



Infor Code of Ethics and Conduct

A Message from Leadership

Dear Fellow Employee:

The remarkable success of Koch and its employees has always been rooted in proven principles of human progress. The better we have understood and applied these principles, the more we have prospered by benefitting others. This has been true for nearly 60 years and our future success depends on continuing to improve our ability to do so through the application of our framework – Principle Based Management™.

The Infor Code of Ethics and Conduct is an important way for us to communicate these principles to you and to our partners, and to help you make decisions that are consistent with laws, regulations, internal standards and our principles. As such, the Code is here to provide you with guidance and insight as you work through situations in your role. The Code also provides guidance on when and how to elevate questions and concerns.

We expect every employee, regardless of role or experience, to live by Our Values and apply Principle Based Management. Whether you have been with Koch for days or decades, learning and improving your personal application of Principle Based Management is your responsibility. Reading, understanding and acting in harmony with the Code of Ethics and Conduct is a key part of supporting our culture and an expectation for everyone at Koch, regardless of their title or position.

We encourage you to talk with your supervisor about any questions or concerns you may have about the Code of Ethics and Conduct and how it applies to you and your role. Remember - stop, think and ask.



Charles Koch



Dave Reister



[Signature]

OUR VALUES

Of all the proven principles of human progress, these eight are the foundational values of our culture and thus are among the most important for all of us to exemplify daily. They are an essential aspect of our Virtue and Talents dimension. They define who we are as an organization and are necessary for the long-term success of Koch and each of us.

1 Integrity Have the courage to always act with integrity.

2 Stewardship & Compliance Act with proper regard for the rights of others, especially regarding safety and the environment. Comply with all laws and regulations. Stop, think and ask.

3 Principled Entrepreneurship™ Create virtuous cycles of mutual benefit by becoming a preferred partner of customers, employees, suppliers, communities and other core constituencies. Continually seek to identify and close the gaps between what you are and what you could be accomplishing if you were fully applying Principle Based Management™.

4 Transformation Transform yourself and help the company and others to do the same. Develop the visions, strategies, capabilities, products and services that will enable us to satisfy unmet needs and create superior value.

5 Knowledge Seek and acquire the best knowledge from any and all sources that will enable you to innovate and improve results. Share your knowledge proactively. Provide and solicit challenge consistently and respectfully.

6 Humility Be humble, intellectually honest and deal with reality constructively. Develop an accurate sense of self-worth based on your strengths, limitations and contributions. Hold yourself and others accountable to these standards.

7 Respect Treat everyone with honesty, dignity, respect and sensitivity. Include and embrace different perspectives, experiences, aptitudes, knowledge and skills in order to leverage the power of diversity.

8 Self-Actualize Be all you can be. Identify, develop and apply your gifts and passions so you can best contribute in ways that are most meaningful to you. Be a lifelong learner.

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Social Stewardship at Infor

We Believe In The Power Of Our People.

At Infor, we believe in the power of everyone. We know that the best ideas come from diverse and inclusive teams, which empowers us to meet the changing needs of our global employees, customers, and communities. Our social stewardship framework highlights our deep appreciation for the dignity of each individual and respect for their rights – as well as our bottom-up approach to helping people improve their lives.



Community Outreach and Philanthropy

We are committed to addressing the challenges of tomorrow through impactful programs and partnerships. By investing where we operate, we can create stronger communities and change lives for the better.



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INTRODUCTION

Our code governs all of our business-related decisions and actions, whether in the boardroom, in our offices, working remotely or out in the field with our customers.

Purpose of our code

The Infor Global Code of Ethics and Conduct is designed to help you navigate ethical dilemmas and business conduct issues that you may encounter in the course of your work for Infor. While no single policy could address every potential scenario, the list of topics our code covers includes those that are most relevant to a growing company like ours with operations across the globe. Our code is also here to remind you of when and how to raise a concern or ask a business conduct or ethics-related question if you ever find yourself in need of some additional guidance.

All Infor employees, officers, and directors (collectively “Infor representatives”) must read and adhere to our code. From time to time, we may also share our code with non-employees, contractors, suppliers, service providers and third-party intermediaries so that they better understand the principles that drive our business and our ethical standards.

