

Business Ethics Policy

Purpose

Crownpeak is committed to conducting business with integrity, transparency, and respect for all stakeholders. This policy outlines the ethical principles that guide our employees, contractors, and partners in their professional conduct.

Scope

This policy applies to all employees, officers, directors, contractors, and third-party partners globally.

Core Principles

- **Integrity:** Act honestly and uphold the highest ethical standards in all business dealings.
- **Compliance:** Adhere to all applicable laws, regulations, and company policies, including GDPR, CCPA, and other data protection laws.
- **Respect:** Treat colleagues, customers, and partners with dignity, fairness, and respect.
- **Accountability:** Take responsibility for actions and decisions, ensuring they align with Crownpeak's values.

Key Areas of Ethical Conduct

- **Conflicts of Interest:** Avoid situations where personal interests conflict with company interests. Disclose any potential conflicts to management.
- **Confidentiality:** Protect sensitive company, customer, and partner information. Do not disclose confidential information without proper authorization.
- **Anti-Bribery and Corruption:** Do not offer, accept, or solicit bribes or improper payments. Follow all anti-corruption laws, including the FCPA and UK Bribery Act.
- **Fair Competition:** Compete fairly and comply with antitrust and competition laws. Avoid practices that unfairly limit competition.
- **Data Privacy:** Safeguard personal data and comply with all applicable data protection laws, including GDPR and CCPA.
- **Workplace Conduct:** Foster a safe, inclusive, and harassment-free workplace. Report any discrimination, harassment, or unsafe practices.
- **Environmental Responsibility:** Conduct business in an environmentally sustainable manner, minimizing harm to the environment.



Other Key Policies in the Employee Handbook

- **Employee Code of Conduct**
- **Conflict of Interest**
- **Whistleblowing**
- **Corporate and Social Responsibility**

Reporting Violations

Employees and partners are encouraged to report any suspected violations of this policy through the company's reporting channels. Reports can be made anonymously and without fear of retaliation. Crownpeak has a whistleblowing policy, which outlines our duty to protect and support employees who raise legitimate concerns over illegal or unethical behavior.

Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment or contracts.

Review and Updates

This policy will be reviewed annually and updated as necessary to reflect changes in laws, regulations, or company practices.