

Syniti Part of
Capgemini

Doing Business the RITE Way

CODE OF CONDUCT, DECEMBER 2025





Dear Synizens,

As a global leader, Syniti is committed to the highest professional and ethical standards. Doing business the RITE way, with respect, integrity, trust, and ethics, is not just about compliance with the law. It is the cornerstone of our global culture and business. Syniti's reputation, growth, and success are dependent upon it, as are those of our customers and partners.

This Code of Conduct builds the foundation for how we do business the RITE way by highlighting Syniti's key policies and principles. Each of us is a crucial part of SynitiRITE and is responsible for reflecting the principles of this Code of Conduct in all our business dealings.

If you have questions about this Code, about what doing business the RITE way means at Syniti, or if you have concerns about possible ethical issues, please reach out to your supervisor or your HR Business Partner. You can also contact me, Suzanne Barth, our Chief People Officer, or Janet Mesrobian, our General Counsel, or our [Compliance and Ethics Hotline](#).

I'm proud of this initiative and the commitment that we have all shown to doing business the RITE way.

The best is yet to come,

Kevin Campell

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Introduction

As a global organization, Syniti is committed to doing business in a professional and ethical manner, as well as fostering an environment where we are all treated with dignity and respect. We strive to create a culture of success at all levels while making ethical decisions and maintaining Syniti's integrity. This Code of Conduct ("Code") supports the Syniti RITE compliance program, which fosters a culture of doing business the RITE way: with Respect, Integrity, Trust, and Ethics.

This Code guides Syniti personnel's ethical decision-making when conducting business with our customers, partners, investors, governments, and each other. Syniti's reputation and continued success depends on our conduct, no matter our roles or where we are located. We have the responsibility to do business the RITE way, to ensure that our conduct protects and promotes the principles of this Code, and to comply with the laws of countries in which we do business. Adherence to these ethical principles is fundamental to our future success.

Syniti expects all employees, leaders, officers, partners, and stakeholders to exercise reasonable judgment when conducting business. We encourage our teams to refer to this Code regularly to ensure we are all doing business the RITE way.

All Syniti employees have a duty to know, understand, and comply with this Code. However, this Code is not intended to reduce or limit other obligations we may have to Syniti. Instead, the standards in this Code should be viewed as the minimum standards that we should use to conduct business.

Speak Up

If you have questions or concerns about this Code, we encourage you to speak with appropriate Syniti leaders or to reach out to the reporting channels listed in the Compliance Reporting Procedures section of this Code. All personnel should feel free to report any concerns, as Syniti has a strict non-retaliation policy.

Syniti's Impact

Beyond delivering data excellence to our clients, our organization and our 100% data-focused team make a meaningful impact in the world. Our guiding principles shape our actions and messages, both internally and externally.



Conducting Ethical Business

Compliance with Laws, Rules, and Regulations

We conduct our business globally with high standards of ethics and compliance. We comply with all applicable laws, rules, and regulations. We expect the same of our suppliers, consultants, and those with whom we do business.

Compliance with Anti-Bribery and Anti-Corruption Laws

We are committed to maintaining a transparent and trustful relationship with our customers and partners. We comply with the Foreign Corrupt Practices Act (FCPA), the UK Anti-Bribery Act, and any other applicable anti-bribery or anti-corruption laws, rules, and regulations anywhere that Syniti conducts business.

Bribes are financial advantages, anything of value, or other rewards that are offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence them in order to gain certain advantages. We are prohibited from offering, promising, giving, soliciting, or accepting any bribes, gratuities, or kickbacks. Further, we shall not make any payment, gift, or contribution to any candidate for public office or government official in exchange for favorable treatment in a business relationship or transaction.

Syniti personnel should consult with the General Counsel to obtain formal approval before providing anything of value to any government officials or before providing anything of value that could influence a third-party to provide Syniti personnel with certain advantages.

Accuracy of Records

The accuracy of Syniti's records and financial statements is fundamental to Syniti's global reputation for integrity and reliability. Personnel may not document or record business information in a deceptive or unlawful manner.



Learn More:

[Syniti Global Anti-Bribery Policy](#)

Conducting Ethical Business

Gifts & Political Contributions

We may not accept any excessive gifts or entertainment. Syniti employees should decline gifts or entertainment from third-parties where it could cause a real or perceived conflict of interest. Before offering gifts or entertainment, Syniti personnel must ensure that the offer will not cause a real or perceived conflict of interest and that it is reasonable, appropriate, and proportionate. All gifts and entertainment must comply with applicable laws and Syniti's Expense Policy.

