

Docupace Technologies

Ethical Sourcing Policy

Introduction

Docupace Technologies LLC. (Collectively with its subsidiaries, “Docupace”) is committed to conducting its business in an ethical, legal, and socially responsible manner. We act with integrity in all our business dealings, and we expect our Suppliers (defined below) to do the same. Docupace aims to provide its customers with quality products and services. In today’s global market, this means sourcing products from a variety of locations nationally and internationally. In recent years, concerns over poor working conditions and environmental degradation in developing countries and emerging markets have seen companies implement specific social and environmental criteria for the production facilities from which they source products.

In order to address these concerns, Docupace is introducing its Ethical Sourcing Policy to ensure it is:

- > Sourcing its products in a responsible manner,
- > Working with its suppliers to improve their social and environmental practices,
- > Providing clear guidance to its buying staff, and
- > Protecting its corporate reputation, the reputation of its individual businesses, and their brands.

Our Commitment

Docupace is committed to upholding human rights, fair working conditions, and environmental protection. In accordance with the expectations of our customers, the community, and the requirements of the Law, we endeavor to always operate responsibly within the community, and we expect the same from our suppliers. Maintaining a reputation for the highest legal, moral, and ethical standards in our dealings with our customers and other key stakeholders is critical for our ongoing success. The Policy has been developed to complement our core values of integrity, trust, and acting responsibly. We are committed to working with our suppliers to help improve their labor and environmental practices. We expect our suppliers to support the ethical standards set out in this Policy regarding workplace safety, environment, and fair pay and employment conditions. The Policy sets out the standards that we

expect all of our suppliers to comply with when producing and supplying products for Docupace, no matter where they operate in the world. We recognize that full compliance with these criteria may take time for some suppliers, and we are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

Our Expectations

The Policy applies to Docupace suppliers and contractors and their employees, agents, and subcontractors throughout the world (“Suppliers”). Compliance with the Policy is required to transact business with Docupace. Subject to a Supplier’s contractual agreement with Docupace, failure to comply with this Policy may be grounds for Docupace to terminate its relationship with the Supplier. Suppliers must also ensure that any subcontractors used while conducting business with Docupace follow standards that mirror those reflected in this Policy.

Compliance with Law

Each Supplier must maintain awareness of and comply with applicable laws and regulations in all jurisdictions where the Supplier conducts business, including but not limited to:

- › Trade controls, as well as all applicable export, re-export, and import laws and regulations;
- › Antitrust and fair competition laws;
- › All laws and regulations on bribery, corruption, money laundering, terrorist financing, and prohibited business practices, including but not limited to (i) the Foreign Corrupt Practices Act (FCPA),
- › The UK Bribery Act, and other anti-corruption laws, (ii) laws governing lobbying, gifts, and payments to public officials, and (iii) political campaign contribution laws;
- › Laws relating to the protection of human rights and dignity; and
- › Privacy and information security laws and regulatory requirements.

If a law and this Policy address the same issue, the more stringent requirement shall apply to the Supplier. Docupace also expects that all Suppliers maintain a written Policy of business conduct policy that is available to, and binding on, the Supplier’s employees, contractors, and agents. This policy should incorporate the requirements of the applicable laws and regulations, and include effective controls, including

training, monitoring, auditing, and good record keeping, to prevent and detect unlawful and unethical conduct. Should an issue arise where the Policy's standards are not met, the Supplier must notify Docupace without undue delay.

Transparency and Ethical Business Practices Antitrust, Competition Laws, and Fair Dealing

Docupace is committed to conducting business honestly and ethically within the framework of a free market. Docupace competes fairly and follows all applicable antitrust and competition laws. Docupace expects the same from its Suppliers. In particular, Suppliers must not:

- > Propose or agree with any competitor to fix, restrict, adjust or control prices, margins, or contractual terms and conditions;
- > Coordinate competing bids or otherwise orchestrate any bid process in an attempt to direct a contract to a particular competitor;
- > Boycott suppliers or customers, or;
- > Otherwise discuss, plan or arrange to unreasonably restrain competition.

Supplier is expected to disclose to Docupace all actual or potential conflicts of interest. Anticorruption and Bribery Laws Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. No matter where a Supplier conducts business on behalf of Docupace, certain anti-corruption laws, including the FCPA and the UK Bribery Act, must be followed. Corruption, in any form, including bribes, kickbacks, or lavish gifts and/or entertainment, are strictly prohibited. Suppliers may never offer, promise, give or pay (directly or indirectly) something of value in order to obtain or retain business or improperly influence a recipient's actions, or accept such an improper payment or benefit, while working on behalf of Docupace. Providing gifts or entertainment to Docupace employees to obtain or retain business or gain an improper advantage is prohibited. Furthermore, it is never appropriate to give or receive a gift or offer of entertainment that is extravagant, creates a sense of obligation, or has the intent to influence a business decision. An exception allows Docupace employees to accept minor value marketing items bearing the trademark or logo of Suppliers (for example, cups, pens, mousepads or notepads) as a business courtesy if the Docupace employee is not primarily involved in the sourcing, procurement, or contracting for goods or services. As a general rule, Suppliers should not offer gifts or entertainment to Docupace employees valued at over \$25.00 per gift.

No gifts or entertainment should be offered to Docupace employees during a Request for Proposal (RFP) or other vendor selection process.

If you believe corrupt practices are occurring within Docupace's supply chain, Suppliers must report such concerns to Docupace immediately.

