March 23rd, 2026

Inflectra Corporation Anti-Corruption and Anti-Bribery Policy

Policy Owner: Inflectra Corporation
Applies To: All employees, officers, directors, contractors, consultants, agents, resellers, distributors, channel partners, and other persons acting on behalf of Inflectra
Last Reviewed: March 23rd, 2026

1. Purpose

Inflectra Corporation ("Inflectra") is committed to conducting business ethically, honestly, transparently, and in compliance with applicable anti-bribery and anti-corruption laws.

As a United States-based software company serving customers and working with partners throughout the world, Inflectra may operate in jurisdictions with different business practices, customs, and legal requirements. Regardless of local custom, Inflectra prohibits bribery and corruption in connection with any aspect of its business.

This Policy establishes the standards that employees and persons acting on Inflectra's behalf must follow when interacting with customers, prospects, government officials, business partners, suppliers, resellers, distributors, consultants, and other third parties.

2. Scope

This Policy applies worldwide to:

- Inflectra Corporation and any subsidiaries or controlled entities;
- all directors, officers, and employees, whether permanent, temporary, full-time, or part-time;
- contractors and consultants acting on Inflectra's behalf;
- sales agents, representatives, distributors, resellers, referral partners, and channel partners when conducting business for or representing Inflectra; and
- other third parties authorized to act on Inflectra's behalf.

Inflectra expects its business partners to maintain standards of ethical conduct consistent with the principles of this Policy.

Where applicable local laws impose stricter requirements than this Policy, the stricter requirements must be followed.

3. Applicable Laws

Inflectra conducts its business in accordance with applicable anti-corruption and anti-bribery legislation, including, where relevant, the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010, and applicable anti-corruption laws in countries where Inflectra conducts business.
Because Inflectra conducts international business, conduct occurring outside the United States may still be subject to U.S. law or the laws of other jurisdictions.
Employees and representatives are not expected to independently determine which anti-corruption statute applies to a particular transaction. When there is uncertainty, the matter should be referred to Inflectra management or designated legal or compliance personnel before proceeding.

4. Zero Tolerance for Bribery

Inflectra prohibits directly or indirectly offering, promising, authorizing, requesting, providing, accepting, or receiving a bribe or other improper advantage.
No person covered by this Policy may give, offer, promise, authorize, solicit, or accept anything of value for the purpose of:

- improperly influencing a person's decision or conduct;
- obtaining or retaining business through improper means;
- securing an improper commercial, regulatory, or governmental advantage;
- influencing a procurement or tender process improperly;
- causing someone to misuse their position;
- rewarding someone for having improperly performed their duties; or
- inducing someone to act contrary to their legal, contractual, or professional obligations.

This prohibition applies to dealings with both government officials and private-sector organizations and individuals.
A transaction does not become permissible simply because bribery or similar conduct is considered customary in a particular country or industry.

5. What Is a Bribe?

A bribe can involve anything of value and is not limited to cash.
Examples can include:

- cash or cash equivalents;
- excessive or inappropriate gifts;
- meals or entertainment;
- travel or accommodation;
- personal discounts;
- commissions or referral payments;
- charitable contributions;
- political contributions;
- employment, internships, or consulting opportunities;
- favors provided to family members or associates;
- free software, services, licenses, or support;

- excessive discounts or rebates;
- loans;
- sponsorships;
- confidential information; or
- any other personal, financial, or commercial benefit.

The value of an item does not by itself determine whether it constitutes a bribe. The intent, circumstances, recipient, timing, transparency, and business purpose must also be considered.

6. Government Officials

Interactions with government officials present heightened anti-corruption risks and require particular care. For purposes of this Policy, "government official" should be interpreted broadly and may include:

- elected or appointed officials;
- employees of national, regional, state, provincial, municipal, or local governments;
- employees of government departments or agencies;
- employees or representatives of state-owned or state-controlled enterprises;
- military personnel;
- judges and court officials;
- officials of public international organizations;
- political party officials;
- candidates for political office; and
- persons acting officially on behalf of any of the above.

In some countries, organizations that appear to operate as ordinary commercial businesses may be partly or wholly government-owned. Employees should not assume that someone is a private-sector customer merely because they work for a commercial enterprise.

No payment or benefit may be provided to a government official to improperly influence an official act, secure business, obtain favorable treatment, accelerate an approval, influence a procurement decision, or obtain any other improper advantage.

7. Facilitation Payments

Inflectra prohibits facilitation or "grease" payments.

Facilitation payments are typically small unofficial payments made to government personnel to accelerate or secure routine governmental actions, such as issuing permits, processing paperwork, providing utilities, or completing administrative procedures.

Even where a facilitation payment may potentially fall within a narrow exception under a particular law, Inflectra personnel must not make such payments.

