## COEBC

Code of Ethical Business Conduct

concentrix



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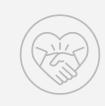




#### Introduction



Changing the game responsibly



Conducting business with integrity



Safeguarding our business



Commitments to our game-changers



Supporting global communities

## Living our culture

Our culture guides how we work, lead, and grow. It keeps us aligned, accountable, and committed to doing what's right.



### We are **not** here for the **status quo**

We break the mold to deliver exceptional outcomes for our clients, our people, and our shareholders.



## We are **changing the game** in our pursuit of **excellence**

We don't settle for average; we always seek that extra edge to achieve excellence.



## We are fighting for better brand experiences

We're passionate about crafting experiences that truly wow our clients and their customers.



## Championing our **people**

Our diverse team is our strength; we lift each other up to succeed together.



### Acting with integrity

Integrity guides us; we always do the right thing and build trust through honesty.



## Collaborating constructively

Teamwork fuels our success; we respect and learn from each other to achieve great results.



## Always with **exemplary character**

We pride ourselves on listening respectfully and representing our team with high standards.



### We win when our **clients win**

Our success hinges on our clients' success; we prioritize their needs for mutual growth.



### We are **One Team, One Company, One Concentrix**

Together, we are **one team, united by our values, driven by purpose, and committed to shared victories.** No matter where we are in the world, we support one another, act with integrity, and **move forward as One.** 





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## A message from our Concentrix leadership team

As we release our refreshed Code of Ethical Business Conduct (COEBC, our Code), we recognize that the global regulatory landscape and business environment that we operate in continues to evolve rapidly. No matter what happens around the world, what we believe and are committed to here at Concentrix has not changed. We hold ourselves to the highest ethical standards, not because we have to, but because it's the right thing to do. Our clients and partners trust us to act with integrity, responsibility, and respect—and that trust is something we value deeply. Our Code is not just about compliance or checking a box; it's about reinforcing the principles that define who we are.

Every day, we have the privilege of creating exceptional experiences for our clients and their customers. They trust us to conduct business on their behalf because they know we're dedicated to doing the right thing, always. Our Code provides the basic principles on the way we work and is designed to give us the essential resources and information needed to uphold our ethical standards, as every choice we make impacts our collective success.

Think of it as our way to reinforce our commitment to integrity and guide all gamechangers around the world regardless of career level and role. Our Code sets the gold standard for how we operate and is more important than ever so our clients can continue to count on us.

While our Code offers essential guidelines for us to follow, it can't replace good judgment. Instead of covering every potentially unethical situation we may encounter, the Code equips us with the principles to make informed choices that safeguard our business. By actively applying them, we protect ourselves, our business, our clients, and their customers.

I want to thank all of our game-changers for contributing to a safer environment in everything they do. Together, we're not just leaders in intelligent transformation but also the most trusted partner in our industry.

Respectfully,

**Chris**President & CEO





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## A message from our Concentrix leadership team

Game-changers,

At Concentrix, we take pride in the ethical foundation we've established. This foundation is essential to our success, our reputation, and our culture as a company that I am proud to be a part of. Our Code of Ethical Business Conduct (COEBC, our Code) is more than just a set of guidelines; it reflects our commitment to integrity, responsibility, and trust.

While our Code provides a framework for compliance and ethical decision-making, we understand that navigating complex situations can be challenging. If you observe any behavior that may not align with our Code or our values, I wholeheartedly encourage you to speak up. Your voice is not just important, it is essential to fostering a safe and accountable workplace where ethical practices thrive.

You can report concerns to your manager, reach out to our People Solutions team, or connect with our Legal and Compliance team. Additionally, you can access our ethics and whistleblowing website at <a href="https://www.integritycounts.ca/org/concentrix">www.integritycounts.ca/org/concentrix</a> to anonymously (in accordance with local laws) report any issues.

Thank you for being a crucial part of our commitment to ethical excellence.

Jane Fogarty EVP, Legal



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### Our code and you

Concentrix maintains an unwavering commitment to the highest ethical standards, ensuring transparency, accountability, and inclusiveness in all aspects of our business.

This Code of Ethical Business Conduct outlines how we, as a global technology and services leader, accomplish the critical task of continually upholding the ethical standards that make our Company a trusted integrated solutions partner for more than 2,000 clients around the world.

Central to our success is fostering a culture of continual awareness and integrity, and encouragement of sound judgment throughout our team.

We are One Team, One Company, One Concentrix!

#### Who our code applies to

Our Code applies to all game-changers at every level of the organization, our Board of Directors, and third parties, such as consultants, agents, and suppliers, acting with, or on behalf, of Concentrix.

In practical terms, our Code is our foundation, and it applies to every action we take. We all share the responsibility to uphold our Code, ethically and responsibly, every day.

#### Your responsibilities

Our Code outlines the expectations and guidelines for how we should conduct business. All game-changers are expected to act with integrity and to use sound ethical judgement, ensuring compliance with our Code and all applicable laws, rules, and regulations. If a local law conflicts with our Code, we follow the law; if a local business practice conflicts with our Code, we follow our Code.

While our Code discusses many areas of potential ethical or legal misconduct, it cannot possibly address every challenging situation that you may face. Our Code empowers you to make sound, ethical decisions and provides guidance on what to do and where to go when questions or concerns arise.

To demonstrate our continual commitment to abide by our Code, all game-changers are required to review our Code and certify acceptance and adherence to our Code upon joining the company, and every year after that.

We are counting on you to be an ethical champion for Concentrix!



