



Rackspace Technology Partner Code of Conduct

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Document Owner: Legal

Purpose:

This Partner Code of Conduct (“Code”) applies globally to all Rackspace Technology (“Rackspace”) suppliers, vendors, and partners, including their employees, independent contractors, and agents (“Partners”). Rackspace expects Partners to comply not only with all applicable laws, but also with this Code and the Rackspace policies defined herein. It sets out Rackspace’s expectations around the development of a diverse and sustainable supply chain, human rights, business ethics, the environment, and health and safety. It also describes the reporting requirements for all Rackspace officers, employees, and agents regarding any conduct that does not meet these expectations.

Affected Parties:

This standard is a global standard that applies to all Rackspace business entities, divisions, departments, directors, employees and contractors. Likewise, it addresses all global partners, vendors, or suppliers of Rackspace. These requirements equally apply to all workers, including but not limited to, permanent, temporary, agency, piece rate, salaried, hourly, legal young workers (minors), part time, night shift and migrant workers.

Policy Statement:

Human Rights

It is important that Rackspace Partners share the Company’s commitment to bolster and protect human rights by treating all people with respect and dignity while adhering to all human rights and labor laws. At a minimum, Partners must comply with all applicable employment laws and regulations, including, but not limited to, those laws that relate to discrimination, harassment, working time, overtime, minimum wage, and workplace safety.

In addition, Rackspace published its statement in response to global modern slavery laws to remain transparent on standards and core business practices that ensure human rights are held to the highest standard. Rackspace is committed to only doing business with those that share those same ethical standards. Read the statement [here](#).

Partners are strongly encouraged to educate their workers on their rights and have appropriate and effective grievance mechanisms in place.

- Non-discrimination. Everyone must receive equal treatment in all aspects of employment. Partners will not discriminate in employment (including but not limited to hiring, compensation, promotion, discipline, termination or retirement) on the basis of sex, race, religion, age, disability,

sexual orientation, pregnancy, marital status, socio-economic status, nationality, political opinion, trade-union affiliation, social or ethnic origin or any other status protected by applicable law. Local laws and certain contracts may require Partners to, or may allow Partners to, protect or give priority to a particular category of people when making certain hiring and employment decisions.

- Voluntary Employment. All work performed for Partners must be voluntary. Workers must be free to leave or terminate employment at any time, at their own will, and without penalty, including but not limited to coercion such as withholding monetary payments, passports or other identity documents. Workers must be able to freely access basic liberties including clean toilet facilities and potable drinking water. Forced, bonded or indentured labor, involuntary, prison labor, slavery or trafficking of persons will not be tolerated.
- Terms of Employment. Where required, employees should receive an employment contract that sets out their terms and conditions in accordance with the relevant local laws. Employment and termination of employment must be carried out in a fair manner.
- Child Labor. Partners must not employ any person under the relevant minimum age for employment as defined by applicable law or the completion of compulsory education, whichever is greater. Partners may operate internship, workplace apprenticeship, and work experience programs that comply with all applicable laws.
- Work Hours. Partners must not require workers to work more than the regular and overtime permitted by the country where the worker is employed. All overtime work must be consensual; must be compensated at an agreed rate; and must not be requested by the employer on a regular basis.
- Wages and Benefits. Partners must pay at least the minimum wage (or the appropriate prevailing wage), whichever is higher and comply with all legal requirements on wages and benefits required by law or contract. Workers shall not be required to pay recruitment fees or other fees for employment. If Partners provide residential accommodation for workers then these must be habitable, clean and safe.
- Harassment or Abuse. Every worker must be treated with respect and dignity. No worker must be the subject of harassment or abuse of any type (physical, sexual, psychological or verbal.)
- Freedom of Association. Partners must recognize and respect the right of workers to freedom of association and collective bargaining. Employees have the right to join or form a trade union without facing discrimination or intimidation. Where freedom of association and collective bargaining is restricted by law, employees should have the right to develop analogous means.

Rackspace expects its Partners to provide a safe and healthy working environment to prevent accidents and injury linked with, arising out of, in the course of work or as a result of the operation of Partner facilities. Partners will take a proactive approach to health and safety.

- Legal Compliance. Partners should ensure all business operations are carried out in compliance with all applicable health, safety and environmental legislation and regulations within the countries and industries they operate.

