April 2024

NESS SUPPLIER CODE OF CONDUCT

Preamble

Our purpose is to build a better working world. To stay true to that purpose, we will continue to enhance the way we engage with our suppliers to encourage the continual improvement of the way we, and our supplier base, address and manage important issues. Our revised expectations and minimum standards within the enclosed document are the product of not only the increasing regulatory environment globally with respect to particular issues, but also the increasing expectations of our clients and the wider community.

Ness Digital Engineering organization (Ness) values our supplier relationships and is committed to working with, and supporting, our suppliers to achieve mutual objectives. A supplier's performance and adherence to high business standards is an important and integral part of the value chain for Ness. Ness promotes and expects the application of high legal, ethical, environmental and employee-related standards within our own business and among our suppliers.

All topics and the resulting requirements are summarized below. This Supplier Code of Conduct is based on international standards such as the OECD Guidelines and in particular the United Nations Global Compact.

For reasons of better readability, the simultaneous use of masculine and feminine forms of speech is dispensed with. All personal designations apply to all genders.

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This Supplier Code of Conduct sets forth the minimum standards of business conduct that we expect from all of our suppliers:

1. Compliance with laws:

Suppliers shall comply fully with all laws and regulations applicable to them.

2. Environmental Responsibility

The supplier commits to continuously reduce any negative impact on the environment within the scope of his business activities. Key measures include:

- Preventing accidents that impact the environment
- Minimizing waste and emissions
- Using energy-saving technologies
- Integrating recycling processes
- Saving resources through consistent prevention/reduction of waste

Products must meet the usual environmental protection standards. When using hazardous substances and chemicals, the supplier commits to comply with the legal provisions and regulations applicable to the supplier's affected business location, production site or market.

The supplier promotes the continuous development of the environmental policy and the assurance of transparency with regard to corporate decisions and activities that have an impact on society and the environment. This also includes the proper qualification of employees in the field of environmental responsibility.

3 Human Rights, Working Conditions, and Health Protection

The supplier complies with all labour standards in accordance with applicable national laws and regulations. Employees must be protected against physical punishment as well as physical, psychological, sexual, and verbal harassment. Employees' privacy must also be ensured. In addition, all employees are entitled to an appropriate living wage through freely chosen work, as well as the right to engage in union activity and collective bargaining (joining trade unions).

No persons below the statutory minimum age may be employed. The supplier must not employ younger workers between the applicable minimum age and the age of 18 either at night or in conditions that may impair their health, safety, or moral integrity or their physical, mental, spiritual, or social development.

The supplier shall guarantee occupational safety and health protection in the workplace in accordance with the national provisions and also support ongoing enhancements to improve the working environment.

4 Inclusion and Diversity

Ness fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated.

Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation. Ness expects suppliers to operate workplaces free of discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status.

5. Ethics

Any discrimination against employees, in particular on the basis of national or ethnic origin, social origin, health status, personal status, pregnancy, disability, sexual orientation, age, gender, religion, ideology, lifestyle etc. is not permitted.

The supplier maintains his business relationships based on the values of honesty, fairness and integrity. This also applies to relationships and activities with all stakeholders, including subcontractors and other business partners.

Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology). All invoices and any customs or similar documentation submitted to Ness or governmental authorities in connection with

transactions involving Ness must accurately describe the goods and services provided and the price thereof.

6 Preventing Bribery and Corruption

The supplier shall commit to adhere to all statutory provisions concerning bribery, corruption, and acceptance of benefits. The following is prohibited in particular:

- Offering, promising, or providing personal benefits to officials in return to fail or to discharge any of their official duties
- Offering, promising, or providing illegal personal benefits to employees or representatives from other companies
- Allowing acts of bribery to take place with the help of others, such as relatives, friends, agents, advisors, planners, and intermediaries
- Supporting illegal activities undertaken by other persons

Suppliers are expected to understand relevant Ness gift and hospitality policies before offering or providing Ness personnel with any gift and/or business entertainment. Gifts or entertainment should never be offered to Ness personnel or representatives under circumstances that create the appearance of impropriety.

The supplier shall also commit to prohibit his employees from requesting or accepting personal benefits (*e.g.*, an invitation to a meal or an event) from other persons within the scope of business activities or having such benefits promised to them. Such an advantage is only permitted if it does not create the impression of an expectation of consideration and is within the scope of generally accepted national business practices and does not violate any other applicable laws.

7 Data Protection

The supplier commits to comply with all applicable data protection laws and provisions in his area of activity (*e.g.*, Information Technology Act, 2000, directive General Data Protection Regulation (EU) 2016/679, Data Protection Act 2018 etc.).

The supplier shall commit to implement and maintain suitable and state-of-the-art technical and organizational measures to ensure an appropriate level of data protection and to promote data security. In this way, the supplier should secure data of any kind against manipulation, loss, unauthorized access, and other threats. The supplier commits to treat any data received from Ness (personal, technical, or other data and data in digital or analog (paper) format) with the same care and in line with the same safety criteria as for its own data.

8 Antitrust and Competition Law

The supplier shall comply with the rules of antitrust and competition law, *i.e.*:

- Agreements with competitors regarding market divisions are not permitted
- Prices, quantities, conditions, etc. must not be agreed with competitors

- In general, contact with competitors must be restricted to the minimum necessary amount

9 Order of Precedence; Modifications to this Supplier Code of Conduct

This Supplier Code of Conduct is designed not to override any applicable laws or terms in agreements between Ness and its Suppliers. In instances where there is a discrepancy between this Supplier Code of Conduct and any applicable legislation or contractual provision, the latter will take precedence. Ness retains the authority to revise or alter the stipulations of this Supplier Code of Conduct, with such changes effective upon notification to the Suppliers.

10. Commitment & Training

With the execution of the agreements between Ness and supplier, the supplier confirms to fully accept this Supplier Code of Conduct and to implement it accordingly in its organization. Furthermore, the supplier gives the customer permission to conduct announced company audits to be able to check the fulfilment of the requirements in reasonable periods of time and with suitable instruments to be able to initiate measures immediately in case of detected violations. Moreover, Ness expects that suppliers will actively audit and monitor their day-to-day management processes with respect to the Ness Supplier Code of Conduct and provide evidence to Ness upon request.

Suppliers must ensure their employees, subcontractors, and sub-tier suppliers working on Ness matters understand and comply with the contents of the Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards.

11. About Ness

Ness is a global Full-Lifecycle Digital Services Transformation company. Ness has been named a leader in overall Engineering, Research, and Development (ER&D) for three consecutive years by Zinnov Zones. The talent resource pool comprises 5000+ engineers across numerous innovation hubs in the US, Eastern Europe, and India. The Company has delivered more than 5000 production releases per year. For more than 20 years, Ness has proved its specialized product engineering expertise and has a 5 star Forrester Agile Delivery rating.

Ness refers to the global organization, and may refer to one or more of the member companies of Ness Group.