

Business Partner Code of Conduct

June 2021

At Digital Edge we aim to adhere to the highest level of ethical conduct in all aspects of our business. This also means ensuring our business partners share an equally strong commitment to ethical business practices.

Digital Edge is providing this Business Partner Code of Conduct (the “Code”) to all of our business partners to ensure that the expectations and standards upheld at Digital Edge are understood and adhered to by our business partners. This Code is founded on the principles set forth in our Business Code of Conduct which is applicable to all our employees, officers, and directors and which is available on the Digital Edge website www.digitaledgedc.com.

Please take the time to review this Code, become familiar with it and draw guidance from it. As one of our valued business partners, we expect you to comply with this Code insofar as it relates to our business relationship. You are responsible for establishing policies and monitoring practices so that all your employees, independent contractors, consultants, and all others who do business for or on your behalf understand and comply with the provisions of this Code.

If a situation arises that, in your opinion, violates this Code, we expect you to report it immediately to Digital Edge’s [Ethics Helpline](#) identifying yourself as a business partner.

Compliance with Laws and Regulations

Business partners are expected to act within the bounds of all applicable laws, rules, and regulations.

Corruption, Extortion, Bribery or Embezzlement

Business partners must conduct their activities in full compliance with the anti-corruption and anti-bribery laws of the country, or countries, in which they are operating and with the United States Foreign Corrupt Practices Act, the UK Bribery Act, and the principles of the OECD Convention on Combating Bribery of Foreign Public Officials.

Business partners may not directly or indirectly through a third party, pay, offer, promise to pay, or receive bribes, kickbacks or facilitating payments from any individual, whether that individual is a public official or a private party. A public official is any person who is paid with government funds. This includes individuals who work for a local, state/provincial, or national government, or a public international organization, as well as employees of public (government-owned or operated) schools and state-owned enterprises. Employees at such organizations are considered public officials regardless of title or position.

Bribes

A bribe is offering or giving anything of value to any person for the purpose of obtaining or retaining business or securing an improper advantage. Anything of value includes cash, cash equivalents, meals, or entertainment, and may also include a promise or other intangible benefit.

Kickbacks

A kickback is a payment or anything of value given to individuals after a transaction, typically for providing a discount or arranging high volume in a sales agreement.

Facilitating Payments

Facilitating payments are small payments to a public official to expedite or secure the performance of routine, nondiscretionary government action. These types of payments are typically demanded by low-level officials in exchange for providing a service to which you are entitled even without the payment.

Money Laundering

Business partners may not engage in or assist others in concealing illicit funds or money laundering activities. The following are sample indicators of money laundering that merit further investigation by business partners:

- ✓ Attempts to make large payments in cash.
- ✓ Payments by someone who is not a party to the contract.
- ✓ Requests to pay more than provided for in the contract.
- ✓ Payments made in currencies other than those specified in the contract.
- ✓ Payments from an unusual, nonbusiness account

Trade Restrictions, Export Controls, and Customs

All transactions must comply with United States export and customs laws and additional export and customs laws in the countries where business is being conducted. Business partners whose business activities involve the sale or shipment of products, technologies, or services across international borders must understand and ensure compliance with all laws or restrictions that apply in connection with those activities.

Gifts, Entertainment and Travel

Gifts, entertainment, and travel are often an integral part of building and maintaining business relationships and advancing the interests of Digital Edge. To avoid even the appearance of a conflict, Business partners are expected to fully respect the spirit and letter of Digital Edge's Gift & Entertainment Policy and Travel Hosting Policy which provide, in part:

- ✓ Business partners should not offer gifts, entertainment, or travel to a Digital Edge employee, nor is acceptance of these permitted beyond a nominal value (retail value \$150 or less). Items such as these should never be on a regular or multiple basis.
- ✓ Business partners should not offer any gift, entertainment or travel to any Digital Edge employee who plays a role in the decision while a Request for Information, Request for Proposal or contract negotiations process is underway in which the business partner is participating.
- ✓ Employee travel and accommodations related to business or entertainment events should be at Digital Edge's expense. Do not offer to provide travel and accommodations to business or entertainment events.
- ✓ Business partners must not offer bribes, kickbacks, payoffs or other unusual or improper payments to Digital Edge employees in order to obtain or keep business.
- ✓ Likewise, a Business Partner should never accept cash or a noncash gift, bribes or kickbacks from a Digital Edge employee to influence them to take or not take a course of action or for any other improper purpose.

Contact your Digital Edge representative or the Digital Edge [Ethics Helpline](#) before engaging in any activity that may involve gifts, entertainment, or travel to ensure they meet the requirements of Digital Edge's internal policies.

Labor and Human Rights

Business partners must uphold the human rights of workers and treat them with dignity and respect as understood by the international community.

Discrimination

We are dedicated to maintaining a creative, culturally diverse, and supportive work environment, and do not tolerate discrimination of employees or non-employees with whom we have a business, service, or professional relationship. Business partners may not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination, and retirement. Business partners may not require a pregnancy test or discriminate against pregnant workers (subject to requirements of applicable laws and regulations). In addition, business partners may not require workers or potential workers to undergo medical tests that could be used in a discriminatory way except where required by applicable law or regulation or prudent for workplace safety.

