



Code of Conduct

2023



Message from CEO Chris Todd



Hi everyone,

At UKG, our purpose is people. We are committed to achieving this purpose by living our core values—United, Kind, and Growing—every day and in everything that we do. Our culture is an intentional one—one that values diverse perspectives, actively sacrifices individual preferences in order to benefit the greater good, values transparency and kindness, is adaptive and agile, offers support and opportunities for growth, and relentlessly pursues great outcomes.

Embedded in that culture is a profound commitment to doing the right thing for our employees, customers, and other stakeholders. This includes actively working to earn and maintain trust by showing consistency between our words and actions, by being transparent, and by taking personal and collective responsibility for the decisions we make and the outcomes that follow.

UKG has a variety of tools to help our employees understand and live our values. Our Code of Conduct, which applies to all UKG employees throughout the world, is one of them.

Our Code is not intended to provide comprehensive solutions to every issue that may arise. Rather, it is intended to help you identify potential issues, provide information about our expectations, and to encourage you to reach out if you have a concern or need help determining the right thing to do.

At UKG, the decisions that we make every day impact our reputation, how engaged each of you are at work, and the overall success of our business.

Thank you for your commitment to living by our Code and for all that you do to make UKG a great place to work for all.

Best,
Chris

Table of Contents

Message from CEO – Chris Todd	2
Our Values and Behaviors	3
The Role of all U Krewers	5
The Role of Managers	6
At UKG, we follow the law	7
Data Privacy	7
Anti-Corruption, Gifts and Gratuities	9
Anti-Money Laundering	10
Anti-Trust and Competition	10
Export Control	10
At UKG, we are United. We are better together.	11
At UKG, we are Kind. We will do the right thing.	12
We Avoid Conflicts of Interest	12
We Deal Fairly with Others	14
We Protect What is Ours and Use it Appropriately	16
Confidentiality	17
Accuracy of Books, Records and Public Reports	18
Third Party Confidentiality and Media Inquiries	18
Property Rights and Confidentiality	18
At UKG, we are Growing. We can make an impact.	19
Environmental, Social and Governance (ESG)	19
Human Rights and Modern Slavery	19
Reporting Concerns and Potential Misconduct	20
Non-Retaliation Policy	20
Compliance Requirements	20
Waivers of this Code of Conduct	20

Our Code of Conduct

Our Code describes our commitment to our values and behaviors, summarizes the essential laws and policies that we need to know while working at UKG, and sets forth the standards of conduct expected of all UKG employees (sometimes called U Krewers). This Code applies to all employees of UKG Inc. and all of its subsidiaries worldwide.



Our Values and Behaviors

Our values and behaviors are foundational to who we are, how we interact with one another, and how we achieve that purpose.

Our values shape our culture by defining what we believe in and care about the most: we are United, Kind, and Growing.



We are
better together



We will
do the right thing



We can
make an impact

These values are intended to define how we go about our work and respond to business and ethical challenges. If we uphold, promote, and live our values consistently, we will earn and maintain trust, foster a culture of accountability and compliance, and ultimately be successful individually and collectively. We make better business and ethical decisions when we make them together. We earn and maintain trust, and our reputation for integrity, when we do the right thing. Our ability and opportunity to have a positive impact on each other, our customers, and partners, and on the communities in which we live, grows immeasurably when we act honestly and ethically.

Our values are supported by the expected behaviors that go along with them:



Inclusion/Inclusive

- We **seek to understand** the wide range of identities, experiences, and cultures that make up UKG.
- We **invite and value diverse** perspectives, styles, and talents to ensure we're better together.
- We respect and encourage **authenticity**.

Collaboration/Collaborative

- We assume positive intent and **listen to understand**.
- We exchange **honest and actionable feedback** to address difficult matters and improve ideas and solutions.
- We set aside individual preferences to **benefit the greater good**.



Trust/Trusting/Trustworthy

- We actively work to **extend, build, and repair trust** with others.
- We show **consistency between words and actions**.
- We **create transparency** by sharing direct, timely, and relevant information.