While Syniti does not make political contributions, engage in any political activities, or endorse any political candidates or organizations, employees may engage in such activities only in their personal capacity, and on their own time, without the use of Company resources or facilities.

Conflicts of Interest

Syniti respects the right of its personnel to engage in outside activities. A conflict of interest may nevertheless occur when one's personal interests interfere with Syniti's interests. As such, personnel must avoid situations that present a real or perceived conflict between their personal interests and Syniti's interests.

Any transaction or relationship that reasonably could be expected to give rise to a real or perceived conflict of interest should be reported promptly to the Company's General Counsel or Chief People Officer.

Q & A

Q: I would like to give a gift to a customer. How should I determine what is appropriate?

A: We should always consider the specific circumstances surrounding a gift. We should ask ourselves whether the gift could create a real or perceived conflict of interest and whether the gift is nominal, reasonable, appropriate, and proportionate under the circumstances. When in doubt, we should reach out to the Company's General Counsel for guidance.

Conducting Ethical Business

Fair Dealing

It is Syniti's policy that employees deal ethically and lawfully with its customers, partners, suppliers, employees, and others in all business dealings on Syniti's behalf. We compete fairly and comply with all antitrust and trade laws. We use truthful and appropriate resources for competitive intelligence.

Protection and Proper Use of Company Assets

Syniti personnel are expected to protect all Syniti assets and to use such assets solely for business purposes. Assets include equipment such as laptops, servers, and communication devices, as well as intellectual property, such as our proprietary software and confidential information. Proper use of assets helps to protect Syniti's assets and information entrusted to us by our customers and partners. Information created by, transmitted by, received, or stored in Syniti's systems are company property. Any improper conduct with Syniti assets could result in liability to the involved parties. Personnel should have no expectation of privacy in their use of Syniti equipment, and all such usage should be in accordance with this Code and any applicable Syniti policies.



Q & A

Q: Is the customer always right?

A: Not if they are asking us to do something illegal or unethical. We must address customer needs while complying with the law and ethical standards.

Conducting Ethical Business

Confidential Information

We value and protect our own confidential information, and all confidential information entrusted to us by third- parties. Confidential information includes all non-public information, including information that might be of use to competitors or harmful to the company or its customers if disclosed.

We do not disclose any proprietary information or confidential information to anyone, whether inside or outside of Syniti, who does not have a legitimate business need to know and only when disclosure is authorized, or as required by law.

We shall not access proprietary information and confidential information for which we are not authorized or about which we do not have a legitimate business need to know, and must take appropriate, reasonable safeguards to prevent incidental access or disclosure of such information.

Q & A

Q: A partner is asking you to provide them with a customer's confidential information. How should you respond?

A: You should ensure that the receiving party has a legitimate business need to know the confidential information, you should receive authorization to disclose it, and you should ensure that the partner is under obligations of confidentiality with Syniti.

Intellectual Property

Syniti has gone to great lengths and considerable expense to create, develop, improve, and protect its valuable intellectual property, trade secrets, patents, copyrights, trademarks, service marks, and other types of intellectual property. Our success and continuous growth also depend on our intellectual property development and innovative solutions.

Intellectual property refers to the things a person creates that are subject to legal protection and are protected from unauthorized access and use from others.

We must protect our intellectual property and not disclose such intellectual property to third-parties outside Syniti without authorization.

Data Privacy

We are committed to comply with data privacy laws and regulations while conducting our business and handling information. Syniti has implemented internal policies, controls, as well as technical and organizational measures in order to protect personal data against loss, accidental destruction, misuse, or incidental access or disclosure.

Learn More: [Privacy Policy](#)