- Information, Instruction, Training and Supervision. Effective training programs addressing workplace hazards and safety procedures are to be implemented and made mandatory for workers.
- Emergency Preparedness. Partners should establish a process for identifying potential occupational health and safety hazards/risks (including any environmental hazards) within the workplace. Procedures for emergency preparedness should be implemented to mitigate such hazards, including but not limited to, fire alarms, fire drills, clearly marked emergency exits and fire extinguishers.
- Incident Reporting and Management. Partners should have a procedure in place within their management system to measure and regularly assess the effectiveness of their current policies and procedures regarding health, safety and environmental obligations.

Ethics & Governance

Partners should understand that although this Code covers a wide range of business practices, it is not all inclusive. Partners must conduct themselves according to the following principles and seek to avoid even the appearance of improper or inappropriate behavior by exercising good judgment in all areas of business.

- Conflicts of Interest. Partners and their workers should avoid conflicts of interest. A "conflict of interest" exists when a person's private interest interferes in any way, or even appears to interfere, with the interests of the company. Partners must provide prompt notification to all affected parties in the event an actual or potential conflict of interest arises.
- Anti-Corruption and Anti-Bribery. Partners and their workers or agents must not give, receive, offer or solicit bribes of any kind or to use their position, power or authority to obtain or gift improper benefit or advantage. This includes allowing others to offer or accept bribes on behalf of a Partner. Full compliance with international laws in these areas must be adhered to.
- Gifts, Entertainment and Hospitality. Rackspace will accept only small token gifts or what is deemed to be reasonable and proportionate entertainment or hospitality and will not allow gifts, entertainment or hospitality to influence a business decision or lead to an unfair business decision or advantage. Partners must align these principles in their business dealings with Rackspace and their subcontractors or any other representative related to business activities by, for or on behalf of Rackspace. Specifically, Partners are prohibited from receiving, offering, promising, authorizing, directing, or making any bribes, kickbacks or payments of money or anything of value to improperly obtain business or any other advantage for Rackspace.
- Government Contracting. Partners must strictly observe the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity and the performance of government contracts.
- International Trade Laws and Export Regulations. Rackspace conducts its global business in strict compliance with applicable international trade laws and expects its partners to do the same. Furthermore, as a U.S. company, Rackspace requires all Partners to comply with applicable laws and regulations on boycotts and export controls. United States export control laws govern all exports, re-exports, and use of U.S.-origin products, services, and technical data wherever

located. Rackspace requires that Partners fully comply with applicable foreign and multilateral export laws.

- Respecting Privacy. Partners must comply with all applicable privacy laws, information security laws and regulatory requirements where personal information of any kind is collected, shared or stored. Rackspace business partners must secure personal information, in accordance with the Rackspace standards, against unauthorized access and not use or reuse this information for any other purpose without first obtaining the appropriate permissions.
- Tax Evasion. Partners must comply with all applicable tax laws and establish procedures to prevent the facilitation of tax evasion.
- Fair Competition and Antitrust. Rackspace requires its Partners to abide by all applicable fair competition, deceptive practices, and antitrust laws.
- Anti-money Laundering and Counter-terrorist Financing. Partners must comply with all anti-money laundering and counter-terrorist financing laws wherever they do business. Furthermore, Partners must not engage in or assist any third parties with these activities.
- Insider Trading. Rackspace Partners and their personnel must not use material, non-public information obtained in the course of their business relationship with Rackspace as the basis for trading or for enabling others to trade in the securities of Rackspace or any other company.
- Intellectual Property. Partners must respect the intellectual property rights of Rackspace and others, including relevant internal processes, information and technology. Rackspace requires Partners to take the necessary precautions to safeguard their knowledge.
- Confidentiality. Partners must safeguard confidential information by not transferring, publishing, using, or disclosing it except as in accordance with applicable regulations, contractual requirements, or this Partner Code of Conduct. Confidential or personal information or information that is protected by privacy standards should be safeguarded, shared internally only with those employees with a need to know, and not misused or disclosed to unauthorized third parties.
- Ethics and Compliance. Rackspace Partners must maintain a system to support compliance with applicable laws, regulations and the expectations outlined in this Partner Code of Conduct commensurate with their size and business operations.

Environmental Sustainability

Partners are encouraged to incorporate environmental responsibility into their operational decision-making processes, to perform above the minimum standard of the law and continually revisit their sustainability performance to ensure efforts are being made to improve results.

- Stewardship. We value companies who measure and manage their resource use and demonstrate stewardship in minimizing their impact to humans and the planet. Partners should familiarize themselves with Rackspace's Global Energy Policy.
- Responsible Sourcing. Partners are expected take a holistic view and consider social, environmental and governance aspects of decisions on upstream and downstream Partners, materials and services.

