

Partner Code of Ethics and Business Conduct

INTRODUCTION

We at Hitachi Vantara believe that high ethical standards are the foundation of both a successful business and a great work environment. The purpose of this Partner Code of Ethics and Business Conduct (“Partner Code”) is to articulate our commitment to ethical business practices and to make clear what is expected of anyone with whom we do business (“Hitachi Vantara Partner”).

Hitachi Vantara considers any violation of the Partner Code to be a serious issue and we expect your cooperation with any associated investigation, when requested. In the event of a material violation by you or by your employees, contractors or any person acting on your behalf, we reserve the right to suspend or terminate your contract with us.

PERSONAL CONDUCT

A. Work Environment

Hitachi Vantara is committed to a safe and productive work environment, so we require you to act respectfully towards our employees as well as your own, avoiding in particular any form of **Harassment** based on the following categories protected by law: race, ancestry, color, religion, politics, military service, sex, gender, sexual orientation, marital or family status, pregnancy, age, national or ethnic origin, disability, or genetic information.

*Meaning of **Harassment**:* Unwelcome behavior aimed at an individual based on one or more of the legally-protected categories listed above, that is sufficiently serious to affect materially that individual’s work environment. It is the reaction of the person targeted that matters, not the intent of the harasser.

B. Social Media

Hitachi Vantara recognizes the value of social media and understands that its proper use can be a business advantage. However, since communication is now almost non-stop and instantaneous, there is a significant risk of errors in tone, content and distribution. You will be held accountable for what you publish on social media, particularly if it concerns Hitachi Vantara, our employees, or your relationship with us. You will also be required at all times to protect confidential information of both Hitachi Vantara and third parties.

LAWFUL AND ETHICAL BEHAVIOR

A. Relationships with Customers

Hitachi Vantara places the highest value on our interactions with customers, recognizing that a long and fruitful customer relationship is one of our most valued assets. You must always act in good faith if you deal with our customers, by representing your products, services and capabilities accurately, by making competitive comparisons fairly, and by promising only what you can deliver ethically and legally.

B. Information Owned by Others

Hitachi Vantara and other companies are entitled to retain control of their internal information, so you must strictly observe all known limitations on the acquisition, use, copying and distribution of information or materials that come into your possession. Additionally, you should at the very least assume that markings such as “Confidential”, “Proprietary”, “Restricted Distribution” and “Internal Use Only” mean that the materials should not be used or distributed without prior written authorization from their owner. Even when materials aren’t specifically marked, if you have any reason to believe that they may be confidential, you must treat them as such or take steps to verify that they are not in fact confidential.

C. Fraud

Hitachi Vantara does not tolerate **Fraud** and we encourage you to be alert to any irregularities that might indicate Fraud.

*Meaning of **Fraud**:* The intentional misrepresentation or concealment of a material fact, to induce someone to act on it to their detriment. Examples of Fraud include: false expense reports; forged or altered checks; misappropriated company assets; unauthorized handling or reporting of transactions; or inflated sales numbers.

D. Compliance with Anti-Bribery and Anti-Corruption Laws

Hitachi Vantara complies with anti-corruption laws wherever it does business and prohibits any use of a **Bribe**. In particular, we scrutinize gifts, travel and entertainment, whether given or received, as these are known corruption risk areas.

You must avoid engaging in anything that constitutes or appears to constitute a Bribe and you must take particular care when dealing with **Public Officials**. Non-compliance may lead to fines and prison terms, as well as putting export privileges at risk.

In addition, Hitachi Vantara does not allow facilitation or “grease” payments to be made, even if they are legal or culturally acceptable in some countries. They may in rare instances be permitted, when there is an immediate threat to personal safety, security or freedom.

*Meaning of **Bribe**:* Anything of value that is offered, promised or given to anyone, directly or indirectly, with the intent to obtain or retain business, or otherwise to gain an improper advantage.

