



Ivanti Channel Partner Code of Business Conduct

Date April 12, 2021

1. Introduction

Ivanti has a long-standing reputation for integrity and trustworthiness among its customers and this reputation depends upon the way in which Ivanti conducts its business and its commitment to corporate social responsibility. As a well-respected security focused organization, Ivanti's actions must be above reproach to maintain the confidence of its customers and to avoid damage to its reputation.

Commitment to ethical business practices is a core value for Ivanti and this Channel Partner Code of Business Conduct (the "Code") is designed to ensure that all of Ivanti's Channel Partners have a clear understanding of how Ivanti expects to conduct its business with its Channel Partners.

Ivanti expects all Channel Partners to fully comply with all of the principles and processes in the Code. All of Ivanti's Channel Partners must carefully review the commitments in this Code and agree to abide by the commitments as a condition of doing business with Ivanti.

2. Channel Partner Code of Business Conduct

This section sets out Ivanti's specific expectations and requirements regarding the workplace standards and business practices of its Channel Partners. These expectations are consistent with the Ivanti's values, principles and policies regarding ethical business conduct. Ivanti will seek to identify and engage suppliers who conduct their business based on a set of ethical standards compatible with its own. Ivanti will not knowingly do business with Channel Partners who do not meet the standards outlined in this Code.

a. Conflicts of Interest

Channel Partners shall avoid actual or apparent conflicts of interest by disclosing actual or potential conflicts honestly and promptly prior to making any decision and ensuring that their employees (nor employee's family members) do not make personal investments in companies that have a business connection with Ivanti.

b. Compliance with Laws

Channel Partners will comply with all applicable laws and regulations, whether domestic or foreign, which govern the conduct of their businesses.

c. Employment and Wages

Channel Partners will employ employees who are, in all cases: present voluntarily, not put at risk of physical harm due to their work environment, fairly compensated and allowed the lawful right of free association. Channel Partners will, at a minimum, provide wages and benefits that comply with the laws of their country of operation.

d. Working Hours

Channel Partners will not exceed prevailing local work hours except where workers are appropriately compensated for overtime. Channel Partners should use less than sixty-hour work weeks and allow employees at least one day off in seven days, or equivalent leave privileges.

e. Anti-Slavery and Human Trafficking

Channel Partners prohibit slavery and human trafficking, this includes, but is not limited to (i) engaging in any form of human trafficking; (ii) using forced labor for any type of work; (iii) using child labor; (iv) procuring commercial sex acts; (v) denying an individual access to his/her identity or immigration documents, such as drivers' licenses, visas, or passports, regardless of issuing authority; denying access includes, but is not limited to, destroying, confiscating, and concealing; (vi) using misleading or fraudulent information when recruiting potential candidates, or in the process of an official offer of employment, contract, full-time, or otherwise; this includes, but is not limited to, using a language the potential employee is unfamiliar with, making material misrepresentations regarding key terms and conditions (e.g., wages, location of work, nature of work), or withholding any information regarding key terms and conditions; (vii) charging applicants or potential candidates any application or recruitment fee; (viii) using recruiters that are not compliant with the labor laws of the country they are recruiting in; (ix) when required by law or contract, failing to provide or pay for transportation; (x) when required by law or contract, failing to provide or arrange housing that follows the housing and safety standards of the correlating country; and (xi) when required by law or contract, failing to provide in writing a recruitment agreement, employment contract, or other necessary work documents.

f. Discrimination/Human Rights

Channel Partners must not discriminate against their employees in hiring practices or any other term or condition of work (other than legitimate occupational requirements allowed by law) on the basis of race, ancestry, place of origin, color, ethnic origin, citizenship, religion, faith, political opinion, sex, sexual orientation, age, marital status, same-sex partnership status, family status or disability.

g. Workplace Environment

Channel Partners will provide their employees with a safe and healthy working environment consistent with all applicable laws and regulations and shall not use corporal punishment or other forms of mental or physical coercion.

