



Legal Center - Privacy, Security, & Terms of Use for Software Current Websites

Compliance Concerns and Reporting

Software Current is committed to operating with integrity and in full compliance with laws, regulations and policies. Our foundational values of **honesty, integrity, and respect for people** are essential guides to the way we act internally among our team of employees, investors, contributors and suppliers, and externally with our stakeholders, who include our clients, audience and professional community. For us, that means we are truthful and sincere, we act consistent with moral and ethical principles, and we value each person's unique capabilities and qualities, with open-minded consideration for their rights, feelings, and traditions.

These values along with our core value of **accountability** reflect our commitment to a strong compliance culture as a non-negotiable foundation of how we do business. More than words on paper, our values are actionable and we are prepared to do what is necessary to ensure that EBM is managed in line with our commitment. You can help us achieve this goal.

The Ethics and Compliance Hotline is a dedicated channel for anonymous and confidential communication that facilitates reporting of possible illegal, unethical or improper conduct when the normal channels of communication have proven ineffective or impractical under the circumstances. A toll-free Compliance Hotline or Confidential Email is available for reporting any ethical or compliance concerns.

The Hotline is available to EBM employees, as well as clients, contractors, vendors and other stakeholders in a business relationship with EBM. If you are unsure about where to go with your concerns, or you feel uncomfortable reporting through normal channels of communication, or wish to raise the issue anonymously, you should access the Ethics and Compliance Hotline.

All reports to the Compliance Hotline are investigated and handled in a confidential manner by trained individuals. Callers may remain anonymous or leave their contact information if they so choose. EBM relies on this reporting information to confirm or improve its processes and practices. EBM prohibits retaliation against anyone who, in good faith, reports a possible

violation or who participates in an investigation, even if sufficient evidence is not found to substantiate the concern, EBM will take appropriate action against any individual determined to be engaging in retaliatory conduct.

IMPORTANT: If your message is not related to compliance, please contact our Consumer Services team. www.softwarecurrent.com/contact

How to report a compliance concern?

EBM Ethics and Compliance Hotline is available any time (24/7, 365 days a year)

- You can choose to call a toll-free phone number, +1 601-879-4436, and leave a message (anonymously or confidentially) or send a confidential email to legal@softwarecurrent.com.
- We take all concerns seriously and will take the appropriate action on each report. We will keep you informed on our progress while processing your concern.
- We are committed to improving our Ethics and Compliance Hotline and compliance reporting system and reserve the right to make changes in the future.

What happens after I have sent my report?

1. Acknowledgement

If you provide confidential contact information, we will acknowledge receipt of your report within five (5) working days. It may take longer if your report is sent during a public holiday. If your initial report does not include enough evidence, we will get in touch to ask you to provide more evidence.

2. Triage and Escalation

Each report we receive is studied carefully. We will open a case if your report is credible and includes enough evidence. The investigation will be led by our legal department. Reports that contain serious allegations will be escalated to our Chief Legal Officer. Chief Legal Officer will be informed when a report involves allegations of:

- dishonesty, criminal activity, antitrust /competition law, or issues involving revenue recognition, corruption, bribery or significant fraud
- misconduct by members of a Software Current senior leadership member
- matters that are likely to negatively affect the reputation or public image of Software Current.

3. Confidential investigation

The investigation will be handled with consistency and confidentiality – we will only involve people who need to be involved. Our compliance team may conduct confidential interviews with employees, contractors or anybody they feel is relevant to the investigation.

4. Decision and reply to you

After reviewing all the findings of our investigation, we will decide if a breach has taken place, and, if that is the case, take action. If you have provided contact information, you will be informed accordingly.

IMPORTANT NOTICE

Non-retaliation commitment: Software Current prohibits retaliation of any type against an employee who brought forward a concern in good faith. Anyone who attempts to retaliate against an employee for reporting in good faith may face disciplinary action, including the possibility of dismissal. Software Current also protects the rights of the person accused.

What is appropriate to report to our Ethics and Compliance Hotline?

In order to facilitate actionable and effective investigations, please include a detailed description of the incident (who, what, when, how) and supporting evidence (e.g. copies of documents, screenshots, or names of witnesses) that can corroborate your report. Please note that general assertions cannot be investigated.

Appropriate reasons to contact our Ethics and Compliance Hotline include:

- Suspected violations of our Company values, policies, or procedures
- Questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information
- Suspected violations of law or fraudulent activities other than Fraudulent Auditing and Accounting Activities
- To receive interpretative guidance on provisions of the company's policies, procedures or code of ethics
- To report quality control or workplace safety concerns