

Global Code of Conduct

Introduction

SHI International Corp. ("SHI") is committed to the highest standards of ethics, integrity, and sustainability globally, and expects the same from its employees.

Purpose and objectives

The SHI Code of Conduct is a practical guide for employees to make ethical decisions, act with transparency, and treat others with respect. This Code supports SHI's mission to deliver exceptional value and experience by guiding organizations to better technology decisions through scale, expertise, and professional, trustworthy, and personalized services.

Qualitative objectives

- **Integrity:** SHI is committed to upholding the highest standards against bribery, corruption, and all forms of unethical or illegal conduct in every aspect of operations.
- **Sustainability:** SHI continually seeks opportunities to reduce environmental impact, encourage resource efficiency, and promote positive environmental practices across our operations and partnerships.
- **Respect:** SHI employees treat others with fairness, dignity, and respect, and support a safe, inclusive, and harassment-free workplace.
- **Accountability:** SHI continuously evaluates and improves its practices and holds itself accountable to the highest standards of ethical and sustainable conduct.

Quantitative objectives

- **Corruption risk assessment:** SHI conducts corruption risk assessments at all operational sites at least every two years.
- **Annual training:** All employees must complete annual training on key provisions of the Code of Conduct.
- **Incident reporting:** All employees have access to confidential and anonymous reporting channels, with the goal of ensuring that all reported incidents are addressed promptly and efficiently.

Scope

This Code applies to employees of SHI and its affiliated entities.

Accountability and governance

- **All employees** must adhere to the Code and SHI values, as well as applicable global and entity-specific policies.
- **Managers** must model ethical behavior, set clear expectations, and foster open communication.
- **Legal, Human Resources, and Business Assurance Departments** ensure alignment with laws, investigate concerns, and monitor adherence.
- **Violations** may result in disciplinary action, as outlined in the SHI employee handbooks.

Policy measures

Anti-bribery and anti-corruption

- Zero tolerance for bribery, corruption, and facilitation payments, as set out in Foreign Corrupt Practices Act (US), the Bribery Act 2010 (UK), and all other applicable laws.

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- Never offer, promise, or accept any payment, gift, or hospitality intended to gain an unfair business advantage.
- All business courtesies must be aligned with the standards set forth in SHI policies and local laws and regulations and must be accurately and transparently recorded (see also Corporate Recordkeeping section).
- If unsure, seek guidance from management, the compliance team, or consult the Code.
- See detailed guidance in the local Employee Handbook.

Anti-trust and competition

- Make independent business decisions and never collude with competitors regarding pricing, customers, territories, recruitment, or hiring.
- Avoid anti-competitive practices (e.g., price fixing, bid rigging, market allocation, group boycotts, and output restrictions).
- Use only publicly available or properly acquired competitive intelligence.
- Report any situation perceived as anti-competitive.
- Refer to the local Employee Handbook for further details.

Anti-money laundering (AML)

- Prevent and report money laundering and financial crimes.
- Be vigilant against fraudulent schemes (shell companies, false invoicing, dealings with sanctioned entities).
- Follow due diligence for new, returning, or existing customers.
- Accurately record all transactions and cooperate with audits.

Conflict of interest

- Prohibit activities or relationships that impair or appear to impair objective business judgment, including nepotism, directly engaging with business partners or third-party vendors with whom an employee has a family relationship, dual employment with competitors, self-dealing, vendor kickbacks, or improper use of company assets.
- Disclose actual, potential, or apparent conflicts to management and HR.
- Seek guidance before engaging in activities that could create a conflict.
- Always act with integrity and transparency.

Anti-harassment and anti-discrimination

- Zero tolerance for harassment or discrimination based on protected characteristics (race, gender, age, disability, religion, sexual orientation, etc.).
- Employees should report concerns to HR or their manager.
- Retaliation against those who report in good faith is strictly prohibited.

Diversity, equity, and inclusion (DEI)

- Treat everyone with respect and dignity.
- Support a discrimination-free environment.
- Speak up against unfair practices.

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Data protection and confidentiality

- Protect confidential and proprietary company information.
- Never input confidential information into public AI tools.
- Follow legal protections (patents, copyrights, trademarks, and trade secrets).

Protecting company assets

- Use company assets only for legitimate business purposes.
- Strictly prohibit downloading pirated content or lending company devices.
- Report loss, misuse, or security breaches immediately.

Corporate recordkeeping

- Maintain accurate, complete, and timely business records.
- Never conceal or destroy documents under investigation.
- Comply with record retention protocols.

Compliance with international trade laws

- Comply with all export controls, sanctions, and trade laws in every applicable jurisdiction.
- No sales or transfers to restricted entities or for prohibited use.
- Contracts must be reviewed by Legal.

Government and public sector dealings

- Government officials include any individual acting on behalf of a government, public institution, or international organization.
- All interactions with government officials must comply with applicable laws and company policy, be appropriately documented, and avoid any form of improper influence or conflict of interest.

Whistleblower Policy

SHI provides confidential reporting channels that enable employees, partners, customers, and other stakeholders to raise concerns about ethics, legal compliance, and misconduct.

Stakeholders are expected and encouraged to report in good faith any conduct that violates SHI's policies, values, or applicable laws. Misconduct may include, but is not limited to, fraud, bribery or corruption, legal violations, unethical behavior, or other improper business practices.

Reports may be submitted via the following channels:

Confidential Email: ethics@shi.com

Anonymous Whistleblower Hotline: U.S. +1 (732) 377-2300 | U.K. +44 (0) 1908 75 3306

All reports are reviewed by appropriate internal functions, including Compliance, Legal, or Human Resources, and are addressed in a fair and consistent manner. Where appropriate, investigations are conducted and corrective actions are taken.

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SHI International Corp has a strict Anti-Retaliation Policy and will not tolerate retaliation against any employee who brings a good faith report of misconduct or participates in any investigation.

Partners are expected to maintain appropriate processes within their own operations to enable the reporting and escalation of concerns and are required to cooperate with SHI in the investigation of any reported issues.

Compliance and training

- All employees must complete annual training on key provisions of the Code of Conduct.
- Regular audits and assessments ensure adherence.
- This Code is communicated at onboarding and made available company-wide.

Risk management and business continuity

- SHI actively manages business risks and maintains a business continuity plan.
- The SHI Alert system communicates during interruptions.
- Employees must understand risk principles and support business continuity efforts.

Related policies

This Policy provides overarching guidance for SHI’s global operations and is to be implemented in conjunction with entity-specific policies and procedures, ensuring compliance with all applicable local laws and regulations. In the event of a conflict between this Policy and other entity-specific policies or handbooks, the policy most relevant to the legal entity shall take precedence to ensure adherence to local requirements and practices.

Review and revision

- This Code is reviewed annually and updated as necessary for effectiveness and relevance.
- Progress on quantitative objectives is tracked and reported.

Final guidance

If you are ever uncertain about what to do, pause and reflect, consult the Code, and seek advice from management, HR, or the compliance team.

Thai Lee
CEO and President

Version	Effective Date	Changes Made	Author/Owner
2.0	12/01/2025	07/09/2026	Kuli Sidhu, Sr. Director - Business Process Assurance, Business Assurance