Conducting Ethical Business

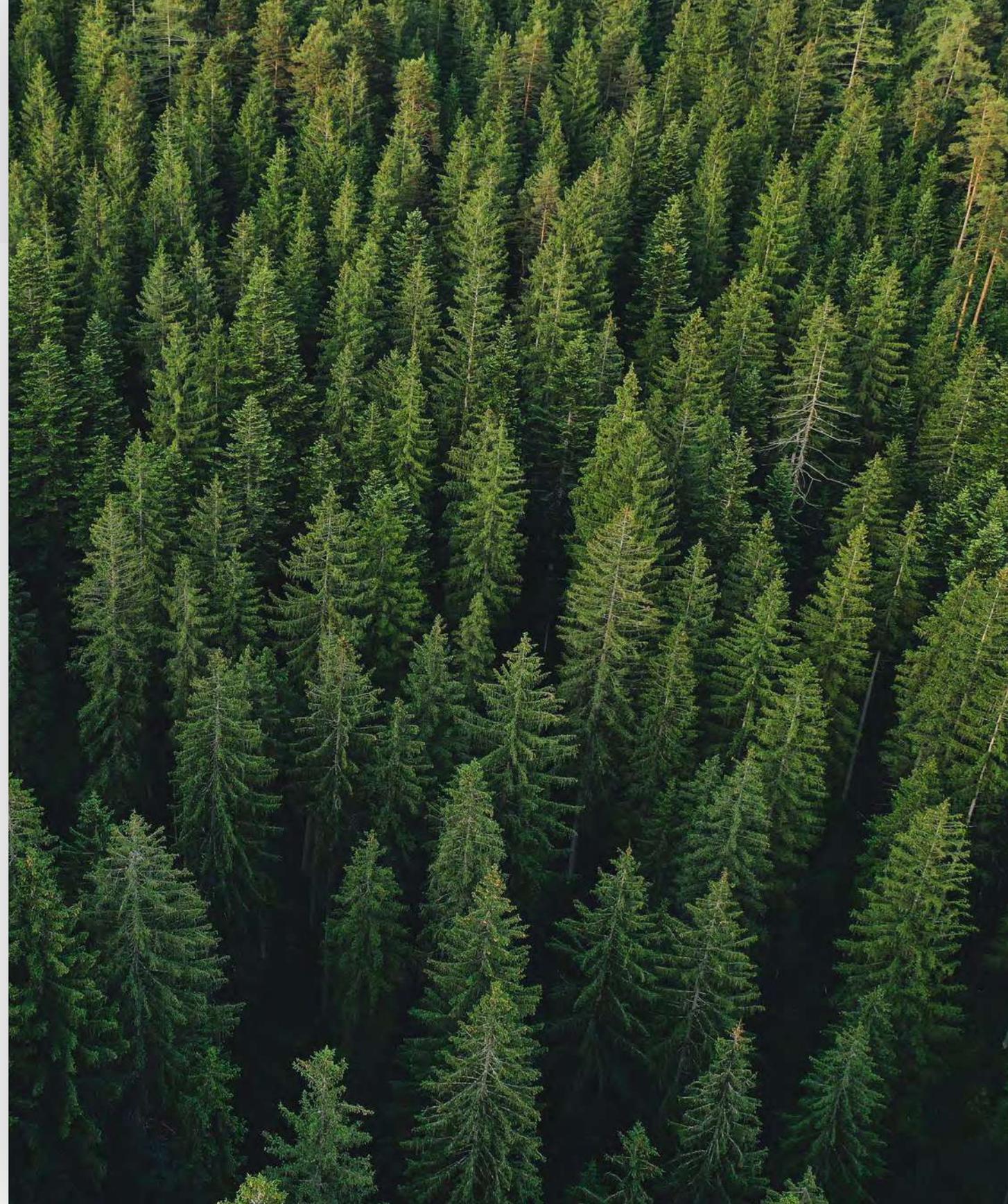


Environmental & Social Responsibility

We believe it is important to implement sustainability practices in order to protect the environment. At Syniti, we all have a role to play in fostering a sustainable work environment and should take appropriate steps to ensure that we conduct our business in a socially responsible manner.

We are committed to promoting volunteerism and charitable activities in our community.

[Syniti Gives Back Webpage](#)



People & the Workplace

Equal Opportunity & Diversity

Syniti respects, values, and welcomes diversity in our employees, clients, partners, and suppliers and is dedicated to creating an inclusive environment. As a global business, we have an obligation to provide equal opportunity and treatment for all Syniti personnel.

We are firmly committed to a policy of equal opportunity in employment, development, and advancement for all personnel without regard to any legally protected status, including race, color, national origin, citizenship, religion, ancestry, marital status, gender, gender identity or expression, sexual orientation, genetic information, pregnancy, familial status, mental or physical disability, medical condition, age, disabled veteran or other protected veteran or military status, participation in discrimination complaint-related activities, or any other characteristics protected by law.



