



Code of Conduct

WORDS FROM THE CEO

Snow Software is the global leader in technology intelligence solutions, ensuring the trillions spent on all forms of technology is optimized to drive maximum value. More than 4,000 organizations around the world rely on Snow's platform to provide complete visibility, optimize usage and spend, and minimize regulatory risk. Snow has more local offices and regional support centres than any other software asset and cloud management provider, delivering unparalleled results to our customers and partners. This implies a great responsibility not only for the customers and the products and services we provide, but also on good relationships, professional behavior and trust towards our customers and amongst ourselves.

Our ambition is to always deliver brilliance to all our customers, and we aim for always having the customer at the centre of what we do and as loyal advocates of Snow Software.

Our Code of Conduct is a guide to help us always do the right thing, to ensure we have good relationships with our colleagues, customers, partners and other stakeholders. Together, we create our work environments, culture and business relations that reflect in the products and services we provide to our customers. Everything we do must be based on respect, integrity and high ethical standards for us to remain a strong and successful company, poised for growth.

Vishal Rao, CEO Snow Software

2022



WHY DO WE HAVE A CODE OF CONDUCT?

Doing the right thing means we need to always act with integrity to ensure we are trusted by our customers, colleagues, business partners and the communities in which we work. Our Code of Conduct sets out what we expect from every single person working for Snow. It also underlines our responsibilities to our people, partners and shareholders. The Code of Conduct helps us all make informed decisions and tells us where to go for more information.

The Code of Conduct is our central policy document, outlining the requirements that every single person working for and with Snow must comply with, regardless of location. You may also have additional policies you need to follow to that are specific to your role or location.

Our Code of Conduct aims to support you in this by:

- Describing the responsibilities, you have as an employee of Snow Software.
- Guiding you in relationships with customers, partners, suppliers and other stakeholders.
- Guiding you in difficult situations.

Common sense and sound judgement should always be the primary evaluation of a situation, but to make the right decision, you may want to ask yourself the following:

- Is it legal, fair and ethical?
- If you were a customer or a colleague, would you consider the situation acceptable?
- If the situation became public, is it possible that Snow Software could be harmed or otherwise put at risk?

Don't hesitate to talk to your manager or contact the People & Culture team if you are uncertain about how to act.

"TRUST IS FUNDAMENTAL TO EVERYTHING WE DO."

RESPONSIBILITY FOR THE CODE OF CONDUCT

It is our key responsibility to develop and maintain an ethical and economically sound and prosperous business. Snow Software as a business has responsibilities towards our employees, business partners and toward society in general such as the countries, communities and environments in which we operate.

Key principles for our performance:

- We comply with legal requirements that apply in the countries where we do business.
- We are committed to do our business with a high standard of integrity and ethics.
- We are open-minded in dialogue with those who are affected by our operations. We respond to inquiries from external parties and communicate with affected parties in a timely and effective manner.

Within the sphere of our influence, we will endeavor to ensure that our business partners abide by the principles in our Code of Conduct.

As an employee at Snow Software, you are responsible to fully understand our Code of Conduct and when necessary, ask for guidance. This Code of Conduct also applies to anyone who represents Snow Software in any situation, thereby also includes others e.g. contractors, consultants & partners.

It is the responsibility of Snow Software people managers to communicate and live by the content as well as the spirit of this document within their functions, and to encourage employees to highlight behavior that may be non-compliant with these principles. Explicit or implicit approval of questionable actions will not be accepted.

Reports of violations of this code may be done confidentially to the People & Culture team. Persons reporting violations in good faith will not be subject to any retaliation.

This Code of Conduct will be promptly and consistently enforced. Failure to comply with its provisions can result in disciplinary action.

WHAT DOES THIS MEAN FOR ME?

The following is expected:

- Behave in an ethical manner, taking pride in your actions and decisions
- Comply with the principles and rules in our Code of Conduct and fulfil your legal and regulatory obligations
- Understand the Snow Spirit values and use the principles set out in this Code in your day to day work
- Call it out if you feel a working practice is not ethical or safe or if it breaches our Code of Conduct.

