



Code of Conduct



Here at Convergent, our positive culture is what truly makes us different. Through living by our guiding Values and Beliefs, we can truly make a daily difference in all that we do. We embody fairness, honesty, and good business ethics in all transactions. We care about our colleagues, our customers, our partners, and our communities. These principles are not just words on a sheet of paper. For us, culture is a strategy that empowers our colleagues to make good decisions.

Each of our Values and Beliefs holds significant meaning, but I'd like to point to one in particular: I have integrity—it's what I do when no one's watching.

This Code of Conduct reflects the way our company runs and defines the way our colleagues should operate. It is a global guide on conducting business within Convergent. It communicates a vision of who we are, how we work, and what we believe.

The Code is a tool that will support you in helping you make the right ethical decisions, but we encourage you to speak up if you have a question or concern, or if you are unsure of what to do in any given situation. It is up to all Convergent colleagues to uphold the Code of Conduct in alignment with our Values and Beliefs.

Know the Code, speak up if you see a concern, and remember that all of us are called to embody Value and Belief #3: **I have integrity.**

Ken Lochiatto
CEO Convergent

A handwritten signature in dark ink, appearing to read 'Ken L. Lochiatto'.

convergint | V's & B's

I am Convergint

- I own my position on the team

I am accountable for my continuous development

- A better me is a better Convergint

I have integrity

- It's what i do when no one's watching

I keep everyone informed

- Communicate, communicate, communicate

I make responsible decisions

- Timely, educated, and cost-effective

We expect to be our customers' best service provider

- No matter what business we are in

We deliver results

- Period

We believe in balanced lives

- Family, business, community

We embrace a safe, inclusive, and positive work environment

- Every colleague makes a difference

We promote fun and laughter on a daily basis

- Committed to fun since 2001



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Reporting Concerns

If you become aware of a situation that may involve a violation of our code of conduct, company policies or applicable law or regulation, you have a duty to report it.

You can report to:

- Your supervisor, or your supervisor's direct supervisor;
- A member of the human resources organization;
- An attorney in the legal department or the general counsel;
- Reportit, an independent third-party ethics & compliance hotline
 - 1-877-778-5463 and/or www.reportit.net.
 - If you report online, use the username:
Convergint and password: hr123.

If you are aware of or confronted by a situation within the workplace that raises concern about illegal or unethical behavior, we first encourage you to report your concern to your supervisor. If you are uncomfortable voicing your concern to your supervisor, we encourage you to report your concern to your supervisor's supervisor, a member of Human Resources, or an attorney in the Legal Department. You also can raise your concern to Report It, an independent, third party hotline and website that provides a simple way to anonymously and confidentially report activities. Providing as much information as possible will help the Company review the report and investigate any potential misconduct. While we understand that the colleague may feel comfortable reporting an anonymous report this also will impact the Company's ability to conduct an investigation.

If you feel there is a need to report a concern to a representative of the Board, the appropriate contact information may be obtained from the Vice President Human Resources.

The Company representative receiving the concern will acknowledge the report within five (5) business days or as soon as practicable, unless such report was submitted anonymously. Convergint will treat all reports confidentially to the extent possible and consistent with applicable law.

Convergint strictly prohibits retaliation against anyone who reports in good faith or participates in an investigation of a possible violation of our Code of Conduct, Company policies, or applicable law or regulations.

I am
conver^gint[®]



Everyone can make a difference. I own my position.

The Code of Conduct (“the Code”) applies to everyone who works at Convergent, including any officers, agents, contractors or consultants. It is your responsibility to follow the Code of Conduct and to understand how it relates to your job responsibilities.

Each Colleague is a critical component of Convergent. You are expected to own your position on the team. This means that you do what you say you’re going to do and that you do the right thing. You are committed to Convergent’s mission at all times.

The Code cannot specifically address every potential business scenario or ethical dilemma that you may encounter, but that does not relieve you of your responsibility to do the right thing. When you are uncertain of what action to take, the Code provides guidance and resources to assist you in choosing the proper course. You must always comply with the spirit as well as the letter of the Code. (VB #3- I have integrity. It’s what I do when no one is watching).