Responsibility of managers & supervisors

The culture of an organization influences our actions. Managers, supervisors and leaders have a particular responsibility to ensure that our values as a company and the principles outlined in our code are embraced and followed. Preserving the right culture takes more than just telling employees to follow the rules, it requires leading by example.

Ultimately, each one of us is individually responsible for acting ethically and being a steward of Infor’s brand and reputation.

How & where to seek guidance

If you have questions about our code or are ever unsure of the right course of action in a situation, it is always best to reach out to someone else in the company who can help you think through your approach.

Your manager, or any member of management, Ethics & Compliance, Human Resources, and the Legal Department are all available to answer your ethics and business conduct-related questions and to assist with interpreting our code. With limited exceptions based on local legal requirements, you also have the option of seeking guidance anonymously through [Infor’s Ethics and Compliance Hotline](#).

Infor representatives who observe, learn of, or, in good faith, suspect a violation of this code or other wrongdoing that affects Infor have an obligation to speak up and report the concern as soon as possible. Various methods of reporting are available, as listed at the end of our code.

Anti-retaliation policy

Retaliation, retribution, or harassment against any employee who, in good faith, asks any questions or raises any concern regarding ethical behavior or compliance responsibilities is against company policy and is prohibited. “Good faith”: does not mean that a reported concern must be correct, but it does require that you believe you are providing complete and truthful information when you report a concern or ask a question.

Any alleged act of retaliation must be reported immediately to the Global Lead, Ethics and Compliance and the Legal Department. If determined to have in fact occurred, any act of retaliation will result in appropriate disciplinary action, which may—subject to local legal requirements— include termination of the Infor representative.

Any Infor representative confronted with a situation that he or she believes may violate or lead to a violation of our code or the laws or regulations governing our business should follow the compliance procedures described in the section entitled “Reporting of violations” below without fear of reprisal.

Our code’s relationship to other Infor policies

Our code should be read in conjunction with Infor’s other related policy documents. Our code supplements, but does not supersede, any contractual obligation any person may have under the terms of any agreements with Infor.

Our code is not intended to create any employment or agency relationship, or contract (express or implied) with any person, including, without limitation, any employment or consulting contract, or to constitute any promise that a person’s employment or consulting arrangement will not be terminated except for cause.





WORKPLACE CONDUCT

Maintaining a safe, healthy, and inclusive workplace is a priority for Infor.

Discrimination

The diversity of Infor representatives is a tremendous asset. Infor is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate unlawful discrimination of any kind. Examples of conduct that will not be tolerated include discrimination based on race, color, religion, creed, national origin, place of birth, citizenship, ethnicity ancestry, sex, gender, transgender status, gender identity and gender expression, sexual orientation, age, physical or mental disability or condition, genetic information, veteran or military status, marital status, family and medical leave status, pregnancy, childbirth and related conditions (including, without limitation, lactation or the need to express breastmilk for a nursing child) or any other legally protected category.

Harassment

Infor is committed to providing a work environment free of unlawful harassment. Infor policy prohibits harassment based on color, race, religion, gender or gender identity, sexual orientation, national origin, citizenship, ethnicity, age, disability, pregnancy, veteran status, genetic information, or other legally protected factors. Harassment includes any verbal or other conduct that may be received as offensive, bullying, intimidating or disparaging to any individual group, employee, applicant, vendors, customers, or contractors. Conduct that could be considered unlawful harassment includes but is not limited to: slurs; derogatory and/or sexually-oriented jokes, comments or displays; discussion or inquiries about one's own or someone else's sexual

activities; unwelcome sexual advances, propositions, flirtations, invitations, or comments; physical conduct including assault, unwelcome touching, gestures, intentional blocking of normal movement or interfering with work, or other conduct directed toward a person due to their gender, race, or any other protected status; and threats and demands to submit to sexual requests as a condition of continued employment, advancement or to avoid some other loss, and offers of employment benefits in return for sexual favors.

Every employee is required to abide by our policy against unlawful discrimination and prohibited harassment and to bring to the company's attention any action that does not comply with that policy or our commitment to equal employment opportunity. Supervisors and managers must be watchful for any signs that our policy is not being followed and must report any possible violations even if there has been no complaint. The company will investigate and respond to all reports of unlawful discrimination or prohibited harassment.