Care/Caring

- We **treat others with kindness**, taking a genuine interest in their wellbeing.
- We recognize where help or encouragement is needed and **offer support**.
- We acknowledge and **show appreciation** for each other's contributions.



Agility/Agile

- We **seek out and try new ideas** to ensure continuous improvement and innovation.
- We **adapt** to shifting conditions, priorities, and emerging opportunities.
- We **learn and apply new skills**, methods, and behaviors to improve and expand our capabilities.

Accountability/Accountable

- We demonstrate a strong **drive to achieve results for our customers**, both internal and external.
- We take **personal responsibility** for decisions, actions, outcomes, and lessons learned.
- We focus on the solution, **persisting through obstacles** and setbacks when they arise.

These behaviors reflect and result in a culture that is highly engaged, highly performing, has a high sense of belonging, and strives to the highest ethical standards in all that we do.



Making Good Decisions

Our Code cannot anticipate every situation you may encounter in the real world. Many times, good judgment, and your own sense of right and wrong will lead you to the right decision.

But, when faced with a situation you are unsure how to handle, follow the "UKG" process to reach the right outcome:

- **U**nderstand the issues. Many ethical issues can be avoided by taking the time to think about the situation, and the issues raised by it, before taking action.
- **K**now the basics. Always look first to our UKG values and behaviors, this Code, our policies, and the training you receive for guidance. These tools are designed to give you the foundational principles you need to make the correct decision or point you in the direction towards making the correct decision.
- **G**et help. Never hesitate to reach out to your manager or one of the many UKG resources that are available to help you if you need it. Engage them early and often. A list of resources is available in this Code.

The Role of All U Krewers

All U Krewers are responsible for maintaining our culture of compliance by:

- Complying with this Code, our policies, and the laws that apply to you in your role
- Taking the time to learn, uphold, promote, and live our values consistently
- Being accountable for your own conduct
- Being collaborative and transparent by seeking guidance from your manager and others if you are unsure how to handle a particular situation
- Promptly reporting instances where you believe someone has done something improper, or if anyone asks you to do something that you believe is improper
- Cooperating with investigations
- Completing all required trainings on-time

The Role of Managers

Managers play an essential role in championing compliance within UKG. As a manager, you are expected to consistently demonstrate the highest standards of ethical behavior, and to promote an environment that fosters doing the right thing and a genuine commitment to living our values by:

- Modeling the behaviors embodied in those values—inclusiveness, collaboration, trusting and trustworthiness, caring, and agility—in all that you do
- Creating an environment where people feel comfortable raising concerns
- Taking concerns that are raised seriously, including taking the time necessary to understand the issues involved
- Helping employees make decisions that are consistent with this Code, our policies, and our values
- Promptly escalating issues or engaging with subject matter experts in HR, Legal, and elsewhere within the company when and where appropriate to do so
- Recognizing and rewarding ethical behavior



At UKG, we follow the law

Following the law is essential to building and maintaining the trust of our customers, partners, and fellow U Krewers. We do not expect you to be experts in the law. But you are expected to be familiar with the laws and Company policies relevant to your role, to use common sense and good judgment, to spot potential issues, and, when you do, to use the various resources available to ensure you get it right. Proactively engage with UKG's legal, human resources, and other subject matter experts in a transparent manner—we are better, and make better decisions, when we make them together.

There are many laws that apply to us throughout the world where we do business. Certain areas of the law are essential to our business, including:

Data Privacy

UKG takes the privacy of our customers, website visitors, and employees seriously. We are committed to building secure products and services that respect and protect the privacy of our users, and each UKG employee is responsible for helping to ensure the privacy and security of the sensitive information our customers, employees, and others entrust to us.



UKG has policies, educational materials, and controls designed to help us meet our privacy obligations and protect data. These resources explain what employees can and cannot do with data, where they can keep it, with whom data can be shared, what protections need to be put into place to ensure that data is shared appropriately, when and how to properly dispose of data, and what to do if data is ever handled improperly. UKG also has a team of experts whose job it is to help you understand and comply with our privacy obligations throughout the world where we do business, and to support the building of products and services that meet or exceed those obligations.