People & the Workplace

Anti-Harassment

We are committed to providing our employees with a work environment that is free of any harassment. We will not tolerate any form of harassment. All Syniti personnel have a responsibility to keep Syniti free of harassment by taking appropriate action whenever they experience or witness offensive behavior.

Sexual harassment is a topic that deserves special mention. Sexual harassment means unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual nature where submission to or rejection of such conduct is made explicitly or implicitly a term or condition of employment or the basis for employment decisions or where such conduct has the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating, or sexually offensive working environment.

Syniti Personnel who are subjected to or are aware of harassment should report such conduct to the appropriate Syniti reporting channels.

Learn More: [Global Anti-Harassment Policy](#)

Labor Practices & Human Rights

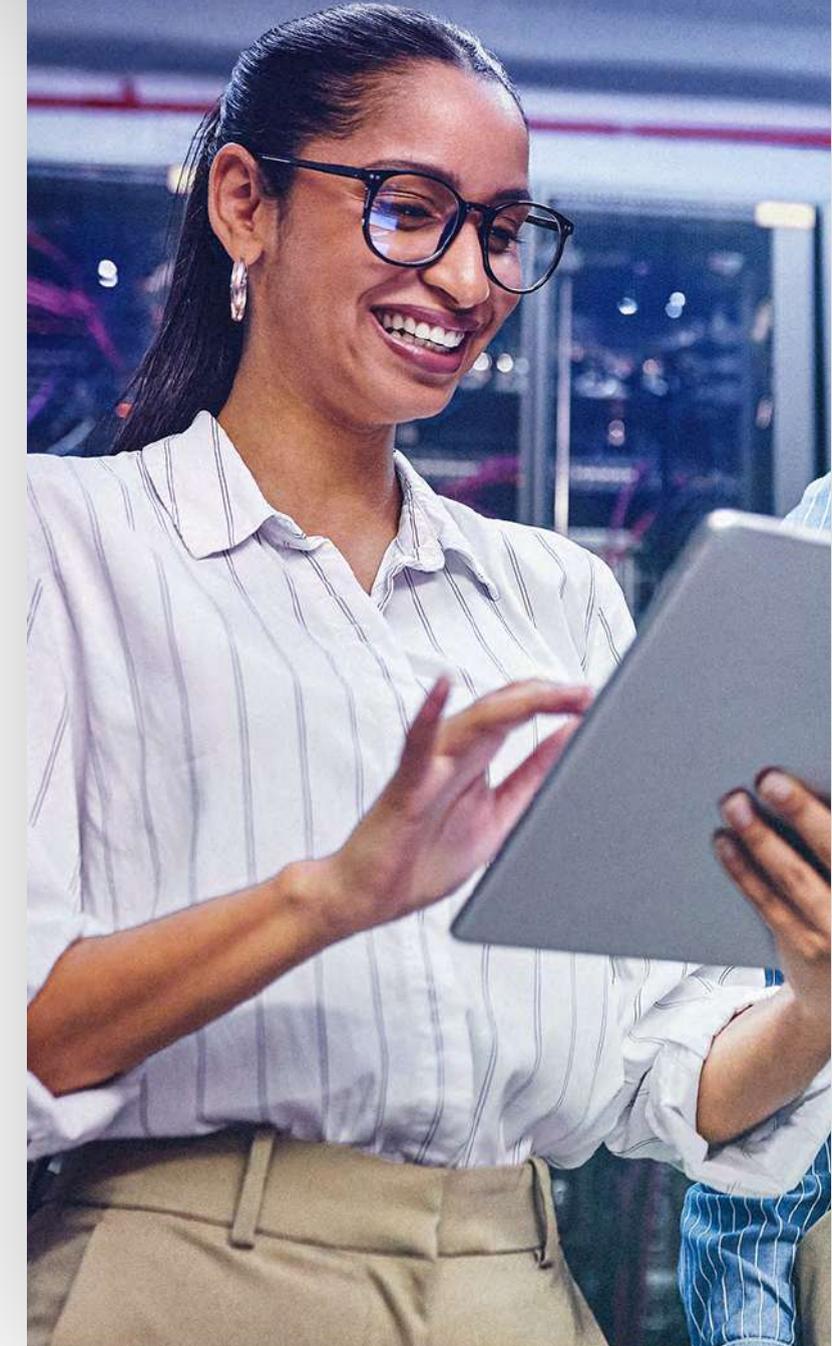
We respect all applicable labor and employment laws wherever we operate and do business. We respect the right of employees to freely associate and cooperatively work with employee representatives, as applicable. We are committed to promoting human rights and take the necessary steps to prevent slavery and human trafficking in our business activities.