If you believe you have been subjected to discriminatory or harassing behavior, you observe such conduct, have knowledge or someone confides in you that he or she believes they have been subjected to such behavior, you must contact any of the following: your immediate supervisor, any member of management, any local or corporate human resources leader, any ethics and compliance resource, any lawyer in Legal or the GuideLine. Retaliation against anyone for reporting unlawful discrimination or prohibited harassment in good faith is against company policy and is prohibited.

Health, safety & the environment

Infor strives to provide each Infor representative with a safe and healthy work environment.

Each of us has responsibility for maintaining a safe and healthy workplace for all Infor representatives by following safety and health rules and practices and promptly reporting accidents, injuries and unsafe equipment, practices or conditions.

It is also Infor policy to comply with both the letter and spirit of all applicable environmental laws and regulations.

Substance abuse

Infor representatives should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The possession or use of illegal drugs or abuse of legally prescribed drugs in the workplace is strictly prohibited.

Bullying & work place violence

Infor has a zero-tolerance policy with regard to bullying and workplace violence. Infor representatives are prohibited from engaging in any conduct intended to cause another individual to feel threatened or otherwise unsafe. Physical violence, verbal assaults, intimidation, cyberbullying, or other hostile acts have no place at Infor.

Infor prohibits the unauthorized possession and/or use of weapons by any Infor representative while at work, on company property, or while on company business.

Q

“I overheard one of my colleagues making inappropriate statements about the way another colleague dressed for a client meeting. Some of the things I heard struck me as really offensive, but I worry that maybe I’m just being sensitive, what should I do?”

A

Every Infor representative should strive to ensure that our workplace is one in which everyone feels respected and comfortable. Chances are if something you see or hear makes you uncomfortable, it has the potential to do the same for your colleagues. In this instance, if you feel comfortable addressing your concerns directly with your colleague who made the comment, you should. If you don't feel comfortable doing that, you should absolutely share your concerns with your manager, HR, or Compliance & Ethics.

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BUSINESS CONDUCT

Infor seeks to conduct its business fairly, in good faith, with integrity, and in compliance with the letter and the spirit of the law.

Compliance with laws

Given Infor's global footprint, the company is subject to a variety of laws and regulations, many of which are complex and constantly evolving. Infor is also subject to and committed to complying with a number of financial and environmental regulations.

Infor's approach is simple: the company will comply with all applicable laws and regulations.

No Infor representative may violate or direct any other individual or entity to violate any law or regulation on behalf of Infor. Violations of laws may result in criminal or civil liability for the company and for individuals. Such violations or even suspected violations may also subject Infor to serious reputational or financial harm. Any unlawful conduct will automatically be deemed a violation of our code.

If you have questions concerning a specific circumstance or you find yourself in a situation in which you believe a local law or regulation is in conflict with our code, you should contact Ethics & Compliance & or the Legal Department before taking any action.

Conflicts of interest

A conflict of interest can arise when your personal interests, activities, or obligations—financial, familial, professional, political or otherwise—overlap with your work responsibilities. This can compromise or appear to compromise your ability to make or participate in business decisions and actions based on the best interests of Infor.

Our code requires Infor representatives to seek to avoid conflicts of interest, or even the appearance of a conflict of interest. If you believe you have a potential conflict of interest you should disclose it immediately to Ethics & Compliance or the Legal Department so that it can be properly addressed. Failure to disclose a potential conflict of interest is a violation of our code.

Examples of some common scenarios that could give rise to a conflict of interest include:

Employment and other activities

Infor representatives may not engage in any outside activity that encroaches on the time and attention required for their duties at Infor. Before taking a second job with any other company, you should talk with your supervisor or follow your jurisdictional reporting mechanism to make sure it does not pose a conflict for you or is not prohibited by local law. In addition, Infor representatives may not imply Infor's sponsorship or support of any outside activity that is not official Infor business, and under no circumstances are Infor representatives permitted to take for themselves or their family members business opportunities that are discovered or made available by virtue of their work at Infor.

Infor representatives may not perform services for or have a financial interest in any entity that is, or to their knowledge may become, a vendor, client or competitor of Infor unless such services are pre-approved in writing by the Global Lead, Ethics and Compliance. Infor representatives are also prohibited from taking part in any outside employment or directorships without the prior written approval of the Ethics and Compliance Global Lead.