Q. While working in a common area, Phyllis walked away for a snack leaving her computer at the table unattended and unlocked. Is it appropriate for Phyllis to leave her computer unlocked and unattended even for just a few minutes?

A. No – While Phyllis did not intentionally share data, she did leave her computer unlocked and unattended making it accessible to anyone who walked by. Phyllis has an obligation to ensure the privacy of the personal data and other sensitive information our customers, employees, and other third-parties entrust to us remains secure. Phyllis should lock her computer (Windows Key + L) before leaving it unattended, whether at her desk or in a common space.

All U Krewers are expected to understand our obligations with respect to the different types of data that we handle, follow the training and other educational materials we provide, never do anything to circumvent controls the Company has put in place, and proactively collaborate with our experts when and where appropriate—including during the software development lifecycle.

You may access UKG's Data Privacy policy at www.ukg.com/privacy and employees may access UKG's policies and other resources on the [UKG Policy Portal](#).



Q. During the course of your job, you mistakenly send an email containing sensitive personal data to the wrong person. What should you do?

A. Your most immediate action is to either email Security@UKG.com or to Create a Security Incident with Global Security by submitting a ServiceNow ticket.



Anti-Corruption, Gifts, and Gratuities

UKG complies with the U.S. Foreign Corrupt Practices Act, the United Kingdom Bribery Act, and the anti-corruption laws throughout the world where we do business.

This means we:

- Can, do, and must win business on the strength of our products, services, and people
- Never give, offer, accept, or promise anything else of value that may be construed as illegal or improper. We do not tolerate bribes or kickbacks of any kind.
- Conduct appropriate due diligence on third parties (as we can be held liable for their actions) and require those third parties to comply with applicable anti-bribery laws
- Accurately record all payments and transactions
- Act responsibly with gifts and hospitality. All gifts and hospitality that we offer must be reasonable and appropriate under the circumstances, and may only be offered when it complies with applicable laws, the rules applicable to that particular individual (including our customer's policies), and UKG's gift and hospitality policies and standards. The anti-bribery laws that apply to employees in the public sector are particularly complex and, in some instances, you may not be able to provide any gifts or hospitality. If you have a question about whether a gift or hospitality is appropriate, contact ComplianceOfficer@ukg.com before you offer it.



Q. UKG is close to signing a new customer. The customer pulls the UKG sales rep aside and says, "the business is yours if you can get me tickets to tonight's big game." Should the sales rep buy the customer the tickets?

A. No – we must win business on the strength of our products, services, and people. Giving someone tickets to win a deal violates this Code, UKG's Anti-Bribery Policy and, depending on the customer, may violate anti-bribery laws.

Anti-Money Laundering

Money laundering is a process where funds generated through criminal activity—such as terrorism, drug dealing, tax evasion, or fraud—are moved through legitimate businesses in order to hide their criminal origin. We are committed to conducting our payroll and other money movement services in a way that prevents them from being misused for illegal or criminal activities by complying with applicable Anti-Money Laundering (AML) laws and regulations, and maintaining a robust AML Compliance Program.

All U Krewers who support those services are expected to be proactive when it comes to spotting financial transactions or other suspicious activity—i.e., red flags—that might indicate that there is a potential problem, and to promptly report any concerns in accordance with our [AML Policy](#).



Red flags, or behaviors which may indicate illegal financing activities are occurring, include:

- A customer who refuses to provide requested information, provides false information, or avoids direct questions about ownership or operations of the business
- Payments to the customer's employees whose hours worked for the customer are unclear or non-existent (i.e., ghost payrolls)
- Customers who engage in transactions that appear different from their historic patterns

See [UKG's AML Policy](#) for a more comprehensive list of red flags.