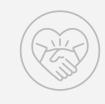




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### Our code and you (continued)

#### **Management Responsibilities**

Our leaders are the first line of defense for maintaining our culture of integrity and accountability. Managers are expected to lead by example through the following actions:

- Set a standard for behaviors that align with our culture and our Code.
- Be familiar with and promote the importance of complying with our Code.
- Create a safe and inclusive work environment.
- Encourage all game-changers to share concerns.
- Be alert and promptly report suspected violations of our Code.

#### **Board of directors responsibilities**

Our Board of Directors is responsible for annually reviewing and approving any changes to our Code.



#### **Exceptions**

Waivers of our Code are typically not allowed. However, our Board may, in exceptional cases, grant a limited waiver. Game-changers seeking a waiver must apply to their Geo Compliance Leader in writing, providing a clear and justified explanation. Requests with strong justifications will be evaluated by the Board based on the specific circumstances. If approved, waivers of the Code will be disclosed on our website as required by law.











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### Raising concerns

Most concerns you face at work can be resolved by speaking to and working with your manager or the People Solutions team. For ethical dilemmas or assistance in determining whether there is a problem, refer to the below 'Guidance on making ethical decisions'.

Yes



Is it legal?

No

whistleblowing website <u>www.integritycounts.ca/org/concentrix</u>



Is it consistent
with our
commitment to
acting with the
highest standards
of ethics and
integrity?

Yes

Does it harm our Company, clients, suppliers, shareholders, or our fellow game-

changers?

Contact your manager, senior leader in your business area, People Solutions,

or the Legal and Compliance team. Questions and concerns can also be

raised anonymously (in accordance with local laws) via our ethics and

**Unsure** 

No

Would I want my family, friends, co-workers or the public to read about this in the news?

No

**Unsure** 





Your decision appears to comply with our Code of Ethical Business Conduct (COEBC)







Do not proceed







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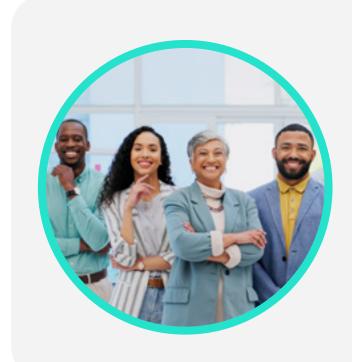
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### Raising concerns (continued)

For situations requiring escalation, multiple channels are available for reporting potential workplace misconduct, violations of this Code, other company policies, or applicable laws and regulations. We strongly encourage game-changers to help maintain our culture of integrity by reporting any actual or suspected misconduct using any of the following channels:



Your manager



The People Solutions team



The Legal and Compliance team

Additionally, questions or concerns can be reported to the Chairperson of the Audit Committee: <u>audit@concentrix.com</u>, or the Company's external legal counsel: Allison Leopold Tilley at Pillsbury Winthrop Shaw Pittman LLP, 2475 Hanover Street, Palo Alto, California, 94304-1114. Telephone: +1 650-233-4537, or anonymously, in accordance with local laws, via the Integrity Counts website, <u>www.integritycounts.ca/org/concentrix</u>.

The Company will respond appropriately to any such concerns or complaints reported through any of the above channels, and such response may include corrective or disciplinary action if it is determined that violations of our Code have occurred.

Every reasonable effort will be made, consistent with applicable laws and Concentrix policy, to maintain the confidentiality of any game-changer who reports in good faith a violation or suspected violation of our Code.

#### **Learn more**

Whistleblower Policy





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### Protection against retaliation

Our pledge to you is that Concentrix will not retaliate against any game-changer for raising a concern made in good faith.

Concentrix is committed to safeguarding and protecting any game-changer who raises a concern, whether actual, suspected, or perceived in good faith. All levels of management are responsible for ensuring a safe environment, free from retaliation, for anyone reporting a violation of our Code.

If you feel you have been retaliated against for raising a concern, contact the People Solutions team or Legal and Compliance team.

**Question:** I'm concerned about reporting suspected fraudulent activity. What if I am wrong and it gets me in trouble, or I damage someone's reputation?



**Answer:** We don't penalize game-changers in any way for reports made in good faith, even if incorrect or unable to be proven and regardless of the game-changer's role or position in the Company. Investigations of potential wrongdoing are conducted in an objective manner, and we strive to maintain confidentiality as best we can and to ensure that game-changers' reputations are protected.



Complying with our Code is a commitment we make to each other every day. Failure to abide by our Code hurts all game-changers by damaging the reputation of Concentrix and our clients and putting the success of our business at risk. Failure to comply with our Code will lead to corrective measures, up to and including termination of employment, and could result in legal action.





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### We compete fairly in business

Concentrix is committed to free and fair competition. We compete based on the quality of our services, and never through unethical means. We deal fairly and in good faith with our clients, competitors, and suppliers. No employee, director, or officer should gain unfair advantage through manipulation, concealment, misrepresentation, or abuse of privileged information.

We focus on delighting clients, not restricting competitors through deceitful or fraudulent actions. When interacting with competitors we must use caution and never discuss any of the following without prior approval from the Legal and Compliance team:

- Pricing, costs, marketing, or strategic plans.
- Proprietary or confidential information
- Technological improvements or client promotions.
- Division of clients, markets, or territories.
- Boycotts of clients, suppliers, or competitors.

At times, we may partner with companies, who may also be competitors, to complement our offerings and enhance the solutions that we bring to the market. In these circumstances, we should limit our collaboration to the complementary activities and avoid any discussions as to our competitive activities.

#### What this means for game-changers

- Always promote Concentrix services and capabilities in an honest and ethical manner.
- Avoid any activities that are unethical and could break competition laws, such as using questionable means to gather information about competitors.