You should understand that individuals who violate the Code — including individuals who fail to exercise proper supervision and oversight to detect and report a violation by colleagues they supervise — may be subject to disciplinary action up to and including termination. Reports of violations will be investigated in a respectful, professional manner and as promptly as possible.

All Colleagues are responsible for preventing violations of law and for raising concerns where we see potential issues. Each person can

make a daily difference. Colleagues should discuss their concern with their immediate supervisor. If a Colleague feels uncomfortable speaking with their supervisor, concerns may be reported to the following:

- Their supervisor’s direct supervisor;
- A member of the Human Resources Organization;
- An attorney in the Legal Department or the General Counsel;
- ReportIt, an independent, third party Ethics & Compliance Hotline at 1-877-778-5463 and/or www.reportit.net. If you report online, use the username: Convergent and password: hr123

While the Code applies equally to all, colleagues in a leadership role have additional responsibilities. If you are a leader, you have an incredible opportunity to set the right tone for your team, including by doing the following:

- Lead by example and live the Convergent values and beliefs;
- Speak up when you see a problem and encourage others to do the same;
- Make sure your direct reports understand what is expected of them;
- Be receptive to questions and concerns, and make sure the issues are directed to people who can help; and
- Escalate matters that may indicate a violation of the Code to the appropriate department.

All reports should be made in good faith with a reasonable basis to believe that the report is true. While reporting concerns is encouraged, intentionally filing a false report may result in disciplinary action, including termination.

Colleagues have a duty to cooperate with Company investigations. Failure to cooperate fully in a Company investigation or failure to be fully truthful when providing evidence or testimony in such investigation may grounds for disciplinary action, including termination. Appropriate corrective or disciplinary action will be taken if warranted by the investigation.

No Retaliation

Convergent is committed to non-retaliation. In order to operate effectively, it is vital for all Colleagues to trust and respect each other. Convergent strictly prohibits retaliation against anyone for making a report in good faith or participating in an investigation of a possible violation of our Code of Conduct, Company policies, or applicable law or regulations. The Company will take disciplinary action, up to and including termination of any individual who retaliates against another for engaging in any of these activities.

External Communications

Convergent wants to ensure that we provide truthful, accurate information to the news media, general public, and others who have an interest in our activities. External communications must demonstrate the same sense of responsibility that our internal communications do. You should speak on behalf of Convergent only if you are authorized to do so. All inquiries from the news media requesting a response from Convergent should be directed to the Marketing Department.



I am accountable
for my **continuous**
development

converⁱnt®



A better me is a better Convergent.

Colleagues are expected to understand and comply with these laws and regulations as well as Company policies that apply to our job functions and locations where we operate. If you are unsure whether a contemplated action is permitted by law, the Code, or Company policy, you should seek advice by contacting your supervisor, your Regional Human Resource Business Partner or a member of the Legal Department.

Colleagues are required to participate in ethics and compliance training to continually improve their knowledge and understanding of the applicable legal and ethical requirements and the Company's compliance expectations.

Inclusion and Diversity Policy

Convergent believes in treating all people with respect and dignity. We strive to create and foster a supportive and understanding environment in which all individuals realize their maximum potential within the company, regardless of their differences. We are committed to employing the best colleagues to be our customer's best service provider. We recognize the importance of reflecting the diversity of our customers and markets in our workforce. The diverse capabilities that reside within our talented workforce, positions Convergent to anticipate and fulfill the needs of our diverse customers, providing the highest quality services. We believe that the wide array of perspectives that results from diversity promotes innovation and business success. Managing diversity makes us more creative, flexible, productive and competitive.

It is Convergent's aim to ensure all colleagues and job applicants are given equal opportunity and that our organization is representative of all sections of society. Each colleague will be respected and valued and able to give his or her best as a result. Convergent is committed to providing equality and fairness to all and to not provide less favorable facilities or treatment on any grounds. V&B 9- We embrace a safe, inclusive, and positive work environment.

