national identifier, or credit card number). Unisys Business Partners are responsible for understanding what personal data they are handling and ensuring that such handling complies with applicable law, contractual agreements and obligations.

## Intellectual Property

Business Partners must respect the intellectual property rights of others, including those of Unisys ("IP"), including processes, information, technology, and client information. Business Partners are required to make all reasonable efforts and take necessary precautions to safeguard IP and protect Unisys intellectual property rights. Business Partners shall not infringe or misappropriate the IP of others including Unisys and shall not use the IP of others in a manner not specifically authorized by them in writing. Business Partners will not modify Unisys IP nor use it in the provision of services to any other party.

## Responsible Use of Artificial Intelligence

Unisys is committed to the ethical use of artificial intelligence ("AI"). This means we expect our Business Partners to be responsible for the governance, design, development, monitoring, and performance of their AI systems used on Unisys' behalf. Business Partners should prioritize human-centric approaches in their processes, establish governance frameworks that are free from bias and discrimination uphold honesty and fairness in system decisions, and ensure that their AI systems are safe, secure, auditable, transparent, and explainable.

## Insider Trading

Business Partners cannot purchase, sell, or trade Unisys securities if they are in the possession of, or aware of, material, nonpublic information about Unisys.

Information is material if a reasonable investor would consider it important in deciding whether to buy or sell a company's securities. Information is nonpublic if it has not been broadly communicated

to the investing public. It is illegal to trade in Unisys securities based on material, nonpublic information.

Business Partners must never buy or sell any securities based on material, nonpublic information or give someone else (for example, a friend, spouse or broker) a “tip” regarding material, nonpublic information, or recommend or suggest that anyone trade based on material, nonpublic information.

## **Speaking Up / Whistleblower Protection and Anonymous Complaints**

Business Partners have a responsibility to affirmatively and promptly report any suspected, potential, or actual violation of this Business Partner Code or the Unisys Code of Ethics and Business Conduct to the Unisys Ethics & Compliance Office. The issue should be reported even if you believe the issue may have been resolved or if you are not sure whether it constitutes a violation. You may contact the Ethics & Compliance Office on a confidential basis without fear of retaliation. Contact the Ethics & Compliance Office using the Web portal:

[www.UnisysCompliance.com](http://www.UnisysCompliance.com), by email at [ComplianceEthicsOffice@unisys.com](mailto:ComplianceEthicsOffice@unisys.com), or by mail using this address: Ethics & Compliance Office, Unisys Corporation, 801 Lakeview Drive, Suite 100, Blue Bell, PA 19422. Anonymous reports are also accepted and processed. If you reside in Australia, the EU or the U.S., or work with Australian, EU member countries, or U.S. based Unisys entities, please read the specific whistleblower protection procedure in Appendix A.

## **Workplace Standards**

Business Partners are required to follow all general workplace standards and must comply with all applicable laws and regulations, including those that relate to labor, wages, working hours, discriminatory hiring and employment practices, and health and safety. This commitment establishes and ensures a safe working environment for all Business Partner employees.

## **Nondiscrimination**

Business Partners may not engage in or tolerate any discriminatory conduct against any person on any basis, including age, race, nationality, gender identity or expression, pregnancy, disability, sexual orientation, religion, veteran status, marital status, citizenship or other protected class by law or in retaliation for raising good faith complaints of discriminatory conduct.

## **No Harassment**

All Business Partner employees have a right to a workplace free of harassment and abuse. We require our Business Partners to prohibit all types of harassment including, but not limited to, physical, verbal, psychological and sexual harassment, and retaliation for raising good faith complaints of discriminatory conduct.

## **No Substance Abuse**

Business Partners must create and maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances to the extent permitted by applicable law.

## **No Forced Labor**

Business Partners must ensure that all work performed by their employees is on a voluntary basis. Business Partners may not use or tolerate the use of any illegal form of forced labor, including trafficked, bonded, slave, indentured, or prison labor in their own workforce or elsewhere in their supply chain.

Business Partners are expected to provide their employees an environment respectful of human dignity and their fundamental rights.

### **Child Labor**

Business Partners must not use illegal child labor and may not tolerate the use of illegal child labor in their supply chain. All Business Partner employees must be of legal age established by working age laws of their country of operation. If local law does not set a minimum age, Business Partner employees must be at least eighteen years of age. To ensure compliance, Business Partners must create and maintain official and verifiable documentation of each of its employees' ages.

### **Working Hours**

Business Partners must comply with all applicable laws and regulations regarding working hours, break periods, and overtime hours in any jurisdiction where the Business Partner operates.

### **Wages and Benefits**

Business Partners must pay their employees in accordance with applicable wage laws, including minimum wages, overtime hours and mandated benefits in all jurisdictions where they operate. Business Partner employees must not be expected to work additional hours to earn minimum wage for a day's work and this prohibition must be extended throughout their supply chain.

### **Freedom of Association and Union Association**

Business Partners must recognize, respect, and protect their employees' lawful rights to freely associate and collectively bargain in accordance with applicable laws and regulations and without fear of retaliation.

### **Immigration**

Business Partners must comply with applicable immigration laws and regulations in any jurisdiction where they operate and only employ workers with a legal right to work in the relevant location.

### **Trade Compliance**

Business Partners must comply with applicable trade compliance laws and regulations, including but not limited to laws pertaining to sanctions, export controls, and import controls in any jurisdiction where they operate in addition to U.S. laws that govern Unisys products and services.

### **Subcontractors/ Third Party Employment Agencies**

Unless otherwise agreed, Unisys must provide prior written approval for the use of subcontractors in connection with Unisys work. Business Partners are responsible for educating and training subcontractors and ensuring subcontractors are compliant with the provisions of this Business Partner Code and the law.