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### We don't engage in bribery or corruption

Concentrix has a zero-tolerance policy for bribery and corruption. No game-changer, agent or third party acting on our behalf may ever make, accept, or offer any form of improper payment in order to obtain or retain business or otherwise secure an improper advantage. We abide by all international laws, treaties, and regulations that forbid bribery, including the U.S. Foreign Corrupt Practices Act (FCPA), and Anti Bribery laws in the UK, France and Latin America.

Almost every country prohibits the bribery of its government officials, which may include employees of enterprises that are government controlled or owned. In addition, some countries have laws that make it illegal to bribe officials of other countries.

The priority we place on transparency and integrity extends to the third parties that we work and partner with. We are committed to working with potential partners, clients, suppliers, and service providers who align with our values and ethical guidelines, and we conduct thorough due diligence to ensure their compliance with legal and ethical standards. Our comprehensive evaluations of third-party entities include assessing their business practices, financial stability, and adherence to regulatory requirements. We also require our suppliers to abide by our Supplier Code of Conduct.

Question: You need to obtain government approval for a project as quickly as possible. The government employee you contact offers to speed up the approval process for a "small fee." Can you make this payment to speed up the approval process?



**Answer:** No. This is known as a "facilitation payment" and is prohibited by law, this Code and our compliance policies. You may not offer to make any payment to facilitate government approvals, even if it will speed up a project. You must notify your manager and the Legal and Compliance team of this request for a facilitation payment.

#### What this means for game-changers

- Never offer, promise, give, request, agree, accept or receive any bribe or improper payment.
- Report any demand for a bribe or improper payment to the Legal and Compliance team.
- Obtain approval from the relevant level of management and your Geo Compliance leader before providing any gift or payment to any government or public official.

#### **Learn more**

**Anti Bribery and Ethics Policy** 

Global Supplier Code of Conduct

Third-Party Due Diligence Policy











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## We manage any actual or potential conflicts of interest

We are all committed to acting in the best interest of our Company at all times. Conflicts of interest can occur when personal or private interests—whether yours, those of a family member, or close personal associates—might influence your decisions and the impartiality of your professional responsibilities.

It's important to steer clear of any interests or associations that could compromise, or even appear to compromise, your ability to exercise independent judgment in our Company's best interests.

There is a potential conflict of interest if you:

- Cause our Company to engage in business transactions with relatives or friends.
- Use non-public Company, client, or vendor information for personal gain by you, relatives, or friends (including securities transactions based on such information).
- Have a financial interest in our Company's vendors, clients, or competitors.
- Compete, or prepare to compete, with our Company while still employed by our Company.

In most cases, potential conflicts can be easily resolved once they are brought into the open and discussed. Early discussion with your manager and the People Solutions team and logging the potential conflict via our Compliance Portal, facilitates the resolution of potential conflicts before they affect our work or our reputation. Concentrix may ask you to excuse yourself from certain decisions or add an approval step in the process if there is a possible conflict of interest between yourself and the matter being discussed or approved.

**Question:** I am in a supervisory role, and my cousin has recently applied for a role in my department. How do I manage this relational conflict of interest?



**Answer:** You should disclose the familial relationship to your manager and People Solutions team. It's important to maintain transparency and fairness in the hiring process. It is likely that you will be directed to excuse yourself from the decision-making process for this particular candidate to avoid any potential or apparent conflict of interest.









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## We manage any actual or potential conflicts of interest (continued)

**Question:** I have recently started a side business that provides consulting services, and one of my potential clients is a supplier Concentrix works with. Could this situation be a conflict of interest?



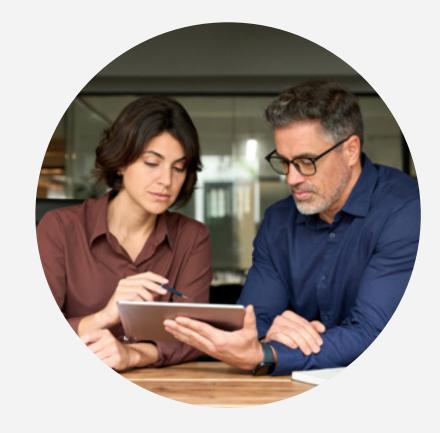
**Answer:** Yes, this could potentially be a financial conflict of interest. Engaging in a business relationship with a company that supplies Concentrix could affect your objectivity and decision-making. It is important to disclose this situation to your manager, the People Solutions team, or to the Legal and Compliance team. They will help assess the situation and determine the best course of action to avoid any conflicts and ensure transparency and fairness in business dealings.

#### What this means for game-changers

- Report actual or potential conflicts as soon as possible and as they arise.
- Never exploit your relationship with Concentrix for personal gain, for example, by using information you've acquired as part of your work.

#### **Learn more**

Conflict of Interest Policy











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## We decline any gestures that influence or appear to influence business decisions (gifts & hospitality)

Integrity and adherence to the highest ethical standards are core to our values. Business gifts, hospitality, and entertainment can foster goodwill in professional relationships, but may also create challenges in maintaining objectivity. Our decisions regarding suppliers, clients, vendors, and partners must be based on objective factors such as cost, quality, and value. Business gifts and hospitality, whether given or received, must never improperly influence business decisions, and we must avoid situations that have even the appearance of impropriety.

#### Guidelines for giving and receiving gifts and hospitality

You may offer or receive gifts or hospitality when the following criteria are met:



There is a clear business purpose.



It is legal and complies with applicable local and international laws.



The cost is reasonable, not excessive or lavish.



It is socially acceptable and aligns with common business practices.



It is not in the form of cash or cash equivalents (e.g. gift certificates).