h. Environmental Protection

Channel Partners will comply with all applicable environmental laws and regulations in their country and all applicable Ivanti environmental policies.

i. Confidentiality and Privacy

Channel Partners will not disclose to others or use for their own purposes or the purposes of others any trade secrets, confidential information, knowledge, designs, data, skill, or any other information which Ivanti identifies to the Channel Partner as confidential or if such information by its nature should reasonably be understood by the Channel Partner to be confidential. In accordance with the intent of Ivanti's Privacy Policy (<https://www.ivanti.com/company/legal/privacy-policy>), Channel Partners will respect the privacy of personal data they collect, use or disclose as a consequence of their business relationship with Ivanti.

j. Protection and Responsible Use of Customer Data

Channel Partners shall protect the personal and sensitive data of Ivanti's customers, employees and other persons obtained during Channel Partner's business activities by: (i) processing personal data lawfully, fairly and in a transparent manner; (ii) collecting personal data for specified, explicit and legitimate purposes and not processing it in a way that would be unlawful or incompatible with those purposes; (iii) having adequate security procedures and policies designed to protect personal data from loss, unauthorized use or disclosure; (iv) collecting accurate personal data and, where necessary, keeping it up to date; (v) collecting only the type(s) and amount of personal data that is relevant and required for the business relationship and services being provided; (vi) not keeping personal data longer than is necessary for the purpose for which the data was collected; (vii) respecting procedures to ensure prompt responses to enquiries from customers regarding their data; (viii) not selling customers data; (ix) organizing appropriate data protection training for their employees, agents and contractors; and (x) immediately informing Ivanti of any security breach involving a loss of personal data.

k. Bribery, Corruption and Unlawful Payments

Channel Partners shall be knowledgeable about and adopt local anti-bribery & corruption policies. Channel Partner shall never offer a gift that affects or appears to affect the impartiality of the person who receives it and shall apply local prior pre-approval procedures before offering or accepting a gift, entertainment or hospitality. Channel Partners shall not give a payment or a gratuity to government officials or employees to expedite a routine administrative action or make any contributions, whether financial or in kind, to political parties or organizations, or to individual politicians (where it is legal to do so) on behalf of Ivanti without pre-approval from Ivanti.

l. Insurance

To ensure the protection of Ivanti's customers and business, Channel Partners shall maintain appropriate insurance coverage as required by Ivanti, and as updated from time to time, for the duration of the business relationship with Ivanti.

m. Anti-Money Laundering

Channel Partners shall take all necessary steps prevent and detect any money laundering and terrorism financing by understanding and complying with all applicable laws and regulations, such as Title III of the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (the "USA Patriot Act").

3. Assessment and Monitoring

Ivanti reserves the right to assess and monitor on an ongoing basis a Channel Partner's practices regarding this Code. Assessments may include a review of relevant Channel Partner records as well as inspection of Channel Partner facilities for compliance with this Code. Ivanti will determine the frequency and extent of the assessments and ongoing monitoring. Consistent with standard industry practice, all costs associated with the

assessments and ongoing monitoring will be borne solely by Channel Partner. Channel Partner will allow Ivanti and/or any of its representatives reasonable and timely access to Channel Partner's facilities and to Channel Partner's relevant records at all times.

4. Enforcement

Channel Partners who do not meet the requirements of this Code may, where considered appropriate by Ivanti, be provided with the opportunity to bring their business into compliance with this Code within a reasonable time frame determined by Ivanti. Ivanti reserves the right to terminate its business relationship, including any and all agreements between Ivanti and a Channel Partner, with any Channel Partner who fails to comply with this Code.

5. Reporting and Addressing Code Violations

Any person who believes that a violation of this Code has occurred, is asked to report the relevant information in confidence to the Ivanti Business Conduct Web Reporting Portal at <https://secure.ethicspoint.com/domain/media/en/gui/49468/index.html>.

Ivanti will make every effort to investigate all reported violations in a discreet, fair and confidential manner and will take appropriate action to maintain the integrity of its business.