Supporting Policies:

- Inclusion and Diversity Policy



I have
integrity

conver^gint[®]



It's what I do when no one is watching.

We embody fairness, honesty, and good business ethics in all transactions. This means that you do the right thing when no one is watching. It is important that you understand your legal and ethical responsibilities when performing your role for the Company.

As a global company, we are subject to an increasing number of laws and regulations and must comply with all laws and regulations applicable in each country where Convergint conducts business. This includes the laws and regulations related to trade and other sanctions, customs regulations, import and export controls, and prohibitions against bribery, corruption and other unethical business practices.

We expect all of our colleagues and Business Partners comply with all applicable laws and regulations. Violating any laws or regulations the Company is subject to may have severe consequences for the Company and the individuals involved.

Conflicts of Interest

Colleagues have an obligation to conduct business within guidelines that prohibit actual or potential **conflicts of interest**.

What is a Conflict of Interest?

An actual or potential conflict of interest occurs when a colleague's personal interests or opportunity for personal gain conflicts or interferes with Convergint's best interests. Conflicts of interest can arise from personal relationships or from outside business activities.

Q: I have an opportunity to obtain a sales account from a new customer that would involve a family member as the lead business contact. Can I handle this account?

A. Maybe. Always notify your supervisor or the individual responsible for making pricing decisions of any close relationship you have with vendor or customer. You will need to disclose and seek review of this potential conflict of interest with the Legal Department at compliance@convergint.com. Each situation will be reviewed on a case by case basis.

All Colleagues owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Colleagues shall not use Company property or information for personal gain or personally take for themselves any opportunity that is discovered through their position with Convergint. **Avoid even the appearance of a conflict of interest.**

There are numerous situations where a conflict of interest could arise. An obvious example is where a Colleague or close family member is also acting as a consultant to a competitor, supplier or contractor of the Company. Another example is where a Colleague owns or has a substantial interest in a competitor, supplier or contractor. A conflict may also arise if a Colleague serves as a board member for an outside commercial company or organization.

Determining whether there is an actual or potential conflict of interest can be complicated. When colleagues are open about potential conflicts, it is easier to find a way to minimize the problems. Colleagues with questions about a potential conflict of interest should seek advice from their supervisor, their Human Resources Representative, or a member of the Legal Department.

Insider Trading

Colleagues are strictly prohibited from trading in securities of any of Convergent's customers or suppliers while in possession of **material, non-public** information concerning such customer or supplier. These acts are generally known as **"Insider Trading."** Colleagues also are prohibited from disclosing material, non-public information about Convergent's customers or suppliers to others.

Information is "material" if there is a substantial likelihood that a reasonable investor would consider it important or it could affect someone's decision to buy, hold, or sell a company's securities. Information is "non-public" if it has not been widely disseminated to the public.

These prohibitions apply to all Colleagues as well as any entities controlled by them, family members or others who reside with them, investment accounts over which they have control, such as retirement plans and custodial accounts.

Q. During one of business meetings, I learned that one of our vendors is about to announce a breakthrough that would greatly increase the value of its stock. May I purchase shares of stock before the news is public?

A. No. 1) This could be a conflict of interest as you are using information due to your relationship with Convergent for your personal benefit and 2) this information could be considered insider trading, which is illegal.

Outside Employment ("Moonlighting")

The Company has no objection to Colleagues accepting a second job except in cases where: (i) it has a negative effect on a Colleague's ability to satisfy their responsibilities at the Company (ii) is in competition with the Company's business; or (iii) involves the use of confidential Company information. Colleagues should disclose any second job with their supervisor to determine whether there is a possibility for a conflict of interest or a breach of confidentiality. This also means you cannot use any Convergent resources such as your computer, phone, printer, or work time. If you have any questions, please reach out to the Legal Department at compliance@convergent.com.

If it is determined that a Colleague's outside work conflicts or interferes with performance, safety or the ability to meet the requirements of the Company, the Colleague may be asked to terminate the outside employment if he or she desires to remain employed with the Company.