It is not solicited or linked to any reciprocal arrangements.





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We decline any gestures that influence or appear to influence business decisions (gifts & hospitality) (continued)

#### **Special considerations for public officials**

Exercise caution when dealing with public officials or employees of government-controlled companies. Don't forget that many utility companies may be wholly or partially government-owned. Even if they appear to operate like private companies, their officials are considered public officials — and special considerations apply when interacting with them.

Most jurisdictions prohibit or restrict offering or receiving any form of gifts or hospitality to public officials. Even small gestures such as meals or refreshments may violate laws. Always consult the Legal and Compliance team before offering or receiving anything of value to public officials. Violations can lead to civil or criminal penalties for you and Concentrix.

#### What this means for game-changers

- Record gifts and hospitality given or received via the Compliance Portal.
- Refer to our Gifts and Hospitality Policy for further information, including where manager and Compliance approvals are required.
- Return or politely decline unacceptable gifts and hospitality that do not meet the criteria above or handle them in consultation with your manager and the Legal and Compliance team.

#### **Learn more**

Gifts and Hospitality Policy







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### We don't engage in insider trading

You may come across material, non-public information about Concentrix or its business partners (e.g. clients or vendors) in the ordinary course of your work for the Company. It is important to understand that it is illegal to buy or sell Concentrix stock or other securities based on such information, commonly known as insider trading. Engaging in insider trading can result in job loss and severe legal penalties.

Additionally, sharing this information with someone who trades based on the information can also result in convictions for insider trading, leading to legal consequences for both you and the individual to whom you gave the information. Our Insider Trading policy supports game-changers in understanding and complying with insider trading rules.

#### **Key definitions**

- Non-public information: Internal company knowledge not yet publicly disclosed.
- Material information: Any information that could influence an investor's decision to buy or sell Concentrix stock or other securities.

If you have access to material, non-public information, you must wait **at least two (2) full trading days** after it has been made public before executing any trades. Consult the Legal and Compliance team if you are unsure about insider trading restrictions.

#### What this means for game-changers

• Never use or share material, non-public information about Concentrix or other companies we do business with, for personal gain.

#### **Learn more**

**Insider Trading Policy** 







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### We manage and maintain accurate records

#### **Maintaining accurate records**

Full, fair, accurate, timely, and understandable disclosures in our public disclosures and regulatory filings are essential to the success of our business. We must ensure that all financial records honestly reflect our operations and financial position by complying with Concentrix policies and applicable laws and regulations.

#### **Managing our records**

Omply with applicable laws and regulations.

Be properly documented, recorded in the correct account and period.

Accurately reflect transactions, assets, liabilities, revenues, and expenses.

Align with internal accounting controls.

Be free of false or misleading entries and intentional misclassification.

Be available for audit review, with full cooperation from employees.

Game-changers must adhere to the company's system of internal accounting controls and fully cooperate with internal and external auditors to support the accuracy and reliability of our financial records.

Company records are subject to various legal, regulatory and business retention and disposal requirements, including our Records Retention Policy. These requirements apply to all forms of records, including paper documents, emails, videos, and electronic storage devices. Records must be stored securely and disposed of appropriately to comply with these requirements and avoid unnecessary costs and inefficiencies.

If litigation, audits, court orders, or investigations are pending or anticipated, all relevant records must be preserved. The Legal and Compliance team may issue a 'Preservation Notice' or legal hold requiring specific documents or information to be retained without alteration or destruction. Game-changers must comply with all related instructions.

Game-changers must adhere to the company's system of internal accounting controls and fully cooperate with internal and external auditors to support the accuracy and reliability of our financial records.

#### What this means for game-changers

• If you are unsure about whether to retain or delete a record, consult the **Records Retention Policy** or seek guidance from the Legal and Compliance Te

#### **Learn more**

Records Management Policy





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## We adhere to trade controls and restrictions

#### **Trade controls**

As a global company, we regularly deliver services, software, and technology across borders, making it essential to comply with national and international trade laws. Many countries regulate imports, exports and re-exports, impose trade sanctions, or require licenses based on national security, foreign policy, or humanitarian concerns. Violations can lead to severe legal and financial consequences.

To ensure compliance, we must carefully monitor international transactions to identify any prohibited destinations, end-users, or end-uses. Given the complexity of these regulations, you should seek guidance from the Legal and Compliance team before engaging in export or import activity.

#### **Economic sanctions**

We are prohibited from conducting business with any person or entity listed in the U.S. Department of the Treasury's OFAC lists and other similar sanctions and watch lists around the world. These restrictions are imposed by governments and international organizations to combat illegal activity, including terrorism and money laundering.

The Legal and Compliance team oversees the due diligence process for potential business partners to ensure we are not conducting business with restricted individuals or entities. For more information, please refer to the Economic Sanctions Policy or contact the Legal and Compliance team.

#### **Learn more**

**Economic Sanctions Policy** 

Anti Money Laundering Policy





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## We protect our assets and use technology appropriately

#### We protect company assets

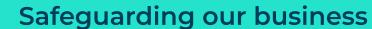
All game-changers must diligently protect Concentrix property, including computers, office equipment, supplies, real estate, software, confidential information, and intellectual property. You must not use Concentrix property for personal use and must secure it within your control to prevent loss, damage, theft and misuse. Upon request or termination of your employment, you must return all Company property, including data and intellectual property.



#### Did you know?

To the extent allowed by applicable law, Concentrix has the right to monitor game-changer use of company assets. This oversight ensures compliance with company policies, safeguards company assets and information, and maintains a safe work environment.