### **Health, Safety Practices, and Housing**

Business Partners must comply with all applicable safety and health laws and regulations in the countries in which they operate. It is expected that Business Partners provide their employees with a healthy and safe workplace, including access to clean, safe and reasonable working conditions.



### Occupational Safety

Business Partners must protect workers from exposure to chemical, biological, and physical hazards, in addition to on-site accidents. Business Partners are expected to identify, evaluate, and manage these occupational health and safety hazards.

### Emergency Prevention Section

Business Partners must identify and assess potential emergency situations in the workplace. Business Partners must develop and implement emergency plans and response procedures, including but not limited to fire alarms, fire drills, exit facilities, fire detection and suppression equipment, and recovery plans to minimize harm to life and property.

Business Partners must regularly test emergency preventative methods, such as fire alarms, fire suppression systems, and evacuation plans to ensure they are sufficient and in good working order.

### Infectious Disease Preparedness and Response

Business Partners must develop, implement, and maintain a program to prepare for, prevent, and respond to the potential of an infectious disease outbreak among its employees.

### Incident Management

Business Partners must create and maintain procedures to prevent, manage, track, and report employee safety incidents. Business Partners are expected to implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate employees' return to work.

### Housing Facilities

Business Partners who provide housing facilities to employees, must adhere to all applicable legal requirements for such housing. At a minimum, such housing must include ample safe and clean-living space and comfortable sleeping quarters, ample clean toilet and bathing facilities, easy access to ample supplies of potable water, and easy access to sanitary food preparation and eating facilities. Living spaces must be safe, secure, and separate and distinct from the factory/ production area and must also be separated by gender and include appropriately sized and segregated secure family living quarters for employees who are part of the same family unit (e.g. spouses, parents and children, siblings etc.)

## **Sustainability**

We recognize our responsibility to the environment and seek to operate sustainably. Business Partners are expected to apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint. Business Partners must follow all applicable laws and regulations regarding environmental practices.

### Pollution Prevention

Business Partners must strive to reduce consumption of resources, including raw materials, energy, and water. Business Partners are expected to implement improvement plans for waste reduction, recycling, and energy conservation policies and seek ways to use cleaner sources of energy.

## **Conflict Minerals and Supply Chain Due Diligence**

Business Partners must not use raw materials with supply chains linked to human rights violations. Suppliers must comply with the conflict mineral tracing and reporting requirements of the Dodd-

Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission as well as all other applicable supply chain due diligence regulations including the European Union Corporate Sustainability Reporting Directive and European Union Corporate Sustainability Due Diligence Directive.

### **Permits and Reporting**

Business Partners must obtain and maintain all required environmental permits and must comply with the reporting requirements of applicable permits and regulations.

### **Audits and Inspection**

Unisys reserves the right to audit Business Partners at any time to ensure compliance with the standards in this Business Partner Code. Business Partner facilities (and factories where applicable) can be inspected as a part of this process. If permission to conduct an audit is denied, consequences up to and including termination of our agreement may result.

### **Penalties for Noncompliance**

Part of conducting business with Unisys includes compliance with this Business Partner Code. If Unisys has reason to suspect, in its sole discretion, that a Business Partner is not adhering to this Business Partner Code, Unisys may, but is in no way required to, work with the Business Partner to correct their practices and require them to implement new controls to ensure compliance with the requirements outlined in this Business Partner Code. Notwithstanding that option, however, Unisys at all times retains the right to terminate all business with a Business Partner who Unisys has reason to believe has failed to adhere to this Business Partner Code.



## APPENDIX A - Country Specific Considerations

Note: "Whistleblower" is a term commonly used in the legislation of many countries to describe an individual who reports significant wrongdoing related to business or government conduct. Various statutes have more specific definitions.

Most countries provide options for reporting issues directly to local regulators through a local Office of the Whistleblower. Your specific city, state, province, or country may use different names for these reporting channels which will vary depending on local language and custom. A few countries with specific whistleblower regulations include, but are not limited to:

### Australia

There are specific provisions under Australian legislation which provide whistleblowers with legal rights in relation to certain types of disclosures. Unisys Australia has a detailed policy and associated processes in place to ensure compliance with the Australian law. Please refer to the Australia Whistleblower Policy.

### European Union

From December 2021, the EU Whistleblower Protection Directive entered into force, requiring each of the EU member states to implement local laws to protect those who raise allegations of misconduct in commercial and public organizations. EU whistleblower protection procedure was developed for Unisys subsidiaries located in EU member states to address the requirements set in local whistleblower protection laws.

### United States

For issues related to wages and hours, associate safety, or employment discrimination, each state has its own state agency (most often a State Department of Labor) with whom you may file a report and seek assistance. You may also contact the U.S. Department of Labor at the federal level. For potential violations of securities laws, you may contact the Securities and Exchange Commission's Office of the Whistleblower.

## Revision History

Version Date	Author	Revision Description	Approved By
09/12/2017	Anne Andrews	Original policy document	Michelle Beistle
08/26/2024	Anne Andrews	Updating content	Gwendolyn Hassan & Jon Good
3/12/2025	Anne Andrews	Update G. Hassan title	Gwendolyn Hassan & Jon Good

Policy Type: Global Procurement	Policy Owner(s): Ethics & Compliance Office and Global Procurement	Supersedes:
Policy Name: Business Partner code of Conduct	Effective Date: 09/12/2017	Superseded Date: 08/26/2024
Policy Number: GP 1.0	Issue Date: 3/12/2025	Last Reviewed: 03/12/2025