I keep
everyone
informed

converⁱnt®



Communicate. Communicate. Communicate.

Effective communication with our Colleagues, partners, suppliers, and customers is a key part of our success as a Company. Communication is also a critical component of our Code of Conduct. Speak up when you see a problem and encourage others to do the same. Colleagues are encouraged to talk to their supervisor, their Human Resources Business Partner, or a member of the Legal Department about any questions or concerns regarding our Code of Conduct.

Leaders and supervisors have additional responsibilities of creating an open and supportive environment where Colleagues feel comfortable asking questions and raising concerns. Make sure that issues are directed to people who can help. Escalate matters that may indicate violation of the Code or Company policy to Human Resources or the Legal Department.



I make
responsible
decisions

conver^gint®



Timely, educated, and cost-effective.

Colleagues are expected to protect the safety of one another and the financial assets of the Company. Colleagues must follow acceptable business principles in matters of conduct and exhibit a high degree of integrity at all times. Colleagues make responsible decisions that support teamwork and professionalism companywide.

Health and Safety and Professional Conduct

I protect my own safety, my customers, and my fellow colleagues.

Convergent is a drug-free workplace and is committed to providing the safest work environment possible. We are committed to providing the tools, training, and programs so that all projects and service calls are completed without incidents or injuries. To support this culture and increase safety awareness between all Colleagues, there is a dedicated Safety Coordinator in each office under the direction of the National Safety Officer. Convergent's workplace health and safety program includes written policies, project specific activity plans, resources, training programs and regular meetings.

Each Colleague also has a responsibility for maintaining a safe and healthy workplace for all Colleagues by following the Company's environmental, safety and health rules and practices. This includes reporting all accidents, injuries and unsafe equipment, practices or conditions.

The Company further expects all Colleagues to follow all applicable environmental laws and regulations. If a Colleague is uncertain about his or her responsibility or obligation, the Colleague should consult with his or her supervisor or location leader.

Equally important as safety are inclusivity and positivity. (V&B 9- We embrace a safe, inclusive, and positive work environment.) We know that every colleague can make a difference.

Colleagues are encouraged to bring their disputes or differences with other colleagues to the attention of leadership before the situation escalates into potential violence. Threats, acts of violence and physical intimidation committed by or against Colleagues, customers, suppliers, or members of the public are strictly prohibited. Colleagues must assume that any threat or instance of violence is serious and report it. This includes threats by Colleagues, as well as threats by customers, suppliers, or other members of the public.

Policies:

- **Drug-Free Workplace Policy**
- **Inclusion and Diversity Policy**
- **Employee Handbook**

Personal Data

We respect and value the privacy of our Colleagues, suppliers, partners, and customers. This means that you must treat and protect all personal data with care and respect, while only using such data for legitimate and authorized purposes. Personal information is any information that directly or indirectly identifies and describes an individual. Colleagues must guard against inappropriate access and disclosure of personal data and use security safeguards that are appropriate to the sensitivity of such data. All personal data must be kept in accordance with all applicable laws and privacy policies. Any failure to comply with those laws could result in fines, penalties, lawsuits or other sanctions against Convergent or our colleagues.

If you're in doubt about how to handle personal information, please contact the Legal Department. Immediately report any known or suspected unauthorized use or disclosure of personal information. If a data breach or security incident is suspected following information technology, the Colleague must immediately contact the IT help desk.

Policies:

- **Personal Information Protection Policy**

Protection and Proper Use of Company Assets

All Colleagues should protect Convergent's assets and ensure their efficient use and for legitimate Company purposes. Theft, carelessness, and waste of Convergent's assets have a direct impact on the Company's profitability. Colleagues must immediately report any suspected incident of fraud or theft to their supervisor or Regional Human Resource Business Partner for investigation.