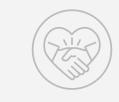




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## We protect our assets and use technology appropriately (continued)

#### We use technology appropriately

We all have a duty to use technology in a safe, ethical, lawful, efficient, and productive manner. Technology should be used for legitimate business purposes and must not interfere with your job duties. In addition, you may not use Concentrix systems or technology to conduct business for yourself or for another organization (other than the use of approved systems and technology for Concentrix clients or other business partners).

Concentrix computer and network systems should never be used to communicate, store, or view unlawful, sexually explicit, discriminatory, threatening, abusive or otherwise inappropriate information.

Unauthorized, inappropriate or unlawful use, relocation, or transfer of Concentrix technology, including computers, data, software, or telecommunication resources may result in disciplinary and legal action.

We must also integrate new technology in our business in a responsible manner, with careful consideration of the technology's effectiveness and its impact on the wellbeing, security, and privacy of our game-changers, clients and communities.

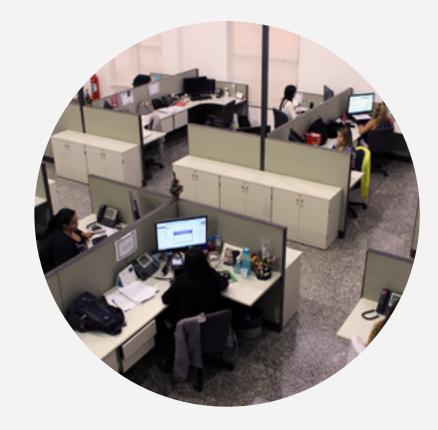
All game-changers should consult with our Information Technology team on the adoption or implementation of any new technology.

#### What this means for game-changers

- Protect Concentrix property and use it only for legitimate business purposes.
- All assets are the exclusive property of Concentrix and must never be left unattended or used by another party.
- If you suspect theft or misuse of company property, report the situation immediately by contacting <u>alertus@concentrix.com</u> or country/region specific Confidentially Speaking email.

#### **Learn more**

Physical and Information Security Policy











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### We safeguard our information

We recognize the ever-growing threat of cyber-attacks and information security breaches our company faces and the necessity to be vigilant in countering these serious global threats. As such, it is incumbent upon all game-changers to be aware of, and understand, their responsibility in protecting company and client assets, information and information systems by identifying these security threats and how to combat them securely and safely.

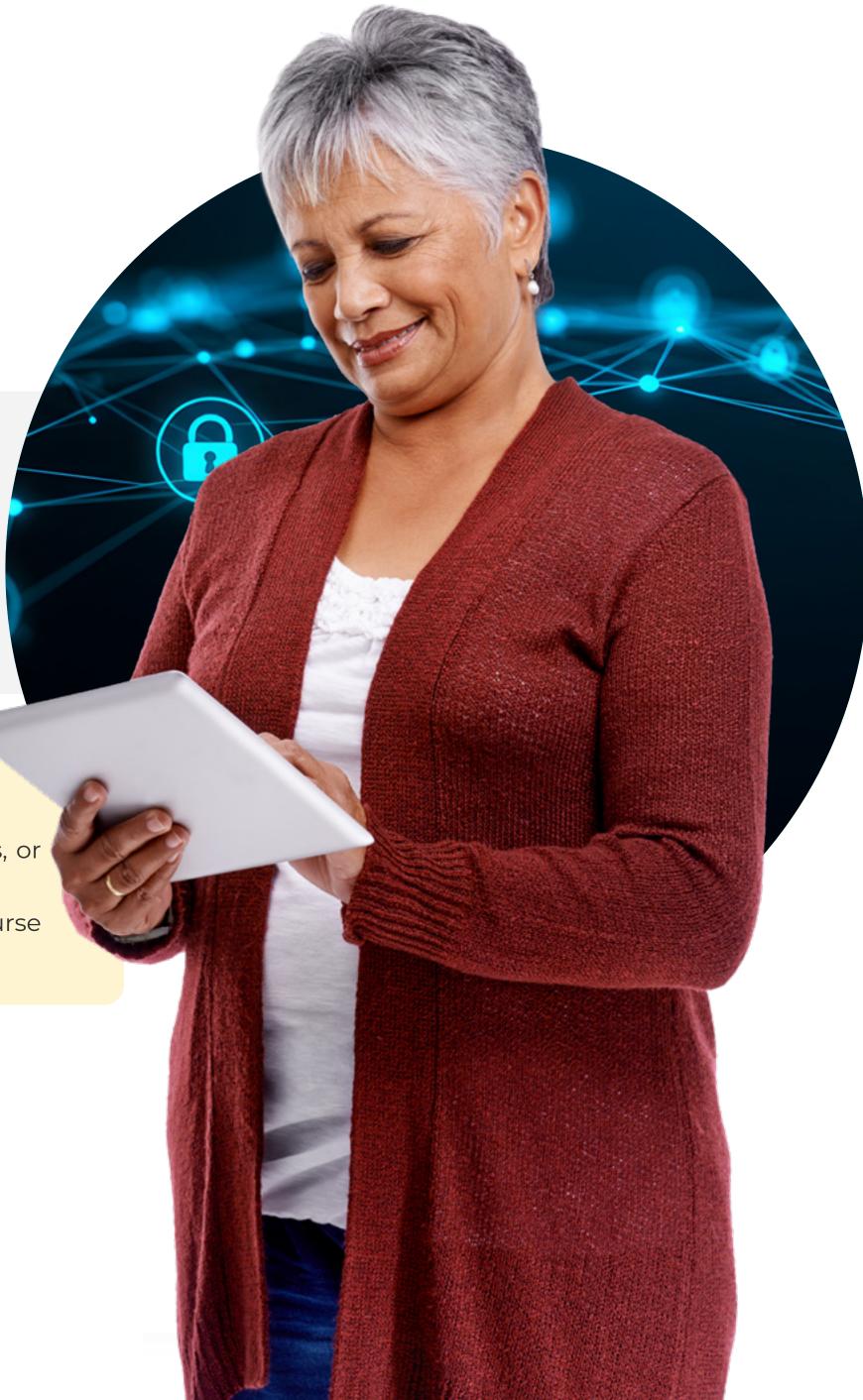
#### How to report an issue

Threats, or suspected threats, should be immediately reported using one of the following.

