



Ethical Sourcing Policy

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I. Purpose:

Optiv Security Inc., Optiv Federal Inc. and their subsidiaries and affiliates (“Optiv”) is committed to promoting high standards of ethical behavior in all of its activities. As such, Optiv expects its vendors, suppliers, consultants, agents, contractors, distributors, partners, business associates, and other third-party representatives (“Vendors”) to uphold these same standards. This Ethical Sourcing Policy (“Policy”) sets forth Optiv’s expectation that its Vendors uphold the same high standards of ethics as well as compliance with applicable laws and regulations.

The Policy sets out Optiv’s minimum expectations for Vendor conduct and is not intended to limit or discourage anyone from reaching still higher standards. Optiv is committed to recognizing continuous improvement of performance and to promoting best practices within its supply chain.

Optiv recognizes that, in applying this Policy, Vendors must also be mindful of their obligations under applicable laws, rules and regulations and their respective contractual arrangements with us and others. If local laws, rules or regulations applicable to a Vendor or a Vendor’s pre-existing contractual arrangements conflict with the expectations set forth in this Policy, Vendors are expected to work in good faith with us to reach a mutually agreeable resolution that ensures compliance with the local law(s) or regulation(s) and, to the greatest extent possible, the letter and spirit of this Policy. In the event of conflict between the terms of a Vendor’s contract with Optiv and the provisions of this Policy, the contract terms will prevail. This Policy does not constitute an employment contract or create an employment relationship between Vendor’s employees and Optiv.

II. Governance & Ethical Business Practices

Optiv is committed to conducting its business in compliance with all applicable laws, rules and regulations. Optiv expects its Vendors to comply with both the letter and the spirit of all laws, and regulations that apply to the Vendor’s business, particularly as it relates to the following topics:

- **Anti-Bribery and Anti-Corruption**
Optiv does not tolerate corruption or bribery in any form and expects its Vendors to fully comply with requirements of all applicable anti-corruption laws. Vendors must not directly or indirectly give, offer, or accept anything of value to improperly obtain or retain business or favored treatment, to improperly influence actions or to obtain an improper advantage for Optiv, itself, or any third party. This includes a prohibition of any inappropriate or excessive gift, favor, service, or other inducement of any kind to any representatives, officers, agents or employees of Optiv.
- **Anti-Money Laundering**
Vendors must not engage in illicit activities, including doing business with those engaged in illicit activities, including, without limitation, money laundering, terrorism financing, human trafficking, slavery, or the proliferation of weapons of mass destruction.
- **Anti-Trust and Fair Competition**
Optiv expects its Vendors to comply with applicable anti-trust and competition laws. Vendors must not conduct any behaviors in violation of such anti-trust laws (including but not limited to excluding competition, bid rigging, or price fixing). Vendors must not conduct any behaviors that would lead to the Vendor having

an unfair advantage (including but not limited to abuse of privileged information, concealment/misrepresentation of material facts, or manipulation).

- **Whistleblower Protection**

Optiv expects its Vendors to provide their workers with open access to transparent and confidential processes to raise workplace concerns, resulting in swift and fair investigation, with a clear resolution and protection from retaliation.

III. Labor & Human Rights

Optiv is committed to protecting human rights and preventing modern slavery and human trafficking in all aspects of its business and supply chain. Optiv expects its Vendors to comply with labor and human rights laws set forth by the applicable governing authorities, including but not limited to the International Labor Organization's Fundamental Conventions, the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights, to ensure adherence with the following standards:

- **Fair Wages and Benefits**

Optiv expects its Vendors to provide fair and competitive wages and benefits, that – at a minimum – meet or exceed the requirements of applicable law or, where statutory provisions (or their equivalent) do not exist, provide for an adequate standard of living for all employees.

- **Working Hours**

Optiv expects its Vendors to set working hours such that:

- workers are not required to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week;
- workers are allowed to take reasonable rest breaks and lunch breaks; and
- workers are granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, included but not limited to, holidays, family care leave and sick leave.

- **Freely Chosen Employment**

Optiv expects its Vendors establish policies and procedures that prohibit engaging in any practice that could reasonably be considered as employing or encouraging any form of modern slavery, including forced labor and human trafficking. No involuntary work of any type is permitted, including but not limited to, forced or compulsory labor, trafficked labor, indentured labor, bonded labor, involuntary prison labor, or forced overtime.

- **No Child Labor**

Vendors must take all necessary steps to ensure that there is no child labor, as defined by the International Labor Organization or other applicable labor organization, within their organizations or supply chains.

- **No Discrimination or Harassment**

Optiv expects its Vendors to offer equal employment to all, to treat all workers with dignity and respect and to maintain a work environment that is free from intimidation, violence and abuse. Discrimination or harassment on any grounds, including but not limited to race, color, religion, sex, national origin, age, disability and genetic information, is prohibited.

- **Safe Workplace Conditions**

Optiv expects its Vendors to, and ensure that their subcontractors, provide safe and healthy workplace conditions to prevent accidents, injuries or exposure to health risks.

IV. Environment

Optiv expects its Vendors to operate their facilities in compliance with applicable environmental laws, rules and regulations, including those applicable to waste disposal and hazardous and toxic material handling. Optiv also expects its Vendors to operate in compliance with the letter and spirit of applicable environmental laws and regulations. Lastly, Vendors must have mechanisms in place that aim to set higher standards and goals in order to further reduce the negative impact their products have on the environment.

V. Compliance

This Policy sets forth Optiv's expectations for current and future Vendors. Optiv expects all new and existing Vendors to self-monitor their compliance with this Policy and make continuous improvement to their business as noted herein while conducting business with or on behalf of Optiv, and to self-report to us in a timely manner of any non-compliance.

If requested, Vendors are expected to provide written information, including, copies of policies and procedures and extracts of data regarding the topics included in this Policy. Any Vendor that does not comply fully with this Policy is expected to remediate any lapses to Optiv's satisfaction in a timely manner and at no additional cost to Optiv or its customers. Failure to agree upon a remediation plan, or failure to implement it, could adversely affect ability to be awarded additional work and/or result in termination.

Optiv is committed to continuously reviewing and updating this Policy. Therefore, this Policy is subject to modification from time to time. Optiv's Ethical Sourcing Policy is available at <https://www.optiv.com/compliance>.

The failure or omission by Optiv to insist upon strict performance and compliance with any of the provisions of this Policy at any time shall in no way constitute a waiver of its rights.