Confidential and Proprietary Information

Information is a valuable asset. Do not disclose confidential information to anyone outside Convergent, and do not discuss it with Convergent Colleagues who do not have a business need to know the information. All Colleagues have a continuing obligation to adhere to the requirements of their signed Colleague Agreement. This includes the obligation to protect the confidential and proprietary information of Convergent, its customers, and suppliers, except where disclosure is required by laws or regulations ("Confidential and Proprietary Information"). The obligation to preserve Confidential and Proprietary Information continues even after employment ends. This also means that we respect others' confidential information and do not bring any material from prior employers to Convergent.

What is Confidential and Proprietary Information?

Any information or material not generally available to the public that relates to a company's business, customers, suppliers or business partners. It also includes all non-public information that might be of use to competitors or harmful to Convergent or its customers or suppliers if disclosed.

This includes but is not limited to:

- Confidential supplier, partner or customer information
- Intellectual property (trade secrets, patents, trademarks, and copyrights)
- Contract terms or conditions
- Pricing or target margins
- Business, marketing and service plans
- Engineering designs
- Databases, records
- Finance data and reports

When you receive Confidential and Proprietary Information (including personal data) from a client, business partner, supplier or others, make sure you understand our legal, contract and policy obligations and follow them. If you are unsure if the information is confidential, treat it as such and seek advice from a member of the Legal Department.

We are individually and collectively responsible for reducing our information security risk—which includes protecting devices, as well as data and information. If you don't know whether a particular action presents an information security risk, reach out for guidance before doing it. Secure your laptop, phone or documents that contain Confidential and Proprietary Information.

If a Colleague loses Confidential and Proprietary information (including in cases where it is stored on a phone or laptop, for example), they must report such loss immediately to their supervisor and the IT Help Desk if information technology is involved. Unauthorized use or distribution of Confidential and Proprietary Information is a violation of Company policy, which may result in disciplinary action including termination. This includes the unauthorized disclosure of confidential information through any form of social media, such as blogs, networking sites, or discussion forums.

For detailed information about how to protect information and your specific responsibilities, see

- **Cyber Security Policy**
- **Data Handling Policy**
- **Asset Management Policy**
- **Customer Network Access Policy**
- **Information Security Policy**
- **Social Media Policy**

Record-Keeping, Financial Controls and Disclosures

The Company requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions. All business expense accounts and time sheets must be documented and recorded accurately in a timely manner. If a Colleague is unsure whether a certain expense is legitimate, the Colleague should consult their supervisor. Policy guidelines are available from Convergent's Chief Accounting Officer. Submitting false, inaccurate or fraudulent expenses, time sheets, doctor's notes, health documentation or other business records is a serious violation of Company policy and may result in disciplinary action, including termination.

It is our policy and practice to properly compensate Colleagues for all time worked and to ensure no improper deduction is made from a Colleague's pay.

To that end, Colleagues must review each paycheck promptly to identify and report any errors or discrepancies. We make every effort to ensure our Colleagues are paid correctly. When mistakes do happen and are called to our attention, we will promptly investigate and make any necessary correction.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, must be promptly disclosed in accordance with any applicable laws or regulations and must conform both to applicable legal requirements and to the Company's system of internal controls. Records should be retained or destroyed according to the Company's record retention policies.

Financial Reporting

It is critical that the Company's filings and other legally mandated reports, including those with the applicable taxing authorities, be accurate and timely. The Company expects Colleagues to take this responsibility very seriously and provide prompt and accurate answers to inquiries related to the Company's disclosure requirements.

Convergent complies with all financial reporting and accounting regulations applicable to the Company. If any Colleague has concerns or complaints regarding accounting or auditing matters of the Company, then he or she is encouraged to submit those concerns to the Company's President or through the communication channels detailed in the Reporting Section.

Political Contributions

Colleagues may use their own personal funds and time to support their charities and candidates of their choice, but cannot use Convergent resources or name unless approved in advance by the CEO.

We expect
to be our
customers'
**best service
provider**

convergent[®]



No matter what business we're in.

In all areas of our business, we expect to be our customers' best service provider. A core element of our performance is engaging in business practices that are law-abiding, fair and honest.