- report.phish@concentrix.com
- <u>alertus@concentrix.com</u>

#### What this means for game-changers

- Be vigilant. We all have a critical role to play in understanding, identifying and reporting threats, or potential threats.
- All game-changers are required to complete the annual Information Security and Data Privacy course within CNX University.









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### We protect our intellectual property and confidential information

Protecting our intellectual property and other confidential and proprietary information is of critical importance to the sustained success of our business. Every game-changer has an obligation to ensure that these assets are not misused or misappropriated.

Whether during or after employment with Concentrix, you must never use or disclose proprietary Concentrix information externally. Similarly, any proprietary information that you possess from a former employer is subject to similar confidentiality obligations and cannot be used or shared with Concentrix.

Protecting proprietary information and intellectual property extends to third parties with whom we conduct business. You may have access to information that others consider confidential, including client business strategies or system configurations, and end-customer data. This information is subject to strict confidentiality restrictions, and it is incumbent on all game-changers to maintain the confidentiality of this information.

On occasion, we may be required to share Concentrix intellectual property externally. Such disclosures require prior approval from the Senior Executive Team and a written confidentiality agreement approved by the Legal and Compliance team.

#### Ownership of work during employment

All intellectual property created by game-changers during employment with Concentrix is the property of Concentrix. For this purpose, intellectual property means all works of authorship, technology, ideas, inventions, discoveries, concepts, or any other work product or development of any nature that are created, prepared, produced, authored or edited at any time during a game-changer's employment with Concentrix, that are related in any way to the business operations of the Company. Intellectual property also includes any and all rights, copyrights, trade secrets, trademarks, patents, and other intellectual property rights in any jurisdiction throughout the world.

The annual sign-off of this Code by you is an acknowledgement of your understanding of the company's intellectual property rights described above.

**Question:** I just joined our Company as a new game-changer. My prior employer is one of our Company's largest competitors. Can I share some important confidential marketing information that I developed while working for this competitor?



**Answer:** No. This would violate our Code, your confidentiality obligations to your previous employer, and may also be a violation of law. You are obligated to protect your past employer's confidential information just as Concentrix game-changers are required to protect our confidential information.

#### **Learn more**

Data Privacy Policy





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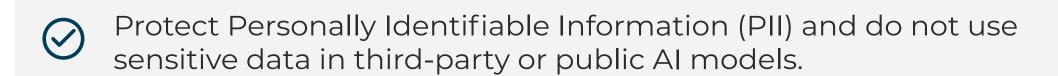
Supporting global communities

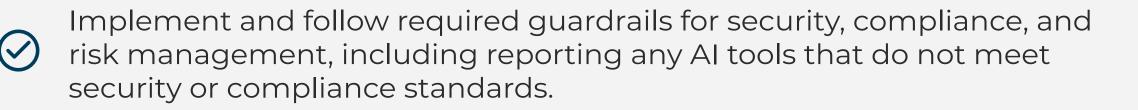
## We use artificial intelligence responsibly

As a responsible business, we are committed to the ethical acquisition, development, and use of Artificial Intelligence (AI) and Generative AI (GenAI). We uphold strict standards of integrity, transparency, and accountability, ensuring that all AI technologies are governed by robust oversight of our AI Governance Committee and comply with legal and regulatory requirements. The protection of personally identifiable information (PII) is paramount, and all activities involving AI are conducted with respect for privacy, fairness, and client-specific contractual obligations.

#### **Obligations when using Al**







#### **Learn more**

**Generative AI Statement** 









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## We don't communicate on behalf of Concentrix without permission

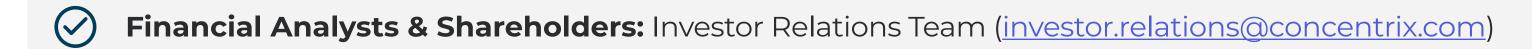
It is critical for Concentrix to provide fair, accurate and timely disclosures to the public, the media, governmental authorities, and other stakeholders. Numerous external communicators can create conflicting and confusing messages, and inexperienced external communicators can more readily have their words misunderstood or taken out of context by members of the media or other external organizations. For these reasons, only designated spokespeople are approved to respond or communicate on behalf of Concentrix in any way, including with outside parties such as members of the media, industry analysts, and investors.

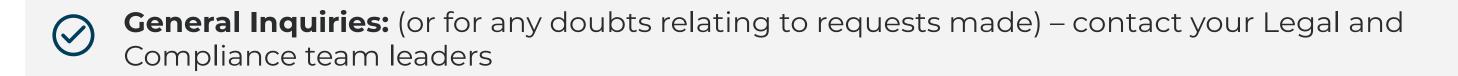
#### **Contact guidelines**

Any requests for information or comments in any form from an external party should be immediately forwarded to the appropriate team for their handling.

#### Requests relating to:









Please also check with the Global Marketing and Communications Team for applicable guidelines and rules regarding brand usage and corporate communications.