If you see or hear any behavior at work which you feel may be a breach of our Code of Conduct or seems illegal or unethical, please report it. You must report any behavior which you suspect to be unlawful or criminal. This could be bribery, fraud, anti-competitive behaviour or a breach of data privacy. You must also report abuse of our systems, processes or policies. This could be bullying or harassment, a conflict of interest, danger to the health and safety of employees or the public, potential abuses of human rights or serious environmental issues. Snow Software has a non-retaliation policy when a genuine concern has been reported. No action will be taken against you if you report such concerns, even if there is no proven unlawful conduct or compliance breach

Protecting the identity of people who raise a concern in good faith is our priority. Snow will not tolerate retaliation against an employee who raises a genuine concern. We will keep what you tell us private and confidential throughout the investigation process, subject to our legal obligations.

The most important thing is that you report your concern. Ultimately, it doesn't matter which route you choose. If you feel comfortable talking to your line manager, do that. Your line manager is there to support you and can help you choose the correct course of action or go directly to our legal or P&C team with your concerns.

WHAT HAPPENS NEXT?

The steps below outline what we do when someone raises a concern:

- When you raise a concern, a decision will be made as to which area will progress the matter: Our People & Culture or Legal team.
- We will then contact the person raising the concern, to ensure we have all the information we need and talk through our next steps.
- If we decide to proceed with an investigation, a qualified expert will investigate, keeping the person who raised the concern informed throughout the process.
- We will keep transparent and accurate records of all disclosures and subsequent actions.

Following the law Snow operates across multiple countries, our Code of Conduct cannot cover all of the laws and regulations in all of those countries, always be familiar with the relevant laws and regulations that apply where you work. If there is a difference between a local legal requirement and our Code, apply the most stringent standard. If in any doubt, contact your line manager, Legal or P&C team.

LINE MANAGERS

If you are a line manager, you have an important role in ensuring our Code of Conduct is understood and applied by your team. We expect you to do the following:

- Be a role model for following our Code.
- Ensure your team members are familiar with our Code and that they understand it.
- Hold your team members accountable for complying with our Code.

ETHICAL VALUES

Corruption, bribery and unfair anti-competitive actions distort markets and hamper economic, social and democratic development. Snow Software is committed to avoiding such practices.

- We shall not act contrary to applicable competition laws.
- We shall not offer customers, potential customers, governments, or any representatives of such entities, any rewards or benefits in violation of either applicable laws or Snow Software's policies governing gifts and hospitality.
- We must not accept payments, gifts, entertainment or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in any business decisions.
- We report all financial transactions by the Snow Software companies with generally accepted accounting practices, and accounting records must show the nature of all transactions in a correct and non-misleading manner.
- We all conduct our private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of the Snow Software companies. Should such a conflict of interest arise, it must be reported immediately by the person subject to the conflict to his/her immediate manager.

For more information, see Related Snow Policies

THE SNOW SOFTWARE WORKPLACE

"WE AIM TO CREATE AN INCLUSIVE ENVIRONMENT WHERE EVERYONE FEELS RESPECTED AND VALUED AND CAN TRULY BELONG."

In our recruitment process, we aim to hire the best candidates with the right competence and attitude who have potential to deliver brilliance in their roles and who will thrive in the company culture, our Snow Spirit. It is Snow Software's responsibility as an employer to ensure that every employee is treated equally and with respect.

Snow Software is an equal opportunity employer and complies with all applicable employment practices laws. Snow Software strictly prohibits and does not accept discrimination against employees, applicants, or any other covered persons because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including



pregnancy), gender (including gender nonconformity and status as a transgender individual), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, or any other characteristic protected under applicable law.

All Snow Software employees, other workers, and representatives are prohibited from engaging in unlawful discrimination. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, training, promotion, discipline, compensation, benefits, and termination of employment.