No Infor representatives may acquire securities of a customer, supplier, competitor or other party if ownership of the securities would be likely to affect adversely either the employee's ability to exercise independent professional judgment on behalf of Infor or the quality of the representative's work. Hiring, evaluation, advancement, and business decisions must be made based on the business interests of Infor and must be free from conflicts of interest, or other improper factors.

Civic, charitable and political activities

Infor sponsors a number of civic and charitable activities but Infor representatives are also encouraged to participate in civic, charitable and political activities of their own choosing so long as their participation does not encroach on the time and attention required for their duties at Infor. Such non-Infor sponsored activities are to be conducted in a manner that does not imply or otherwise create an appearance of Infor's involvement or endorsement.

Inventions, books and publications

Infor representatives must receive written permission from the Chief Executive Officer, Ethics and Compliance Global Lead and the General Counsel before developing or advising on, outside of Infor, any products, software, intellectual property, or services that may be related to Infor's current or potential business.

Q

“My brother-in-law is joining an existing Infor vendor whose contract with Infor is up for renewal. As luck would have it, he'll be taking over the Infor account and thinks he can offer the company additional discounts. I've used this vendor for years and have had nothing but positive experiences with it. There's no conflict of interest here because I would have renewed the vendor's contract in any case and I'm probably going to secure an additional discount. Right?”

A

Not necessarily. While your decision to renew Infor's contract with this vendor may in fact be independent of your brother-in-law's new position and it's great that you may be able to secure an additional discount, it is possible that this sort of situation may appear from the outside to present a conflict of interest so it must be disclosed and cleared by the Ethics and Compliance Global Lead. Even the appearance of a conflict of interest could create issues for Infor so it's always best to err on the side of disclosing. Most conflicts of interest, if properly disclosed, can be cleared with proper safeguards.

Prohibition on corruption, bribery & other improper payments

Infor has a zero-tolerance policy with regard to corruption and bribery.

No Infor representative may, directly or indirectly, give, offer, promise or authorize the provision of a bribe or improper payment to anyone. A bribe can be anything of value – money, gifts, gratuities, rewards, meals, entertainment, favors, discounts, political and charitable contributions, offers of paid or unpaid employment, or any other advantage or benefit of any kind that the recipient may find valuable—intended to secure an improper advantage for Infor or to influence or reward the recipient for improperly carrying out their function or duty.

Infor representatives are also prohibited from directly or indirectly soliciting, demanding or accepting a bribe or improper payment from anyone. Moreover, Infor representatives are prohibited from using any third-party intermediary, such as an agent, contractor or family member, to offer, promise, pay, demand, solicit, or receive a bribe or other type of improper payment.

Any offer of or request for a bribe or improper payment must be reported immediately to the Ethics and Compliance Global Lead and Infor's General Counsel.

Facilitation or “grease” payments

Facilitation payments are usually small, unofficial payments to a government official to expedite or secure the performance of non-discretionary, routine government duties or functions, including:

- the issuance of a permit, license or other documents to qualify a person to do business;
- the processing of official documents, such as visas and work permits;
- the provision of services normally offered to the public, such as mail pick-up and delivery, telecommunication services and power and water supply; and
- the provision of services normally provided as required, such as police protection, loading and unloading of cargo, the protection of perishable products or commodities from deterioration or the scheduling of inspections related to contract performance or transit of goods.

Infor prohibits facilitation payments except in extremely limited circumstances, generally in response to an imminent threat to a person's physical health or safety. If you think you need to make such a payment, written approval must be sought from the Ethics and Compliance Global Lead.

If circumstances do not allow for pre-approval, the payment must be reported to the Ethics and Compliance Global Lead as soon as possible. Any such payments must be appropriately and accurately identified in the accounting records of Infor.

Q

“I’ve heard that an Infor partner is starting to get a reputation in the market for providing extravagant gifts and entertainment to potential customers, some of whom include government officials. Should I act on these rumors, even if they’re unconfirmed and they don’t relate directly to Infor?”