Learn More: [Anti-Slavery Policy](#)

Q & A

Q: A co-worker made an inappropriate joke, and I found it offensive. What should I do?

A: You can speak with your co-worker directly and you can reach out to your direct supervisor, People Operations representative, Syniti's Chief People Officer, General Counsel, and [Syniti's Global Ethics & Compliance Hotline](#).



People & the Workplace

Syniti Communications

We encourage all Syniti personnel to share their authentic, transparent, and honest perspectives with the world. In sharing communications, Syniti personnel should be aware of how they may have an impact on Syniti's reputation in the global community. Syniti personnel should not share any communications that are confidential or that may be inappropriate, harmful, disparaging, or defamatory to Syniti or other Syniti personnel, and should not communicate on Syniti's behalf unless authorized.

Learn More: [Social Media Policy](#)

Remote Working

Syniti is committed to prioritizing workplace flexibility for all Syniti personnel. Where appropriate, Syniti may permit personnel to perform their duties inside or outside of the traditional office setting as needed. During the duration of any such arrangement, personnel shall follow all applicable rules, policies, procedures, and laws.



People & the Workplace

Substance Misuse & Awareness

Syniti is committed to a workplace free from intoxicating substances. Syniti personnel shall not consume or use alcohol, intoxicants, narcotics, or controlled substances in any form while conducting Syniti business. The consumption of intoxicating substances will only be permitted in the cases of the proper use of medications when prescribed for treatment by a registered physician, dentist, or other person legally authorized to prescribe controlled substances, or the consumption of alcohol in moderation during company-sponsored social occasions so long as personnel are not performing mandatory job functions or operating a motor vehicle.

Syniti offers mental health services at no cost through an Employee Assistance Program (EAP) for employees struggling with substance misuse and other mental health concerns. Employees should contact their regional benefits managers with any questions.

Workplace Security

Syniti believes it is important to protect the safety and security of its personnel. Any personnel who detect a breach of security should immediately report the breach to a supervisor or manager. When appropriate, personnel should never hesitate to call the police or building security. Above all, personnel must never place themselves in harm's way or possible danger if they detect a possible breach of security.

Syniti condemns acts of workplace violence and has zero tolerance for anyone who engages in intimidating, threatening, or violent behavior toward others. Syniti strictly prohibits weapons of any kind from being on Syniti property or client locations, including when the individual is licensed to carry a weapon. Syniti will immediately investigate any reported intimidating, threatening, or violent behavior committed on Syniti property or client locations, and reserves the right to report violence or threats of violence to law enforcement authorities when necessary.

Establishing and maintaining a safe work environment is a responsibility shared by all Syniti personnel. Syniti strives to ensure a safe and secure business environment and to comply with all applicable safety laws and regulations.

Administration of This Code

Compliance Reporting Procedures

We are encouraged to be proactive by asking questions, seeking guidance, and reporting suspected violations of this Code, any other Syniti policies, or any suspected violations of applicable laws, rules, or regulations relating to Syniti's business. If any personnel believe that such violations have taken place or may be about to take place, they must bring the matter to the attention of the appropriate supervisor or manager.

Questions or concerns about this Code, as well as any report of misconduct, may be addressed to any of the following reporting channels: your direct supervisor, a Syniti People Operations representative, the Syniti Legal Department, any relevant Syniti supervisor, Syniti's [Global Ethics & Compliance Hotline](#), Syniti's General Counsel, or Syniti's Chief People Officer. All reports and questions raised will be treated in a confidential manner to the extent possible and will be taken seriously.

You can contact Syniti's [Global Ethics & Compliance Hotline](#) at any time to report misconduct.

Non-Retaliation Policy

Neither Syniti nor any Syniti personnel shall discipline, discriminate against, retaliate against, or tolerate any discrimination or retaliation by any other individual against any person who reports, in good faith, a suspected violation of this Code.

SynitiRITE Trainings and Policies

Various trainings are frequently provided to Syniti personnel on topics relevant to SynitiRITE, Syniti's compliance program, and doing business the RITE way. All personnel are expected to take these courses to further familiarize themselves with the standards expected of them throughout this Code. Additionally, Syniti has various internal policies, available on Syniti Connect, with further information about the subjects of this Code.

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syniti.com | [@syniti](https://twitter.com/syniti)