Anti-Trust and Competition

We compete fairly and vigorously. Antitrust and competition laws prohibit certain agreements with competitors that may be deemed to harm competition or restrain trade, such as agreements to fix or control prices, agreements not to compete for business in certain areas or market segments, agreements not to hire each other's employees, or any other agreement that may have the effect of limiting competition. Even participation in industry associations, benchmarking activities, or industry events may raise questions. Because competition laws are complex, seek guidance from UKG Legal if you have or expect to have contact with one or more of our competitors. These laws also impact how we must work with resellers and other third parties who sell our products to customers. UKG Legal must review and approve all indirect sales' programs to ensure compliance with these laws.

Export Control

UKG complies with all applicable customs, import, and export laws and regulations associated with the countries where we operate. We do not conduct unauthorized business with countries or third parties that are subject to trade embargos or other sanctions. We also do not participate in any boycotts that the United States does not support. Resellers and other third parties with whom we do business are required to do the same.

At UKG, we are United. We are better together.

We seek to understand the wide range of identities, experiences, and cultures that make up UKG. We value diverse perspectives, styles, and talents, and respect and encourage authenticity. As a supportive community, we assume positive intent and listen to understand, we exchange honest and actionable feedback, and set aside individual preferences to benefit the greater good.

We are building a diverse, empowered, and inclusive workforce at UKG. A place where unique identities are not only welcomed, but sought out and celebrated. This includes fostering a workplace where everyone feels valued, respected, safe, and confident that they belong. We champion a culture of trust, equity, and belonging for all, and a workplace where all U Krewers have abundant opportunity to grow. We celebrate what makes each U Krewer unique.

Uniquely You, Uniquely Valued

Our purpose can only be realized when our employees feel respected and safe bringing their whole selves to the workplace where everyone has a voice. A place where unique identities and perspectives are not only welcomed, but sought out, celebrated, and well-represented. An equitable workplace where everyone has abundant opportunity to grow and reach their full potential. Though we are individually unique, we profoundly identify as the U Krew family, where we believe in the same values, and each and every employee belongs.

A Workplace Free from Discrimination or Harassment

We simply will not tolerate any discriminatory treatment or harassment based upon race, color, national origin, religious belief, gender, gender identity or expression, sexual orientation, age, disability, or perception of disability, past or present military service, physical appearance, or any other basis protected by federal, state/provincial, or applicable local law. Incidents of discrimination or harassment must be reported to your manager or a corporate officer promptly. These actions may be illegal and are clearly unethical. Any reports of this conduct will be investigated by the Human Resources department and UKG Legal and addressed appropriately.



At UKG, we are Kind. We will do the right thing.

Doing the right thing is an essential UKG value. Over the years, UKG employees have consistently demonstrated a commitment to doing the right thing—even in situations where it would have been easier to choose a different path. Our commitments to being trusted and trustworthy, to showing consistency between our words and actions, to transparency and accountability, and to persist through obstacles, demand nothing less of us individually and collectively.

Be open, honest, ethical, and fair in everything you do for UKG. Work tirelessly to extend, build, and repair trust with our customers, partners, and fellow U Krewers. Demonstrate a relentless consistency between your words and your actions and honor our profound commitment to transparency. Embrace and augment our caring culture by treating others with kindness, offering support and encouragement, and showing appreciation for each other at all times.



Q. I sit on the board of a local non-profit organization unrelated to UKG's business. Over the next month, I will be involved in a weekly meeting for the non-profit that occurs during my work hours. Is it necessary for me to have permission from UKG to do so?

A. Yes, when participation in such activities involves time during the business day or use of UKG resources, you should first obtain permission from your manager.

We Avoid Conflicts of Interest

A conflict of interest occurs when your personal interest interferes, or appears to interfere, with the interests of the Company. When faced with such a situation, you are trusted and expected to act in the best interests of UKG and to avoid a conflict. Many conflicts can be addressed or mitigated by being transparent about the situation up front—promptly share direct, timely, and relevant information with your manager, HR business partner, or UKG Legal.

While we cannot list every potential conflict of interest, here are some examples:

- Having a business or employment relationship with a customer, supplier, or competitor, other than at UKG's request
- Having a financial interest in a competitor of the Company, other than an investment representing less than one percent of the outstanding shares of a publicly held company
- Supervising, reviewing, or influencing the job evaluation, compensation, or hiring of a family member or any person with whom you have a close personal relationship, including a romantic relationship
- Using UKG equipment or resources for non-business purposes
- Accepting gifts or other business courtesies that do not comply with UKG's Conflict of Interest Policy

For more examples of potential conflicts of interest and how you should handle them, see **UKG's Conflict of Interest Policy**.