A

Absolutely. Infor’s prohibition on bribery and corruption is strictly enforced and it is in everyone’s best interest to escalate any information you come across about potential misconduct in this area, whether it relates to Infor or one of its business partners. To be sure, Infor is potentially liable for third parties, including partners, who engage in misconduct while acting on the company’s behalf or in the course of conducting Infor-related business.

Dealings with government entities, state-owned enterprises & public officials

Infor’s prohibition on bribery and corrupt conduct certainly applies to any interactions Infor representatives have with public officials. [Interactions with government entities and public officials are always sensitive and may require extra care](#) to ensure that there is not even the appearance of corruption or impropriety.

Government entities and State-Owned Enterprises include, without limitation:

- Government agencies or departments;
- Public hospitals or medical facilities;
- State-owned or controlled utilities and telecommunications companies;
- National oil and gas companies;
- Law enforcement and military organizations; and
- State banks and state-owned investment vehicles, e.g. sovereign wealth funds

Public officials include, without limitation:

- Political parties or officials thereof, political candidates and elected or appointed representatives;
- Any officer, employee, or person acting in an official capacity for or on behalf of any government (including any department or instrumentality thereof) or governmental agency holding a legislative, administrative or judicial position at any level;
- A person who performs public duties or functions, including a person employed by a board, commission, corporation or other body or authority that is established to perform a duty or function on behalf of the government, or is performing such a duty or function; and
- Any officer, employee, or person acting in an official capacity for or on behalf of a public international organization (such as the World Bank).

Gifts & business courtesies

Gifts and business courtesies are a normal part of building and maintaining business relationships. However, this activity must always be within the bounds of the law and must not give the appearance of impropriety.

Gifts and business courtesies for government entities, state-owned enterprises and public officials

Employees of government entities and state-owned enterprises generally have to adhere to very strict requirements when it comes to accepting gifts and business courtesies. These requirements are rarely published and change often. For that reason, [Infor's general policy is that the company will not provide gifts or extend business courtesies to any third party who is employed by a government entity or state-owned enterprise or otherwise meets the definition of a public official](#). Limited exceptions may apply subject to pre-approval by Infor's Ethics and Compliance Global Lead.

Gifts

Infor does not prohibit the giving or receiving of gifts of nominal or token value to or from non-government suppliers and customers, provided that they are for a legitimate business purpose for Infor and (1) are not for the purpose of obtaining or retaining business or some other improper advantage for Infor; (2) are otherwise lawful and, to your knowledge, not prohibited by the recipient's employer; (3) are given transparently and are appropriate in the circumstances, taking into account the type, value, and reason for the gift; and (4) would not be embarrassing to the business if its provision became public knowledge. Such gifts to non-government customers do not require pre-approval so long as they are valued below 125 USD. Any gift valued between 125 USD and 250 USD requires supervisor approval.

Any gift valued at USD 250 or more requires pre-approval from the Ethics and Compliance Global Lead.

There are slightly different rules when dealing with HealthCare customers. Meals expected to cost more than 125 USD per-person, all entertainment and all gifts (except Infor-logoed gifts that do not exceed 35 USD in value) require pre-approval from Infor's Ethics & Compliance Department using the [Principle Two](#) application. For questions, email ethics-compliance@infor.com

Gifts include, without limitation, material goods, as well as services, promotional premiums or other benefits.

Gifts, rewards or awards that Infor may provide as part of formal or company-sponsored programs and initiatives are not covered by these pre-approval and reporting requirements.

Meals, entertainment, and travel

Infor does not prohibit reasonable expenditures for meals, entertainment and travel expenses in connection with Infor customer conferences and other promotional activities for non-government suppliers and customers if they are otherwise lawful. These expenditures should be included on expense reports, approved pursuant to Infor's standard procedures, and properly accounted for in accordance with Infor policy.

Infor prohibits expenditures for activities that are inconsistent with the company's values or that could cause harm to the company's reputation or brand.





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“One of your customers, a Chief Information Officer at a utility, has invited you to lunch with a few members of her team to discuss whether it would make sense to have Infor participate in an upcoming RFP. Would it be permissible to pick up the tab for lunch?”