Fair and Honest Competition

In the marketplace, Convergent seeks to outperform its competition fairly and honestly. The Company seeks competitive advantages through superior performance, and never through unethical or illegal business practices. Each Colleague must respect the rights of and deal fairly with the Company's customers, suppliers and competitors. No Colleague should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

Convergent complies with all applicable competition laws (known in the U.S. as antitrust laws). Generally, these laws prohibit the discussion of topics with competitors that may restrain trade. Accordingly, no Colleague is permitted to conduct such discussion with competitors or otherwise engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities. Competition laws also prohibit informal or formal agreements with third parties that may restrict competition. Examples of prohibited agreements include fixing resale prices, allocating markets, customers or territories, refusals to buy from or sell to specific parties, or being asked to support an illegal boycott. No Colleague is permitted to enter into (or discuss) these types of agreements with third parties. Keep in mind that agreements do not have to be signed contracts to be illegal.

An informal understanding between you and a competitor, or even a conversation that implies an understanding, may be a problem. If any of these topics come up while you are talking with a competitor, stop the conversation immediately and report it to the Legal Department.

Anti-Corruption and Anti-Bribery

The rule is simple: Don't bribe anybody, anytime, for any reason. Don't ask for or accept any bribe in connection with your work for Convergent.

The Company has zero tolerance for offering or paying bribes, improper payments or things of value to win business or obtain an unfair advantage, no matter where we are doing business. The Company also has zero tolerance for any Colleague who requests or receives any such improper payment in connection with their work for Convergent (e.g. kickbacks from suppliers).

Offering, paying, accepting, or soliciting bribes may violate the ever-increasing global anti-corruption laws, including the US Foreign Corrupt Practices Act and the UK Bribery Act and expose the Company to serve penalties and the loss of future contracts. These are criminal offences and may result in fines or prison sentences for those engaged in such practices. Anti-corruption laws apply to activities outside the respective countries' borders, and apply wherever and whenever the Company does business.

Dealing with Third Parties

Convergent expects all of our Colleagues, as well as others engaged to act on behalf of the Company (including but not limited to joint venture and other business partners, suppliers, agents, distributors and consultants), to conduct business affairs with integrity, free of bribery and corruption, and in compliance with applicable laws at all times. This means that arrangements should not be entered into with any business partner (providing goods and services to or on behalf of the Company) without first assessing the corruption risk of the engagement and conducting appropriate due diligence on the business partner. Once engaged business partners should be monitored to ensure they are acting ethically and compliancy and so as to be alert to any red flags. This is critical as Convergent may be held responsible for the actions of its business partners if they pay bribes on the Company's behalf, even without our knowledge.

A business partner must never be engaged, asked, or permitted to do anything that would be prohibited by this Code or by any Company policy or procedure, if such activity were undertaken by a Colleague.

Dealing with Public Officials

While corruption can occur, and is illegal, in any business transaction (including those between commercial counterparties), the risk of corruption is higher when dealing with government entities and public officials (including employees of state owned companies). Bribery of public officials is against the law in every country and carries criminal penalties for both the employee and the company.

Anti-Corruption Laws generally prohibit giving or offering **anything of value** to a public official, or another person with which the Company

does business for the corrupt purpose of improperly obtaining, maintaining or directing business to the Company. This includes, for example, payments made to improperly obtain a visa, license or permit as well as improper payments made to secure sales and contracts.

“Anything of value” is interpreted very broadly and can include entertainment, meals, travel and gifts as well as favors, offers of employment and anything else that may have a value or benefit to the recipient.



Gifts, Hospitality, Entertainment and Travel

It is Company policy to prohibit paying for entertainment, meals, travel and gifts for any of the improper purposes described above.

Paying for entertainment, meals, travel for or giving a gift is permissible, for both Public Officials and private individuals, if it is of modest value as set forth in the Anti-Corruption and Anti-Bribery Policy, a matter of simple common courtesy under local custom, incidental to legitimate and bona fide business discussions, and promotion of the Company's services, and not done for an improper purpose. Such activities may be subject to additional approvals as set out in those policies and must be accurately recorded in the Company's business and financial records.