Q. Angela sits on the board of a non-profit. Her department is looking for a supplier to provide similar services to those offered by the non-profit she is a part of. What should Angela do?

A. Angela cannot let her work with the non-profit influence who she selects as UKG's supplier. Angela should disclose her position at the non-profit to her manager and ensure that the vendor selection process is objective, which may require removing Angela from the decision making. Angela's manager should instruct Angela not to discuss the UKG engagement with her fellow board members during the procurement process or thereafter should her non-profit be selected as the vendor.



Q. One of the vendors that Sarah works closely with sent her a small holiday gift basket. Is she permitted to accept the gift?

A. Yes. Small gifts of fairly low value are acceptable.



We Deal Fairly With Others

Our relationships with all third parties with whom we work, must be rooted in trust, fairness, honesty, and accountability. We must demonstrate our values and behaviors in every interaction that we have with them. This includes selecting third parties with whom we do business in an impartial manner based upon price, quality, and services offered. Any action to favor, to give one supplier an unfair advantage, or to select a third party on any basis other than the best interests of the Company is prohibited.

Employees who deal directly with suppliers should take particular care to avoid even the appearance of impropriety in those relationships. Statements about the Company's products and services must not be false, misleading, deceptive, or fraudulent. Never take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of important facts, or any other unfair dealing practices.

We conduct ourselves in an honest and ethical manner, and hold ourselves accountable for being aware of and following the rules that apply to us. We expect the same of everyone who works on our behalf, including agents, business partners, subcontractors, and other third parties. Those third parties must comply with our third party **Code of Conduct** or demonstrate that they have and comply with a comparable code. All third parties are required to comply with all laws, regulations, and professional standards that apply to their relationship with UKG, and must be familiar with and comply with the laws and regulations, including those related to 1) employment and labor rights, 2) anti-corruption and export control, and 3) health, safety, and environmental protections.



Working with Government Customers

The rules for providing products and services to government customers or other public sector entities may be more complex and considerably stricter than those that apply to commercial customers.

When working with government customers, we must:

- Ensure that everything we provide is current, truthful, complete, accurate, and submitted in a timely manner, including anything related to costs or hours worked, all correspondence, bids, and proposals, and claims and disclosures
- Maintain the highest level of procurement integrity and complying with all applicable rules related to the government procurement process, including with respect to access to competitive proposal information, internal source selection information, and post-employment restrictions on certain current and former government employees
- Avoid kickbacks, bribes, and prohibited commissions
- Promptly disclose violations of law in connection with the award, performance, or closeout of government contracts or subcontracts



Q. Ellie is a UKG Sales Rep in the retail vertical. She is hoping to secure a large sporting goods store chain in her territory as a customer. Her primary contact expressed great interest in functionality that is not available as part of the product. In a discussion with the product managers, Ellie found out that the functionality was being considered for the product roadmap next year. Ellie knew that the addition of this functionality would help close the deal and, after obtaining permission internally to discuss proposed functionality, she called her contact to tell her about it. The prospect was so excited to hear this that they asked to place the order as soon as possible. During negotiations, Ellie found out that product management subsequently decided not to include the functionality in next year's roadmap. Should Ellie tell the prospect?

A. Yes – Ellie should tell the prospect that the functionality is not on the product roadmap. Statements about the products and services must not be false or misleading.

A Workplace Free from Substance Abuse

UKG is committed to providing a safe, quality-oriented, and productive work environment for our employees. With this goal in mind, and because alcohol and drug abuse pose a threat to the health and safety of UKG employees and to the security of the company's equipment and facilities, all U Krewers must comply with UKG's Drug-Free Workplace Policy, found in our **Employee Handbook**, as a condition of employment.