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## We use social media conscientiously

We recognize the ever-growing threat of cyber-attacks and information security breaches our company faces and the necessity to be vigilant in countering these serious global threats. As such, it is incumbent upon all game-changers to be aware of, and understand, their responsibility in protecting company and client assets, information and information systems by identifying these security threats and how to combat them securely and safely.

#### We protect our clients

Game-changers must never disclose confidential and/or proprietary information about our clients or their customers. Additionally, we should also protect client confidentially by not disclosing client names, logos, and any information that could cause harm to a client's reputation or brand.

#### Did you know?



Even if you delete a post, it may already have been viewed or shared by others and its contents may still be available online. If you post something confidential, you should notify the Legal and Compliance team or the Global Security team as soon as possible, even if the post has been deleted.



We reserve the right to remove any comments or posts made to Company social media channels/pages that violate this policy or that, in our sole discretion, we consider objectionable, disruptive, misleading, inappropriate, off-topic or threatening.







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## We use social media conscientiously (continued)

#### When posting to social media ask yourself?



Does my post violate the Concentrix social media guidelines?



Does my post disclose confidential or proprietary client information?

Question: I was recently assigned to a team that supports a client's new, exciting product. Last night I was so excited about the new role that I posted the information, including the client's name, on LinkedIn. Is this a violation of our Company's policy?



Answer: Yes. We understand your right to engage in social networking, such as posting information on LinkedIn. However, our policy specifically prohibits the posting of confidential Company information on social networking applications and in this instance, posting of the client's name and product is prohibited.

#### **Learn more**

Social Media Policy





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## We protect human rights throughout our global operations

We uphold fundamental human rights across our global operations. As a worldwide enterprise, we have a responsibility to act ethically in every community, client engagement, and partnership. We demonstrate our commitment to this responsibility by respecting human rights and complying with laws on wages, working hours, child labor, human trafficking, modern slavery, and workplace safety. This commitment is embedded in our Code, our Human Rights policy, labor relations, employment practices, and in our supplier relationships.

#### **Learn more**

**Human Rights Policy** 













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### We value inclusion and belonging

We are committed to an inclusive and innovative culture, celebrating our diversity and talent, and we put a high value on the unique backgrounds, experiences and ideas of all of our game-changers, clients, and business partners.

We promote belonging to enable every game-changer to bring their best self to work. Teamwork fuels our success, and we respect and learn from each other to change the game in pursuit of excellence.

We foster fairness and a merit-based workplace without bias, including through our recruiting and hiring practices, personal development and advancement opportunities.

#### We prohibit discrimination and harassment

Our Company has zero tolerance for workplace discrimination or harassment, and we all play an important role in ensuring a safe and healthy workplace where everyone is treated with dignity and respect.



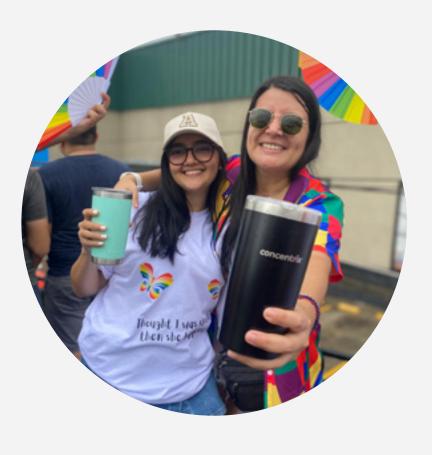
**Discrimination** means any unjust or prejudicial treatment of any protected groups on the basis of their protected characteristics or status, which includes: race, national origin, religion, color, pregnancy, age, sex, gender, gender identity, physical or mental disability, veteran status, sexual orientation, or marital status



**Harassment** means any unwanted offensive or humiliating comments or behavior towards a person that causes mental or emotional suffering, which includes unwanted contact, insults, threats, touching or offensive language.











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### We value inclusion and belonging (continued)

#### Did you know...

- Harassing behavior may include the following: Verbal or physical abuse, threats, derogatory remarks, jokes, innuendo or taunts about appearance or beliefs.
- Unwanted physical contact such as touching, patting, pinching, punching and outright physical assault.

The display of pornographic, racist or offensive images.

Unwelcome invitations or requests, either indirect or explicit.

- Practical jokes that result in awkwardness or embarrassment.
- Intimidation, leering or other objectionable gestures.

**Question:** I am being teased about my religious beliefs by another gamechanger, and I consider it harassing behavior. What should I do?



**Answer:** If you feel safe and comfortable, notify your co-worker that their comments are not welcome or acceptable and that, if continued, it will be reported. Otherwise, you should report the incident to your manager or People Solutions team. You can also submit a complaint at www.integritycounts.ca/concentrix. Your report can be confidential, and you may remain anonymous in accordance with local laws; however, it is important to understand that it can be difficult and, in some cases, impossible for the Company to investigate an anonymous report while ensuring the complete anonymity of the complainant.

#### What this means for game-changers

• Any game-changer who believes a violation of the policy on Equal Employment Opportunity has occurred should immediately report the issue to their manager, their People Solutions team, or via our ethics and whistleblowing website: <a href="www.integritycounts.ca/org/concentrix">www.integritycounts.ca/org/concentrix</a>.

#### **Learn more**

Inclusion and Belonging Policy

**Equal Employment Opportunity Policy** 







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### We operate a safe and healthy workplace

We strive to provide healthy and safe conditions on our premises by complying with applicable regulations and best practices. We aim to provide an environment with no risk to our game-changers' health and safety and minimize noise, dust, odors, particles and other sources of location pollution.