Snow Software will provide reasonable accommodations/flexibility to qualified individuals with a disability where possible. Employees who require an accommodation are encouraged to contact their line manager. Snow Software will also, where appropriate, provide reasonable accommodations for an employee's religious beliefs or practices.

We respect the United Nations Universal Declaration of Human Rights and recognize our responsibility to observe those rights that apply to our performance toward our employees and the communities we work and live in.

Snow Software is committed to maintaining a safe workplace. We are all responsible for making the work environment safe. A healthy and safe work environment results in healthy employees and increased well-being, thereby creating a basis for successful business results. Everyone is required to comply with all Snow Software's rules and guidelines, as well as any applicable laws regarding workplace safety. Failure to follow Snow Software's safety rules and guidelines will be taken very seriously and may result in disciplinary action being taken.

For more information, see Related Snow Policies

CUSTOMER RELATIONSHIPS & DATA

Our customers are central to everything we do, employees at Snow Software will always act in the best interest of all our customers. We act honestly, fairly and professionally, always aiming to provide our customers with relevant and factual information so that they can make correct business choices regarding Snow Software's products and services. We make sure we know our customers' needs, both today and in the future so that we base our business suggestions on facts and thereby deliver value to the customer.



We recognize that the correct and lawful treatment of our customers' information will maintain confidence in the organization and will provide for successful business operations. We protect our customers' information by complying with all data protection rules and regulations, and by not discussing with or supplying any confidential information to anyone who is not authorized to access the information in order to carry out their work. Any requests from formal authorities must be forwarded to the IT team.

Snow Software strives to conduct business in a professional manner towards customers, suppliers and competitors.

As a company, we respect laws concerning fair competition and marketing. We never talk about our competitors in a negative or insulting way, we always treat our competitors fairly and with respect.

When we purchase goods or services, we do it based on quality, delivery, price, service, reliability and supplier stability and reputation. All agreements signed with suppliers must clearly state services or products provided, terms and conditions.

For more information, see Related Snow Policies

EMPLOYEE DATA

Snow is committed to protecting the privacy and security of our employees' personal data. We will only process employees' personal data in accordance with applicable laws and our data privacy guidelines, and will strive to ensure that the personal data we collect is adequate, relevant, not excessive, and processed for limited purposes.

For more information, see Related Snow Policies

CONFLICTS OF INTEREST

A conflict of interest could potentially arise when different parties have interests in a situation that conflict with each other. Examples are:

- An employee is likely to make a financial gain at the expense of Snow Software.
- Snow Software has an interest in the outcome of a product or service provided to a customer which is different from the customer's interest.



In conducting business in a professional manner, Snow Software seeks to avoid and prevent any of these situations from occurring. We should therefore never recommend a product or service that doesn't add value to the customer. Likewise, we should never recommend a product or service that doesn't add value to the customer but gives the employee financial gain.

Any potential decisions on hiring, promoting, compensation or dismissal of a closely related person should always be made through People & Culture.

MEDIA AND COMMUNICATION

All requests from the media concerning Snow Software should be directed to the local marketing contact. If no local spokesperson is available, it should be checked with your Manager or Executive Leader on who is best placed to respond to the inquiry, or forwarded to the Marketing and Communications team.

We encourage all employees to spread the word about Snow Software as a company and as an employer and to follow "Snow Software" on social media platforms to see what is happening in the Snow world. You can find us on LinkedIn, Twitter, Instagram, Facebook and Google+.

If you as an employee communicate via social media in your professional role, you are representing Snow Software. In doing so please consider Snow Software's professional standard and the principles of the Snow Spirit to correctly reflect our company values.

ENVIRONMENT

Snow Software endeavors to minimize the direct and indirect impact of our operations on the environment and contribute to global sustainability through a number of corporate initiatives. As a software manufacturer, Snow's primary contribution is through reducing our own global carbon footprint and encouraging our business partners and suppliers to do the same. Additional areas of focus include product innovations to help our customers reduce their environmental impact.

For more information, see Related Snow Policies