We Protect What is Ours and Use it Appropriately

Our information systems, technology and tools, intellectual property, buildings, and other corporate assets are tremendously valuable. We are each personally responsible for protecting our assets from unauthorized access, fraud, theft, loss, or abuse.

This means you must:

- Immediately report any suspicious network activity or behavior or other evidence of an actual or potential cyber-incident
- Understand and strictly follow UKG's IT and security policies, standards, and procedures
- Never do anything to circumvent, diminish, or change without express authorization from UKG Security, any technical or physical controls installed or maintained by UKG
- Immediately report any suspicions of fraud, theft, loss, inappropriate access, or misuse of any UKG asset
- Use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of others
- Return UKG's property, including any files or data, when you leave the Company



Q. You receive an email from someone you don't recognize. By mistake, you click on the link in the email, and it takes you to a website you are not familiar with, but nothing else happens. Do you need to report this to UKG Security?

A. Yes. This could be phishing.



Confidentiality

You must protect confidential information entrusted to you by the Company or other companies, including our suppliers and customers and limit disclosure of confidential or sensitive information to those with a “need to know”. You should also be sure to comply with any obligations imposed by a non-disclosure or confidentiality agreement. Unauthorized disclosure of any confidential information is prohibited.

Social Media

You are personally responsible for the content you publish to online social networks. Please remember your affiliation with UKG, as well as our company values, and use your best judgement when posting. Social media participation must not violate any applicable UKG policies, including this Code and UKG’s **Corporate Communications Policy** and Social Media Policy [here](#).



Q. You are a UKG employee who is very active on LinkedIn. You frequently connect with customers, vendors, and coworkers, often sharing UKG-related posts and highlighting open roles within the company. Scrolling through LinkedIn one evening, you come upon a post by one of your coworkers proudly announcing that UKG has acquired a small company that has been an excellent UKG partner for many years. Your coworker has a great relationship with this partner, and tags them in this post. You are familiar with this acquisition, but do not believe that it has been finalized. In fact, you believe that knowledge of this acquisition is confidential. What should you do?

A. While your coworker is very excited about this potential acquisition, he or she should not disclose information which is confidential. This post does not comply with UKG’s Code of Conduct or Social Media Policy. You should report the post by emailing SocialMedia@ukg.com, or reporting via the UKG ReportingLINE.

Accuracy of Books, Records, and Public Reports

All business transactions reported by employees must be honest and accurate. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records, and accounts shall be maintained in keeping with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be set up for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property, shall be made without adequate supporting documentation.

Third Party Confidentiality and Media Inquiries

Third parties may ask you for information concerning the Company. Employees (other than the Company's authorized spokespersons) must not discuss internal Company matters with, or distribute internal Company information to, anyone outside the Company except as necessary to fulfil their Company duties and after a proper confidentiality agreement is in place. Media inquiries about the Company are subject to this prohibition. All responses on behalf of the Company to inquiries must be made only by the Company's authorized spokespersons.

Proprietary Rights and Confidentiality

As a condition of employment, you are required to agree to protect the Company's proprietary rights and confidential information and to assign any rights to intellectual property developed during your employment to the Company. You must also abide by any lawful obligations that you have to your former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company, and non-competition obligations.



At UKG, we are Growing. We can make an impact.

Environmental, Social, and Governance (ESG)

Our promise to our customers, employees, and the world at large is to always strive to meet or exceed ethical, legal, commercial, environmental, and public expectations of how a company should conduct business. Through the Environmental, Social, and Governance (ESG) program at UKG, we are committed to influencing positive change with strong sustainable practices throughout the world.



We care deeply about our environmental impact and our responsibility to take care of the world in which we live and work. Our recent and ongoing efforts to reduce our environmental footprint, including both our own corporate output and the sustainability and environmental practices of our trusted suppliers and vendors, are a critical component of our ESG Program.



We believe that we can only achieve business success when we support and empower people, from employees and customers to investors and partners, as well as the communities we serve across the globe. To bring our people-driven purpose to life, we have established both internal and external programs designed to create an engaging, supportive, and equitable environment for all.



