



Convergent Supply Chain Code of Conduct

Overview

Convergent is proud of our reputation as an honest, ethical, and responsible company. Our company's values and beliefs drive our organization, especially the value and belief, "I have integrity." Convergent has standard supply chain and procurement practices in place and relies upon each colleague to act with integrity, use good judgment, and act appropriately in any given situation. We strive to foster a culture of honesty, accountability, and compliance.

The Convergent Supply Chain Code of Conduct ("Code") aims to clarify our expectations of ethical corporate business practices for our customers and suppliers (including distributors, partners, manufacturers, third-party vendors, and contractors, collectively "suppliers"). Compliance with this Code is expected, and we reserve the right to terminate our business relationship with any customer or supplier that violates this Code. We expect suppliers retained by the supplier to adhere to this Code, whether directly or indirectly. We reserve the right to change the requirements of this Code based on changes in law or changes within our compliance program. Convergent shares with you our commitment to ethical business practices by sharing critical aspects of our compliance within this document as a guide.

Benefits & Value

As part of Convergent's commitment to ethical and responsible business practices, we are dedicated to working with our suppliers to ensure products, solutions, or services provided meet Convergent's strong ethical standards.

- **We Respect Confidentiality and the Protection of Intellectual Property** – We respect the confidential information of customers, suppliers, and competitors. We know our customers and suppliers count on us to protect and safeguard their private information. Customer and supplier records are confidential and used only for legitimate business purposes by those who need to access them. Convergent expects the same level of protection and safeguarding from our suppliers. Suppliers must respect and protect the intellectual property rights of all parties by using only legitimately acquired and licensed information technology and software and by using this only following their licenses and terms of use. Suppliers must report any suspected incident, fraud or theft of Convergent or customer data.
- **We Do Not Give or Accept Bribes** – Convergent has a zero-tolerance policy against bribery. We never authorize, offer, give, request, or accept a bribe while doing business. 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. We understand that bribes can take many forms, including cash, gifts, entertainment, charitable donations, services, personal favors, or anything else of value. 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. Our stance against bribery also extends to our suppliers. We take care to use suppliers who understand our strict policy against bribery and act consistently with our policy and applicable laws.
- **We Do Not Give or Accept Inappropriate Gifts or Entertainment** – Convergent bases business decisions on merit and selects our suppliers and business partners based on objective criteria, such as the quality and pricing of their products and services. We earn business from our customers on the same basis. We do not accept or provide gifts, favors, or entertainment if it obligates or even appears to obligate the recipient or influence a business decision. We do not request personal gifts,

favours, or entertainment, nor do we provide gifts, favours, or entertainment in response to such requests. We never accept or provide gifts of cash. We never offer a gift or entertainment that is against the law, our policy, or the policy of the recipient's company. Our stance regarding inappropriate gifts also extends to our suppliers.

- **We Comply with International Trade Laws** – As a global company, Convergent understands the multiple laws restricting the trade of certain products and services with certain embargoed or otherwise restricted countries, persons, and entities. The export control laws limit the exchange of specific technical information, including exchanges by email and/or web access. Our policy is that all import, export, and re-export of goods, services, or technology complies with applicable laws and has received all required licenses or other government authorizations.
- **We Do Not Engage in Conflicts of Interest** – A "conflict of interest" occurs when an individual's private interest interferes, or even appears to interfere, in any way with Convergent's corporate interests. Convergent officers and employees must be free of conflicting interests that might influence their decisions for Convergent. Consequently, our officers and employees are not permitted to maintain any conflict of interest with Convergent and should make every effort to avoid even the appearance of any such dispute. If there is a concern about an appearance of a conflict of interest, it must be promptly disclosed and reviewed by sending to compliance@convergent.com.
- **New Supplier Onboarding** – As a service-focused integrator, Convergent seeks to partner with respected companies that have appropriate operational and go-to-market strategies in place, and that align with our values and beliefs. Our onboarding process includes non-disclosure agreements to protect and respect privacy, particularly as it relates to confidential pricing and technology information, and a due diligence review of the supplier's financial health and the business capacity in which we will work together.
- **We Encourage and Support Supplier Engagement** – Convergent is committed to engaging with local, small and/or economically or socially disadvantaged businesses enterprises (DBEs) to ensure equal opportunity to compete in choosing the suppliers we conduct business with and working with locally owned companies in the communities we operate.
- **We Seek Ethical Sourcing Practices and Environmental Sustainability** – Convergent supports industry-wide efforts to identify, reduce, and eliminate the use of conflict minerals originating from the Democratic Republic of Congo (DRC) and adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations. We expect our suppliers to source raw materials, subcomponents, and finished goods and/or services from third parties who uphold the integrity and ethical compliance standards. Our suppliers shall drive accountability of these principles throughout their supply chain. This includes:
 - i. Ensuring that their supply chains are free from slavery, servitude, forced and compulsory labor, and human trafficking
 - ii. Develop policies and procedures to refrain from sourcing conflict minerals
 - iii. Develop compliance protocols that meet standard practices, as governed by Restriction to Hazardous Substances (RoHS) and lead-free initiatives
 - iv. Convergent partners with world-class distribution companies that have implemented due-diligence processes to meet obligations under the Dodd-Frank Act legislation
- **We Support Safe Working Conditions and Human Rights** – Environmental impacts occur in all manufacturing processes, including energy consumption, hazardous waste, and carbon emissions. Risks for the employees include the working environment and working conditions. If human rights are violated, Convergent and our customers can be impacted negatively.

Convergent expects manufacturing partners to comply with laws, regulations, and control of environmental impacts, fighting corruption while ensuring good working conditions. No form of child or compulsory labor occurs. Overtime implies a risk to employee health and a product risk regarding

quality Suppliers should seek to be International Organization for Standards (ISO) 14001 certified and have a management system following those ISO 14001 standards.

Suppliers must ensure they follow safe and environmentally friendly work practices by communicating expectations of behavior and responsibilities to all employees, including maintaining a drug-free, harassment-free, and weapon-free workplace. Suppliers shall also fully comply with applicable national, regional, and local Health and Safety regulations, laws, and practices, including those applicable to the areas of emergency preparedness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, and housing.

- **Anonymous Reporting and Non-Retaliation** – Anyone can anonymously report a violation (or potential violation) of our Supplier Code of Conduct or Code of Conduct by contacting the Convergent hotline, Report It. Report It is an independent, third party hotline that provides a simple way to anonymously and confidentially report activities. Providing as much as information as possible will help the Company review the report and investigate any potential misconduct. We do not tolerate any form of harassment or retaliation against any employee who, in good faith, reports or discloses violations of our Code of Conduct or the law or acts as a witness.
 - Call 1-877-778-5463, and tell the operator the code “Convergent”
 - To access free Report It App,
 - Text “Convergent” to 63975
 - Scan the QR code



Summary

Convergent maintains the highest standards of corporate governance and ethics while conducting our business in an open, honest, and fair manner. Convergent's Supply Chain Code of Conduct establishes basic rules/procedures for business behavior regarding our suppliers, which we believe is vital to our business and the services we provide to our customers.