*Meaning of **Public Officials**:*

- Officers or employees of a government, government-owned enterprise, agency or regulatory authority
- Political candidates or political party members
- Public Officials representing a commercial enterprise
- Officials or employees of a public international organization (e.g. United Nations, International Olympic Committee, World Bank)
- Immediate family of Public Officials
- Active/reserve members of police and armed forces
- Educational and medical employees of state-owned entities, including professors and doctors
- State-controlled media representatives and journalists
- Members of ruling or royal families

E. Export Laws

Hitachi Vantara knows that exporting is a privilege, not a right, and that loss of export privileges would severely impact our business. Through our Global Trade Compliance Department (“GTCD”), we comply with export laws and regulations everywhere we do business and we require the same of every Hitachi Vantara Partner. Export laws and regulations cover not only physical shipments but also:

- Transfers of technology via Internet
- Development and delivery of applications
- E-business and e-services
- Foreign travel with products or technology
- Technical specifications and performance requirements given to suppliers for procurement from foreign sources
- Use of personal knowledge abroad, such as technical assistance
- Release of technology, source code or downloadable software in the U.S. to anyone who is not a U.S. citizen or lawful U.S. permanent resident (known as a “deemed export”)

Certain countries are embargoed and/or sanctioned for Hitachi Vantara export shipments, so you must contact GTCD before considering any export or deemed export of Hitachi Vantara products, services, solutions, technology, technical data or information.

F. Anti-Boycott

Hitachi Vantara is prohibited from complying with one country's **Boycott** of another country, when that Boycott is not sanctioned by the United States. You must therefore report promptly to GTCD any request to comply with a Boycott or to supply information concerning a Boycott of any country.

*Meaning of **Boycott**:* Abstaining or agreeing to abstain from reporting business dealings with, or doing business with, a blacklisted person, organization or country, or agreeing to provide information about a person's race, religion or national origin in the context of such business dealings.

G. Accounting and Financial Reporting Laws

Hitachi Vantara follows strict accounting principles and we place a high value on the integrity and accuracy of our record-keeping. As a result, we expect you to report financial information, including expense reports, accurately and completely and to use appropriate internal controls and processes to ensure that accounting and financial reporting comply with the law.

HITACHI VANTARA ASSETS

You must take all reasonable care to ensure the integrity and security of Hitachi Vantara's business assets, both tangible (physical property, equipment and documents) and intangible (information, software, data, intellectual property and goodwill). In particular, all Hitachi Vantara internal information and documents are confidential, unless they are specifically intended for release outside Hitachi Vantara, and they should not be shared with anyone who does not have a need to know. If you cease to be a Hitachi Vantara Partner, you must still follow this requirement concerning our confidential information.

You are also required to comply with policies, guidance or instructions issued by Hitachi Vantara's Chief Information Officer, Chief Information Security Officer, or authorized members of the Hitachi Vantara IT Department ("IT"), with respect to the preservation of the confidentiality, integrity and availability of information, such as how to avoid data breaches, phishing schemes or hacks. If you learn of any theft, misuse, wrongful disclosure or other risk to Hitachi Vantara information, you must promptly notify IT.

DATA PROTECTION

Hitachi Vantara complies with laws concerning **Data Protection** in all countries in which we do business and we take particular care when transmitting **Personal Information** across international borders. You must confirm that proper authorization has been obtained, before you collect, store, use, process, transmit or disclose any Personal Information of Hitachi Vantara employees, or of employees of our sales prospects, customers or any Hitachi Vantara Partner.

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Meaning of *Data Protection*: The process of safeguarding the privacy of Personal Information and other data, in order to comply with laws and regulations that control their collection, storage, use, processing, transmission and disclosure.

Meaning of *Personal Information*: Any information by which a person can be individually identified, including information relating to employment, compensation, medical records and benefits.

CONFLICTS OF INTEREST

You must avoid situations in which there is a potential for conflict between your interests and your obligations to Hitachi Vantara. You may not evade these requirements by acting indirectly through anyone else.

REPORTING VIOLATIONS

If you have an ethics question, send an email to ethics@hitachivantara.com.

If you think that you have come across an actual or potential violation of the Partner Code, you must either:

Call 1-877-437-ETHX (3849) in the U.S. or Canada

International phone numbers can be found at:

<https://hitachivantara.com/hotline>.

Or you may report online at:

<https://hitachivantara.com/hotline>.

NOTE: In either case, you may give your name or remain anonymous.

And always remember: **Hitachi Vantara prohibits harassment of or discrimination or retaliation against anyone who:**

- **Seeks guidance concerning the Partner Code**
- **Reports in good faith an actual or suspected violation to Hitachi Vantara or to any government or law enforcement agency**
- **Refuses to participate in a breach of the Partner Code**
- **Cooperates with an investigation of a violation of the Partner Code**