We recognize our obligation to our business stakeholders and partners by establishing corporate processes and reports that honor our commitments to our employees, our customers, and the communities we serve. And we are committed to demonstrating the positive impact we are making through measurable progress and tangible results that we share with all our key stakeholders.

Human Rights

As is reflected in our Human Rights Policy, we are committed to respecting internationally recognized human rights in our operations, which includes our employees and those in our supply chain, in our products, and in our communities. This commitment is informed by our adherence to the United Nations Guiding Principles on Business and Human Rights (UNGPs). This means we aim to respect the rights of all individuals affected by our business and will work to address any adverse impacts that we may cause or to which we may contribute. It also means that we seek to mitigate adverse human rights impacts that are directly linked to our operations, products, or services by our business relationships with third parties, including those in our supply chain (collectively, “partners”). We also believe that we can serve as a catalyst for action by our partners.

Modern Slavery Statement

The Company complies with modern slavery prevention laws, including the Modern Slavery Act 2015 (UK), and the Modern Slavery Act 2018 (Australia). This includes not using underage labor, as defined under applicable law, and not employing workers below the age of 18 in jobs that are likely to jeopardize their health and safety. The Company only uses voluntary labor and employees who have the proper work-related documentation, and is otherwise committed to taking steps to ensure compliance with those laws. This commitment applies to UKG and third parties with whom we work.



Reporting Concerns and Potential Misconduct

U Krewers play a vital role in promoting and maintaining our culture of compliance and reputation for integrity. Reporting concerns and potential misconduct is part of doing the right thing and embodies our expected behaviors of accountability, transparency, and honesty in dealing with difficult matters. It is also part of each U Krewers responsibility to the Company, our customers, and stakeholders, and each other.

If you have a concern or believe that an employee or representative of the Company has violated this Code or a Company policy, promptly contact:



Your Manager



Compliance Officer

ComplianceOfficer@ukg.com



HR Business Partner



UKG ReportingLINE

The **UKG ReportingLINE** accepts both web-based and telephone reports. The information you provide will be made available to authorized individuals within UKG, in a secure format. All reports may be made anonymously where permitted by local law.

UKG takes all reports that it receives seriously and treats everyone involved in the process in a manner consistent with our values. When an alleged violation of this Code or policy is received, the Company will take prompt action in accordance with the law and good business practices. Where appropriate, the Company may conduct an investigation. If the alleged misconduct involves a violation of the law or a significant corporate interest, a member of UKG's senior leadership, financial or accounting issues, or fraud, the matter must be reported immediately to UKG's

Chief Legal Officer. The Chief Legal Officer may engage or partner with Human Resources, Internal Audit, Global Security, the Audit Committee of the Board of Directors, or any appropriate external resources, to assist in investigating such a report. UKG may also refer certain matters to the appropriate governmental or regulatory authorities for investigation or prosecution. All U Krewers are required to cooperate fully with any investigation and reasonable efforts will be made to maintain the confidentiality of content relating to an investigation.

Additional Information:

- When reporting a concern or potential misconduct, please provide as many details as possible to ensure the matter can be reviewed thoroughly and promptly.
- If reporting anonymously through the UKG ReportingLINE, periodically check for communications and possible follow-up questions.

Non-Retaliation Policy

UKG strictly prohibits any form of unlawful retaliation against any U Krewer who reports a concern or potential misconduct in good faith or participates in the investigation of such a report. U Krewers who engage in retaliatory behavior may be subject to discipline up to and including termination.

Compliance Requirements

Failure to comply with this Code may result in disciplinary action, including reprimands, warnings, probation, or suspension without pay, demotions, reductions in salary, dismissal, and repayment. Any manager who directs or approves of conduct in violation of this Code, or who has knowledge of such conduct and does not report it promptly, may also be subject to disciplinary action up to and including dismissal.

Waivers of this Code of Conduct

If, for any reason, you believe that an exception to a principle or policy contained in the Code is appropriate, engage your manager and consult with your Human Resources Business Partner. Only UKG's Chief Legal Officer or Chief People Officer are authorized to grant exceptions.