While ensuring safe working conditions is important, our approach to game-changer wellbeing goes beyond compliance. We strive to mitigate wellbeing-related risks such as burnout and chronic stress by focusing on early identification and seeking the right interventions and solutions to address them. A key part of our work is also enabling leaders to lead with empathy and create supportive, psychologically safe environments where game changers can feel safe and supported on a day-to-day basis.

#### We don't tolerate violence, threats of violence or harassment in the workplace

Concentrix prohibits all forms of violence - whether physical, verbal or threatened - against other game-changers, visitors, or anyone on our premises or in contact with our game-changers in the course of their duties. We take any threat or act of violence seriously, and any such threat or act should be reported immediately to your manager or to the People Solutions team.

#### Working while under the influence of drugs or alcohol is prohibited

To provide a safe work environment for all game-changers and to deliver experiences that wow our clients and their customers, we never work while under the influence of alcohol, illegal drugs, misused prescription drugs, or medications that impair our ability to perform our jobs safely and effectively.

The use, possession, exchange, or sale of illegal drugs, or alcohol, during working hours or while on Company premises is strictly prohibited, as is abuse of prescription drugs. This prohibition does not include the use of alcohol at certain limited company celebrations or social events where alcohol may be served in moderation if pre-approved by country management.

#### **Learn more**

Prohibiting Harassment Discrimination Retaliation Policy













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### We protect our game-changers' information

Our Company is committed to respecting the confidentiality of our game-changers' personal data and handle it in line with the following key principles:

- Maintain accurate and up-to-date game-changer records.
- Allow access to and use of personal information only for legitimate business purposes (e.g., payroll and benefits administration), and only to those with proper authorization.
- Prevent disclosure to third parties unless permitted by our policies.
- Adhere to established data retention and disposal policies and procedures.
- Respond promptly to any questions or concerns raised by game-changers regarding their records.
- Comply with any applicable data privacy laws.

**Question:** What types of personal and sensitive data does Concentrix handle, and how is it treated?



Answer: Personal data includes any information that can identify an individual, such as names, addresses, and contact details. Sensitive data may include health information and other data that requires additional protection. Concentrix treats all data with the utmost care and security and in compliance with applicable data privacy laws.

#### What this means for game-changers

- All game-changers are expected to comply with our privacy and information security policies and procedures, as well as applicable laws on the unauthorized disclosure of personal information.
- If you have any questions about your personal information, please reach out to your manager or to the People Solutions team.

#### **Learn more**

**Privacy Policy** 









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### We operate a sustainable business

Sustainability is the capacity to meet current needs without compromising the ability of future generations to fulfill their own needs. Operating a sustainable business involves striking a balance among environmental, social and economic considerations to ensure that our financial objectives are achieved, while also safeguarding the wellbeing and resilience of our planet, our people and our communities to support a world in which Concentrix and its game-changers can continue to thrive.

We remain steadfast in our commitment to sustainability, including our goal to reduce our carbon footprint with a vision to achieving Net Zero by 2050. As regulatory sustainability requirements evolve, we remain committed to full compliance with applicable laws and proactive adaptation to stay ahead of the curve. Through strong partnerships with internal and external stakeholders, we will continue to drive meaningful change and contribute to a more sustainable future.

To read more about ESG strategy and our latest sustainability progress and achievements, please visit <a href="www.concentrix.com/esg">www.concentrix.com/esg</a> and read our latest Sustainability Report.

#### We are committed to minimizing our environmental impact

We are a global company with many game-changers in communities in every region of the world. As part of our sustainability initiatives, we are deeply committed to environmental protection and stewardship, and we strive to operate in ways that minimize our environmental impact, while supporting initiatives that contribute to the regeneration of our planet.

To this end, we prioritize the following actions across our company:

- 1. Assessment of our environmental performance against our environmental goals and mitigation of our impact, especially our carbon footprint.
- 2. Training and promotion of game-changers' awareness on environmental best practices.
- 3. Efficient waste management practices that incorporate the 5R principles of waste management (Refuse, Reduce, Reuse, Repurpose, and Recycle).
- 4. Efficient and renewable energy use in our facilities.
- 5. Promotion of the use of recycled and sustainable materials throughout our operations. Partnership with environmentally sustainable suppliers; and compliance with applicable environmental regulatory and statutory requirements.

#### **Learn more**







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## We give back through our community initiatives

Empowering communities where we operate is a key element of our ESG initiatives. Our giving back philosophy revolves around four key giving actions: giving voice, giving money, giving time and giving things. Our teams around the globe sponsor charitable activities, and company contributions and donations support these activities.

Game-changers may engage in charitable activities, in order to give back to the communities they belong to. While Concentrix recognizes the importance of giving back to our communities, an individual's personal charitable activities are not performed on behalf of Concentrix, and Concentrix does not reimburse game-changers for the time and cost incurred to support an individual's charitable activities.

#### What this means for game-changers

- Ensure that no charitable donation by Concentrix is made to an individual or organization whose goals and values are incompatible with our culture.
- Never make charitable contributions or donations where there is a demand or expectation of a business return.

## We are not a political or religious organization

Concentrix is an apolitical business. We don't endorse or contribute to any political party, candidate, or cause, and we don't encourage or facilitate political activity by compensating or reimbursing our game-changers to take such actions. Our company also maintains a policy of impartiality in relation to religion and religious practices and beliefs.

We fully recognize game-changers' rights, as individuals, to voluntarily participate in political causes and religious activity, including through personal contributions of time and money. Your personal political and religious activity, however, must never create the perception that you are, in any way, acting on behalf of Concentrix.

#### What this means for game-changers

• Do not use company property, time or resources in support of a political party or cause.















# We do the right thing. Always.