- Environmental Management System for Partner Operations. Partners must take a proactive and progressive approach to minimize negative impacts to the environment. Partners should have environmental policies and standards and must comply with all environmental laws and regulations. Factories must continuously monitor their production process including those related to emissions, discharges and disposal of waste.
- Hazardous Waste. Partners must manage all hazardous materials capable of posing a threat to health and safety by ensuring all materials are safely and appropriately handled and disposed. Partners should ensure that all personnel are trained on how to handle hazardous material.
- Wastewater and Solid Waste Emissions. Partners must monitor, treat, control, and manage wastewater and solid waste and dispose of it properly.
- Air Emissions and Pollution Prevention. Partners must ensure air emissions are properly disposed of upon release. To promote a sustainable environment, Partners should strive to reduce their resource consumption and use and implement improvement plans for waste reduction, recycling and energy conservation policies.
- Conflict Minerals. Rackspace Partners must not use “conflict minerals” as defined by relevant law. Furthermore, all applicable Partners must meet the conflict mineral reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.
- Designed for Sustainability. Partners must take steps to consider all impacts of goods and services used and produced throughout the product/service lifecycle (design, sourcing, manufacturing, shipment, operation re-use, recycling and disposal). Rackspace views these efforts as essential to further the human experience, strengthen communities of operation and minimize impact on the planet.

Assessment and Management

Rackspace expects Partners to have effective management systems implemented in all areas of operation to ensure compliance with the standards laid out in any agreement between the parties and this Partner Code of Conduct. Partners must continuously assess their operations against this standard using high quality and industry current processes and management tools.

Anytime Partner engages a subcontractor, it will confirm that the subcontractor meets all expectations outlined in any agreement between the parties and this Partner Code of Conduct. Partners and their subcontractors must have adequate processes for the creation and maintenance of documents and records designed to ensure compliance and conformity to this standard and as required by law. This includes appropriate controls to ensure confidentiality and to protect privacy. Partner shall attain the right to audit their subcontractor operations consistent with any agreement between the parties and this Partner Code of Conduct to ensure compliance. Partner will make records of these audits available to Rackspace upon request. Partner shall further have written agreements in place with subcontractors to ensure that any further subcontracting by the subcontractor is authorized and meets the requirements set out in this standard.

Review and Maintenance:

This document should be reviewed annually. Revisions, waivers, or exceptions must be approved by a Director+ employee within the Supply Chain Operations or Legal team.

Enforcement:

Partners are responsible for the conduct of their subcontractors and are expected to take appropriate steps to bring subcontractors into compliance with this Partner Code of Conduct.

This standard is not intended to replace, revise or override any existing contractual requirements between a Partner and Rackspace. If a contract between a Partner and Rackspace includes stricter or more specific requirements than this Code, then we expect Partners to also adhere to those stricter or more specific requirements. Partners should know and understand that failure to comply with the standards stated in this standard will be considered a breach of contract and may lead to suspension or termination of the relationship.

At a minimum, Rackspace Partners must comply with all the laws applicable to its business operations in each country in which it operates, both in letter and in spirit.

Partners shall self-monitor and demonstrate their compliance with this Partner Code of Conduct, notifying Rackspace promptly of any non-compliance. Partners must promptly cooperate with Rackspace's requests for information related to compliance with the law, this Partner Code of Conduct and/or any existing contract. Rackspace (together with Rackspace customers or partners, where legally required as third-party beneficiaries, upon Rackspace approval) may also audit the Partner or their subcontractors at any time to ensure compliance with the law, this Partner Code of Conduct and/or any existing contract. This may include an on-site audit as Rackspace deems appropriate. Denial of permission to conduct an audit will be considered a breach of contract and may lead to suspension or termination of the relationship.

Ongoing, independent monitoring of corporate supply chains is essential. Partners are encouraged to provide and offer accessible and confidential means for workers to report suspected violations that is free from undue influence or retribution, as well as an independent audit mechanism to investigate and remediate issues.

If any person wishes to report a suspected violation of this Code, they may do so by either phone or web at: speakuprackspace.com. Rackspace encourages individuals to report any questions or concerns and does not tolerate any retaliation taken against an individual who, in good faith, has reported a suspected violation of this Partner Code of Conduct.

Approval:



Brenna Nava
VP & Deputy General Counsel

July 2022

Date