Any questions regarding the above guidance should be directed to the Legal Department at compliance@convergent.com.

Accurate Record-Keeping

One of the most important things that you can do to protect against the risk of bribery and corruption, and to detect red flags, is to ensure that Colleagues and the Company create and maintain accurate financial and business records that properly record and support all expenses and other financial transactions of the Company. In addition, certain laws require that the Company's books and records fairly, accurately and completely reflect our transactions and activities, including the nature and purpose of the transaction or activity.

Policies:

- Global Anti-Corruption and Anti-Bribery Policy
- Employee Handbook



We
deliver
results

convergent[®]



Period.

In all aspects of our business, we deliver results. We design, install and service integrated electronic security solutions for a wide range of verticals and industries. We work with contractors and current and prospective partners and suppliers to achieve the best outcomes for our customers and to advance our mutual interests. Our primary goal is providing exemplary service to our customers. As part of Convergent's service excellence, Colleagues must comply with all standards applicable to their job duties, including laws and regulations and internal procedures and policies designed to promote quality and safety in our services. Colleagues are also expected to follow contract specifications at all times. We strive to exceed our customers' expectations for quality and reliability, every time.



We believe in
balanced lives

converⁱnt®



Family. Business. Community.

At Convergent, we believe in balanced lives for our family, business and community.

For our Colleagues and their families:

Convergent pays fair compensation across its workforce and complies with all applicable wage and hour laws. We abide by equal pay principles and strictly prohibit discrimination based on gender or any other protected category. Convergent is also proud to offer a wide variety of benefit programs and leave policies to promote healthy and balanced lives for our Colleagues and their families.

For our business:

Many of the provisions of this Code as well as other Company policies contribute to the success of our Company. We are proud of our accelerated growth and excited for our future business opportunities.

For our community:

We have created a culture of giving here at Convergent, a culture that we believe is central to our success as an organization. Not only do we give to our local communities all throughout the year, but we also take it to the next level with specific initiatives, starting with our yearly Convergent Social Responsibility Day.

Convergent Social Responsibility Day

Each June, Convergent celebrates its anniversary by supporting Convergent Social Responsibility Day. On this day, the Company closes all of its locations and Colleagues volunteer in their communities and contribute to those in need.

Colleagues are welcome to submit to their CTC leader any suggestions of organizations or charities to support. Previous examples are local food banks, park clean-ups, homeless shelters, Habitat for Humanity, local school districts and others. Convergent encourages a “pay it forward” attitude and we hope Colleague’s will embrace this concept.

Supplier Diversity Program

Convergent is committed to diversity not only within our workforce but also with our suppliers. The Company has experienced the benefit of working with locally-owned businesses in the communities in which we operate. From Convergent’s perspective, it’s a win all the way around – for our supplier’s business, for our business, and for every community of which we are a part.

Convergent also understands how difficult it can be for a small businesses to make connections within larger organizations. Convergent’s Supplier Diversity Program was designed to make it easier for diverse businesses to make contact with our North American office locations.

While Convergent is not able to do business with every company that contacts us, the Company welcomes the opportunity to build strong, rewarding relationships with high-quality, diverse suppliers and service providers in the communities that we live, work and play. Interested parties should refer to the Company’s website for additional information.

Environmental Protections and Sustainability

We believe that the protection of our environment through appropriate resource and waste management is everyone's responsibility, ours included. We strive to minimize our environmental impact in the course of business and to conserve resources whenever possible. This includes employing energy saving methods to reduce consumption and doing our best to avoid or recycle waste. Our colleagues ensure safe & efficient handling of our products, conserve, and recycle our by-products and minimize our waste. Convergent monitors our use of fuel, electrical energy, water, paper, and waste products. All work site assessment conducted by Convergent colleagues include consideration for surrounding habitat.

Colleagues are expected to follow all applicable environmental laws and regulations as well as Company policies concerning conservation measures.