An exception may apply where a payment is necessary to address an imminent threat to a person's health or physical safety. Any such payment must be reported to Inflectra management as soon as reasonably possible and accurately documented in the Company's records.

8. Gifts, Meals, Entertainment, and Hospitality

Reasonable and legitimate business hospitality can be appropriate when it supports a genuine business relationship. However, gifts, meals, entertainment, travel, and hospitality must never be used to improperly influence a business or governmental decision.

Any gift or hospitality provided or received must:

- have a legitimate business purpose;
- be reasonable and proportionate;
- comply with applicable law;
- comply with the recipient organization's policies where known;
- not create or appear to create an obligation;
- not be intended to influence a pending purchasing, contracting, regulatory, or procurement decision improperly;
- not consist of cash or a cash equivalent;
- not be lavish, excessive, or frequent; and
- be accurately recorded where company funds are used.

Particular caution must be exercised when providing anything of value to a government official or an employee involved in a public procurement process.

Employees should seek management approval before providing significant hospitality, travel, accommodation, or gifts where circumstances could reasonably create an appearance of improper influence.

9. Travel and Expenses for Customers and Other Third Parties

Inflectra may occasionally pay reasonable travel or related expenses for customers, prospective customers, partners, speakers, or other third parties when there is a legitimate business purpose, such as participation in a conference, training program, meeting, or product demonstration.

Such expenses must be reasonable, directly related to the legitimate business purpose, appropriately documented, and not provided as a personal benefit.

Inflectra should normally make payments directly to travel providers rather than giving funds to an individual whenever practical.

Travel expenses for government officials require additional scrutiny and should receive advance management approval.

10. Discounts, Commissions, Rebates, and Partner Payments

Because Inflectra conducts business through international partners, resellers, distributors, and other channel relationships, discounts and commissions require appropriate oversight.

Discounts, commissions, rebates, referral fees, marketing development funds, and similar payments must:

- be commercially reasonable;
- relate to legitimate products or services;
- be documented in an appropriate agreement or business record;
- be paid to the legitimate contracting party;
- not be used to create undisclosed funds;
- not be redirected to government officials, customer employees, or other unauthorized persons; and

- be accurately recorded in Inflectra's financial records.

Unusually large discounts, commissions, or requests for payment to unrelated parties or bank accounts should be treated as potential warning signs and escalated before proceeding.

11. Resellers, Distributors, Agents, Consultants, and Other Third Parties

Inflectra may be responsible for improper payments made by third parties acting on its behalf. Employees must therefore exercise appropriate care when selecting and managing third parties.

Depending upon the circumstances and level of risk, Inflectra may conduct reasonable due diligence before appointing an agent, reseller, distributor, consultant, or other intermediary.

Relevant considerations may include:

- the third party's ownership and management;
- reputation and experience;
- relationship with government officials or customers;
- business justification for the relationship;
- reasonableness of proposed compensation;
- country and industry risk;
- ability to perform the contracted services; and
- willingness to comply with applicable anti-corruption requirements.

Contracts with appropriate third parties should include suitable compliance provisions where warranted.

Inflectra personnel must not use a third party to perform an action that they could not lawfully or ethically perform themselves.

12. Anti-Corruption Red Flags

Employees must remain alert to circumstances that may indicate corruption or improper conduct.

Potential warning signs include a third party that:

- requests payment in cash;
- asks for payment to a personal bank account;
- requests payment in a country unrelated to the transaction;
- requests that payment be made to an unrelated third party;
- refuses to provide invoices or adequate documentation;
- requests an unusually high commission or discount;
- describes payments vaguely as "special fees," "handling fees," or similar terms;
- claims to have a "special relationship" with a government official or procurement decision-maker;
- requests payments immediately before a contract or government approval is awarded;
- refuses to disclose ownership information;
- requests that its involvement be concealed;
- requests that inaccurate information be placed on an invoice or contract;
- refuses to agree to reasonable anti-corruption obligations; or
- states that a questionable payment is necessary because "that is how business is done here."

The existence of a red flag does not necessarily mean misconduct has occurred. It does mean that the situation should be investigated and resolved before the transaction proceeds.

13. Charitable Donations and Sponsorships

Inflectra supports legitimate charitable and community activities. Charitable donations and sponsorships must not, however, be used as a means of providing an improper benefit to a customer, government official, business partner, or other individual.

Before making a donation or sponsorship connected to a customer, government official, tender, or prospective transaction, employees should ensure that:

- the recipient is a legitimate organization;
- the contribution serves a genuine charitable, educational, community, or commercial sponsorship purpose;
- the contribution is appropriately documented;
- no individual receives an inappropriate personal benefit; and
- the contribution is not intended to influence a business or governmental decision improperly.