Conflicts of Interest

Docupace is committed to conducting business with transparency. As part of that commitment, Docupace requires its Suppliers to avoid situations or relationships that involve an inappropriate conflict, or the appearance of a conflict, with the interests of Docupace.

Respect for Human Rights

Docupace expects its Suppliers to share its commitment to human rights and dignity. While working on Docupace's behalf, Suppliers must, without limitation:

- › The use of modern slavery is prohibited. Suppliers should observe and comply with international principles relating to human rights, including, but not limited to, the Trafficking Victims Protection Act and the UK Modern Slavery Act of 2015.
- › Treat all individuals with respect and dignity;
- › Respect and safeguard individual privacy rights;
- › Prohibit violent behavior, harassment and discrimination;
- › Ensure voluntary employment and prohibit use of forced or involuntary labor of any type, including support for any form of human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercive means; and
- › Not require workers to lodge "deposits" or their identity papers (government-issued identification, passports, or work permits) with their employer and make sure all workers are free to resign their employment in accordance with local and national laws or regulations without penalty. The use of child labor is prohibited. No person under the age of 15 (or under 14 were permitted by local law) may be employed. Workers under the age of 18 may not perform work that is likely to jeopardize their health or safety. No Tolerance for Discrimination Supplier should promote equal employment and business opportunities irrespective of race, religion, age, national origin, skin color, sex, sexual orientation, gender, gender identity, disability, pregnancy, marital status, political affiliation, and military status.

Labor and Wages Suppliers should:

- > Furnish fair compensation and comply with all applicable wage laws, including, but not limited to, those relating to minimum wages, overtime hours, maximum work hours and all applicable regulations.
- > Observe and comply with local law requirements governing maximum work hours.
- > Respect employees' right to freely associate and bargain collectively in accordance with all applicable laws and regulations; Health and Safety Docupace expects Suppliers to provide workers with a safe, secure and healthy environment in compliance with all applicable laws and regulations and implement reasonable and effective occupational health and safety measures.

Protecting the Environment Docupace recognizes its social responsibility to protect the environment. Docupace expects its suppliers, at a minimum, will comply with all applicable environmental laws regulations and standards. Suppliers should be able to demonstrate control over their environmental impact with an active environmental program, preferably through a certified environmental management system and active environmental policy.

While working on Docupace's behalf, Suppliers are encouraged to minimize the following:

- > CO2 emissions in direct operations and supply chain
- > Energy consumption in direct operations and supply chain
- > Water consumption in direct operations and supply chain
- > Waste in direct operations and supply chain Suppliers should strive to demonstrate an environmental management program that addresses:
- > Air quality - emission of other pollutants of any kind in direct operations and supply chain
- > Water quality in direct operations and supply chain
- > Chemicals management in direct operations and supply chain Protection of Assets, Intellectual Property, and Confidential Information Supplier must always protect Docupace assets, confidential information and intellectual property.

The following are examples of information that the Supplier must not disclose without Docupace's express authorization:

- > The terms and conditions of your agreement(s) with Docupace;
- > Docupace business and marketing plans, and other internal Docupace matters such as pricing, costs, terms of sale, customer lists, and other competitively sensitive information;

- › Docupace intellectual property (including patents, copyrights, trademarks, and trade secrets) and Docupace technical information; and
- › Personal information of Docupace employees or contractors. Docupace confidential information should only be shared with those individuals that need to know the information to fulfill the purpose for which Docupace engaged the Supplier; those individuals may only use such confidential information for the purpose for which it was disclosed by Docupace.

Suppliers must also respect and protect the valid and legitimate intellectual property rights of Docupace and each customer including, without limitation, patent, trademark, copyright, and trade secret rights, and use those rights only in accordance with valid licenses, terms of use, or other relevant contractual provisions. Supplier must notify Docupace immediately of any known unauthorized use of Docupace trade secrets, brands, trademarks, logos, or confidential information by any third party.

Data Privacy and Data Protection Suppliers are expected to understand and comply with all applicable laws and regulations related to data protection, privacy, and information security.

If you wish to report questionable behavior or a possible violation of this Policy—whether by a Docupace employee or Supplier employee—you are encouraged to work with your primary Docupace contact to resolve your concern. If such reporting is not feasible or appropriate, please contact Docupace through the following means:

- › Report via phone at (844) 905-2956 or online at <http://docupace.ethicspoint.com/>
- › Mail: Send a letter to the Chief Legal Officer at Docupace, 400 Corporate Pointe, Suite 300, Culver City, CA 90025

If you learn of a possible violation of law, regulation, or Policy through your own internal ethics reporting structure that may affect or impact Docupace, please also report it through the above channels. Docupace encourages Suppliers to make such reports with as much information as possible, including identity, so that the matter can be investigated thoroughly. If Suppliers are not comfortable doing so, however, Suppliers may choose to report anonymously where permitted by local law. Once Docupace has received a report, we will promptly follow internal policy to take appropriate action to investigate the report and respond accordingly. Docupace expects all Suppliers to cooperate fully with any investigation and will make every effort to protect the confidentiality and, where permitted by local law, anonymity. Docupace also expects



that all Suppliers will not retaliate against any person for such person's good faith report—either internally or to Docupace—that a possible violation of law, regulation, or this Policy has occurred. All other questions regarding this Policy or Docupace's legal compliance policies can be addressed to: Communications@Docupace.com

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