Wages and Benefits

Business partners must pay their workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, business partners' workers must be compensated for overtime hours at the premium rate required by applicable laws and regulations. Business partners may not use deductions from wages as a disciplinary measure. Workers must be paid in a timely manner, and the basis on which workers are being paid must be clearly conveyed to them in a timely manner. Business partners must maintain accurate records of employee hours worked and wages paid.

Child Labor

Child labor is strictly prohibited. Business partners must comply with all applicable child labor laws, including the minimum age for employment in all countries where it does business, or the age for completing compulsory education in such countries, whichever is higher. This Code does not prohibit participation in legitimate workplace apprenticeship programs 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.

Diversity

Digital Edge believes competitive strength is achieved through a diverse group of people working together to find the best solutions and is committed to providing procurement opportunities to diverse suppliers in the various communities we serve. Digital Edge expects its business partners to exercise diversity in their daily business when it comes to their employees as well as in their decisions to select subcontractors.

Health and Safety

Digital Edge recognizes that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale, produce innovative products and provide high-quality services. Business partners must be committed to creating safe working conditions and a healthy work environment for all of their workers and must comply with all safety regulations.

Harsh Treatment and Harassment

Digital Edge does not tolerate unlawful harassment or any mistreatment (including sexual harassment or discrimination) by or of its employees, officers, guests, clients, or partners in the workplace or in a work-related situation, particularly on the basis of sex, race, color, nationality, ethnic or national origin,

ancestry, citizenship, religion (or belief, where applicable), age, physical or mental disability, medical condition, sexual orientation, veteran status, marital status, genetic information or characteristics (or those of a family member), or any other category protected under applicable federal, state, or local law. Furthermore, we do not tolerate workplace violence of any kind. Business partners must be committed to a workplace free of harassment and violence. Business partners may not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse.

Drug-free Workplace

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, contractors and third parties which do business with Digital Edge and we do not permit it. Digital Edge prohibits Business partners from performing work activities for or on behalf of Digital Edge while under the influence of any substance, including drugs or alcohol, which prevents them from conducting their work safely and effectively.

Fair Business, Advertising, and Competition Practices

Business partners must uphold fair business standards in advertising, sales, and competition.

Competition and Sales Practices

Digital Edge is committed to adhering to applicable antitrust or competition laws. Unfair methods of competition and deceptive practices involving Digital Edge products are prohibited. Laws regulating competition and trade practices vary around the world, but certain activities, such as price fixing or agreeing with a competitor to allocate customers, are almost always illegal. Business partners must understand and ensure compliance with all competition and trade practices laws or restrictions that apply in connection with their business activities.

Obtaining and Using Business Intelligence

Business partners who collect information on customers and markets in which they operate must do so only through legitimate means. Business partners must not seek business intelligence by illegal or unethical means.

Accuracy of Records and Reports

Accurate records are critical to meeting legal, financial, and management obligations. Business partners must ensure that all records and reports that they provide to Digital Edge, or to any government or regulatory body that reflects business with Digital Edge, are prepared in reasonable detail to accurately reflect the operations of its business and dispositions of its corporate assets, and are full, fair, accurate, timely, understandable, and compliant with applicable legal and financial standards. Business partners must never misstate facts, omit critical information, or modify records or reports in any way to mislead others, or assist others in doing so.

Honest and Accurate Dealings

Business Partners must not make any false representations in connection with any Digital Edge transactions, including, but not limited to, oral misrepresentations of fact, the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, or other false or inaccurate records.

Privacy

Digital Edge is committed to ensuring the privacy of the end-user customers of Digital Edge products and services. Digital Edge's Privacy Policy covers the collection, use and disclosure of personal

information that may be collected by Digital Edge, a copy of which may be found at <http://www.digitaledgedc.com/privacy>. Business partners are required to comply with all privacy laws and regulations. Minimally, Business partners must take appropriate precautions — including administrative, technical, and physical measures — to safeguard customers' personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. Failure to protect customer private information may damage Digital Edge's relations with its customers and may result in legal liability for business partners.

Confidentiality of Digital Edge Information

Business partners must strictly abide by all nondisclosure agreements and other agreements regarding the confidentiality of information. Business partners must not comment on Digital Edge business matters, including any programs, policies, or contract terms. If a Business partner mistakenly receives Digital Edge confidential and proprietary information, the Business partner is required to immediately return the information to its Digital Edge point of contact.

Protection of Intellectual Property

Business partners must respect the intellectual property rights of Digital Edge and third parties and may not knowingly use the intellectual property of any third party unlawfully.

The Environment

At Digital Edge, environmental considerations are an integral part of our business practices. Business partners must have a similar commitment to reducing the environmental impact of their operations. Business partners must endeavor to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in its facilities and by recycling, reusing, or substituting materials.

Digital Edge expects every business partner to be both innovative and cooperative in implementing an effective assessment methodology. Furthermore, Digital Edge expects its business partners to comply with any additional environmental specifications required for products and services designed or manufactured for Digital Edge.

Whistleblower Protection

Business partners must create programs to ensure the protection of whistleblower confidentiality and to prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of this Code.

Corrective Action Process

Business partners must have a process for timely correction of any deficiencies or violations of this Code identified by any internal or external audit, assessment, inspection, investigation, or review.

Reporting

Business partners must in good faith report any violations of this Code (whether such violations are your own, another business partner's, or a Digital Edge employee's) to us within three (3) days of identifying such a violation. All such reports should be sent to Digital Edge's [Ethic's Helpline](#).