14. Political Contributions

Inflectra funds, resources, or assets may not be used to make political contributions on behalf of the Company unless specifically authorized by senior management and permitted by applicable law.

Employees remain free to participate personally in lawful political activities in their individual capacity, provided that they do not represent such activities or contributions as being made on behalf of Inflectra unless expressly authorized.

15. Procurement and Competitive Bidding

Employees involved in public- or private-sector procurement processes must act with particular care. Inflectra prohibits attempts to obtain confidential tender information improperly, influence procurement officials through gifts or personal benefits, manipulate bidding requirements improperly, or provide undisclosed benefits to anyone responsible for selecting a supplier.

All information submitted in connection with tenders, requests for proposals, government contracts, and procurement processes must be accurate to the best of Inflectra's knowledge.

16. Books, Records, and Internal Controls

Inflectra requires accurate and transparent financial and business records.

All transactions must be recorded accurately and with sufficient detail to reflect their true purpose.

No employee or representative may:

- create false or misleading records;
- submit false expense reports;
- mischaracterize payments;
- create undisclosed or unrecorded funds;
- use false invoices;
- disguise the identity of a recipient;

- inaccurately describe commissions, gifts, marketing payments, or consulting fees; or
- intentionally circumvent applicable financial controls.

Employees are responsible for providing complete and accurate supporting documentation for company expenditures.

17. Conflicts of Interest

Personal relationships or financial interests can increase corruption risks.

Employees must disclose potential conflicts of interest involving customers, suppliers, partners, government officials, or other organizations with which Inflectra conducts business in accordance with applicable Company procedures.

Employees should not participate in decisions where an undisclosed personal or financial interest could improperly influence their judgment.

18. Reporting Concerns

Employees and other persons acting on behalf of Inflectra are expected to report suspected violations of this Policy, applicable anti-corruption laws, or other potentially improper conduct.

Concerns may be reported to:

- the employee's manager;
- Inflectra senior management;
- Human Resources, where applicable; or
- another reporting channel designated by Inflectra.

Reports should include as much factual information as reasonably available. Employees should not conduct their own investigation where doing so could compromise evidence or interfere with an appropriate Company review.

Inflectra will treat reports sensitively and, where practical and appropriate, confidentially.

19. No Retaliation

Inflectra prohibits retaliation against any person who, in good faith:

- reports suspected bribery, corruption, or misconduct;
- raises a compliance concern;
- seeks advice concerning this Policy;
- refuses to participate in conduct they reasonably believe may violate this Policy; or
- participates in an internal or external investigation.

Knowingly making a false accusation or intentionally providing false information is not protected by this provision.

20. Responding to Suspected Violations

Inflectra will review credible allegations of bribery, corruption, or violations of this Policy and may conduct an investigation appropriate to the circumstances.

Employees and contractors are expected to cooperate honestly with authorized investigations.

Where appropriate, Inflectra may take corrective measures including improved controls, training, disciplinary action, termination of a business relationship, recovery of funds, or referral of a matter to appropriate authorities.

21. Violations

Violations of anti-corruption laws can result in serious consequences for Inflectra and the individuals involved, including criminal or civil penalties, loss of business, reputational harm, and restrictions on conducting business.
Violations of this Policy may result in disciplinary action, up to and including termination of employment or contractual relationships, subject to applicable law.
No employee will be penalized for refusing to pay a bribe, even if that refusal results in Inflectra losing a business opportunity.

22. Training and Awareness

Inflectra may provide anti-corruption training to personnel based upon their responsibilities and level of risk.
Employees involved in international sales, government customers, procurement, finance, partnerships, channel management, and other higher-risk activities may receive additional guidance or training.
Relevant employees are expected to understand this Policy and seek guidance whenever they are uncertain about whether proposed conduct is appropriate.

23. Responsibilities

Every employee and representative of Inflectra has responsibility for complying with this Policy.
Managers have additional responsibility for promoting an ethical culture, responding appropriately to concerns raised by employees, and escalating suspected violations.
Senior management is responsible for maintaining appropriate oversight of Inflectra's anti-corruption compliance framework and reviewing this Policy periodically.

24. Questions and Guidance

Anti-corruption situations are not always straightforward. Employees should seek guidance before acting whenever they have concerns regarding a payment, gift, commission, discount, customer request, partner arrangement, government interaction, or other transaction.
A useful principle is:
If a payment, benefit, or arrangement would be uncomfortable to describe openly to Inflectra management, an auditor, a customer, or a regulator, do not proceed until appropriate guidance has been obtained.
Questions regarding this Policy should be directed to a member of the Inflectra Leadership Team.

25. Policy Review

Inflectra will periodically review this Policy and its related procedures to reflect changes in the Company's operations, applicable laws, and identified compliance risks.