We create a safe,
inclusive and **positive**
work environment

conver^gint®



Every colleague makes a difference.

Convergent strives to create and maintain a positive work environment, one that is inclusive, safe and respectful for all Colleagues. Consistent with our Values and Beliefs, Convergent and its affiliates are committed to meeting their responsibilities to respect human rights. The Company has adopted a variety of policies that address different aspects of its commitment to human rights and the fair and equitable treatment of our Colleagues and others with which it interacts.

Nothing in this Code is intended to restrict an employee's right to discuss wages and working conditions with colleagues as protected by state law, or in any way limit a colleague's rights under the National Labor Relations Act. Convergent colleagues have the right to engage in or refrain from such activities. This Code is also not intended in any way to limit a colleague's rights under any applicable law concerning whistleblowers.

Prohibition on Discrimination, Harassment or Retaliation

Convergent believes every individual should be treated with dignity and respect and work in an environment free of harassment, bullying and discrimination.

Convergent is committed to providing equal employment opportunities to all qualified applicants and employees regardless of race, color, religion, religious creed, national origin, citizenship status, ancestry, age, sex, sexual orientation, gender, gender identity or expression,

transgender status, pregnancy, childbirth or related medical conditions, marital status, order of protection status, disability (physical and mental), genetic information, uniform service member status, veteran status, political affiliation or any other basis protected by law. Convergent strictly prohibits discrimination, harassment (including sexual harassment) and retaliation based on these or any other legally protected characteristic. This applies to all phases of the employment relationship, including hiring, promotion, transfer, discipline, layoff, termination, compensation, use of facilities and selection for training or related programs.

Supporting Policies:

- **Harassment, Discrimination, and Retaliation Prevention & Investigation Policy**

Pay Transparency

Convergent will not discharge or in any other manner discriminate against Colleagues or applicants because they have inquired about, discussed, or disclosed their own pay or the pay disclosed to them by another Colleague or applicant.

Human Rights

At Convergent, we believe people can make a difference on a daily basis. Acting with integrity is at the core of Convergent's values and beliefs. Consistent with these beliefs and values, Convergent and its worldwide subsidiaries are committed to meeting their responsibilities to promote and respect human rights. Convergent contributes to the realization of human rights through compliance with laws and regulations wherever we have operations, and through our policies and practices.

Convergent's colleagues are our greatest asset. We provide an equitable, safe and supportive workplace. We value the unique contributions of our global team, enabling those who support Convergent's goals to achieve their own individual potential.

We prohibit harassment, bullying and discrimination, use of child, compulsory or forced labor, trafficking in persons and any acts associated with modern day slavery for any purpose.

We comply with all applicable wage and hour laws and regulations and provide legally-mandated benefits. We respect the right of employees to exercise their right of free association and to choose or not choose collective bargaining representation.

Supporting Policies:

- Human Rights Policy
- Supplier Code of Conduct
- Harassment, Discrimination, and Retaliation Prevention & Investigation Policy
- Inclusion and Diversity Policy



We promote **fun**
and **laughter** on
a daily basis

converⁱnt®



Committed to fun since 2001.

Convergent believes in having fun and laughter in our offices and workplace on a daily basis but not at the expense of any of our colleagues. We believe in respecting all colleagues regardless of age, race, color, religion, sex (including pregnancy and gender identity), national origin, political affiliation, sexual orientation, marital status or disability. Anyone colleague's fun and/or laughter should never come at the expense of others.





Acknowledgement (Captured through HRIS or ilearning)

By signing below, you acknowledge that you have received a copy of the Code of Conduct and understand that it is your responsibility to read and comply with the policies contained herein and any revisions made to it. This Code of Conduct should be read in conjunction with our Colleague Handbook and any state addenda, as well as any other Company policies or procedures. Furthermore, you acknowledge that you are employed “at-will” and that this Code of Conduct is not a contract of employment. Convergent reserves the unilateral right to modify, change and/or amend this Code.

Date: _____

Signed: _____

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