A

It depends. While Infor does not prohibit expenditures, including meals, relating to the demonstration or promotion of its products, you should remember that such activity is not permissible for any government supplier or customer. In this instance, you should first confirm whether the utility in question is privately owned or state-owned. If it's the latter, then all of its employees would be considered public officials and covering any sort of expenditure, even a meal, would be prohibited by Infor policy.

Sanctions, export controls & anti-boycott

All Infor representatives must comply with applicable restrictions placed on the export and re-export of U.S. products or components of products, goods, services and technical data. These restrictions apply to, among other things, certain technology and products, including specified computer software and technical goods and data.

Representatives are prohibited from discriminating against or refusing to do business with a country, its nationals, or companies that are the object of a boycott not sanctioned by the United States government.

Moreover, Infor representatives are prohibited from sharing information concerning Infor's or any other person's business relationships with a boycotted country or blacklisted company. If you receive a request to supply this type of information, take any action, or refrain from taking any action to further or support a boycott of a country, you should immediately contact the Ethics and Compliance Global Lead or the Legal Department.

Antitrust & fair competition

All Infor representatives must conduct business in compliance with all applicable antitrust and fair competition laws, which generally prohibit activities that restrain free trade and limit competition.

These laws, which can vary globally, are intended to promote healthy competition in the market and to protect the interests of consumers. Generally, conduct that could give rise to a violation of some these laws includes but is not limited to agreements to control or fix prices, boycotting certain suppliers or customers, dividing up markets among competitors, or structuring the production or sale of products with an anti-competitive purpose.

Given how complex these laws are, you should **always seek guidance from the Legal department if you have concerns** about an agreement you have been asked to enter into or you observe other conduct that you think may have an impact on Infor's ability to meet its commitment to conduct its business in full compliance with the law.

Q

“I am a sales rep. working in the IMEA region and I was just approached by an employee of an Iranian company who wants to do business with Infor. I understand that it may be unlawful for Infor to provide goods or services to a company in Iran, but I have a friend at a non-US company that provides similar services. Can I refer the Iranian company to the non-US entity?”

A

No. Under certain circumstances it may be unlawful for Infor to refer a sanctioned entity to a non-US company. Consult with Legal before taking any action with respect to an entity that may be subject to US sanctions. That includes entities that may be listed on the US Treasury's list of Specially Designated Nationals or companies located in a sanctioned country or region.

Anti-slavery & anti-human trafficking

Infor is committed to supporting human rights and avoiding complicity in human rights violations.

Violence, threatening behavior, unlawful child labor, forced labor, and/or human trafficking by any Infor representative or any third party wishing to do business with Infor will not be tolerated. Infor and all Infor representatives must at all times operate in compliance with applicable employment and labor laws and regulations related to child labor, forced labor, human trafficking, wages and work hours and freedom of association.

Infor has a variety of legal and regulatory obligations, some as a result of its government customers, which prohibits Infor and Infor representatives, and any third-party working on Infor's behalf, from: (1) engaging in severe forms of trafficking; (2) procuring commercial sex acts; (3) using forced labor; (4) denying access in any way to an employee's identity or immigration documents; (5) using misleading or fraudulent practices during the recruitment of employees or using recruiters that do not comply with local labor laws of the country in which the recruiting takes place; (6) charging employees recruitment fees; (7) failing to provide return transportation or pay for the cost of return transportation under certain employment arrangements; (8) providing or arranging housing that fails to meet the host country's housing and safety standards; and (9) failing to provide an employment agreement as required by law. Infor and all Infor representatives must comply with these requirements at all times. Violations of these laws may result in termination of employment and/or contract. Infor is required to and will inform the U.S. government of any credible suspected violations of U.S. law in this area.

Lobbying & political contributions

Infor, as a company, may on occasion make contributions to political parties or committees or to individual politicians. Any such contributions must be made in accordance with applicable laws and must be reported to and pre-approved by the Ethics and Compliance Global Lead or Infor's General Counsel.

Books & records

Infor's business records must be maintained completely and accurately. Infor representatives must accurately report and record all relevant business information. All transactions must take place in accordance with applicable management authorization and must be recorded in an appropriate manner. Infor representatives must reflect accurate and actual transactions that are in accordance with all applicable accounting and finance principles, policies, and practices.

The use of false or misleading documents or information to support Infor's transactions is strictly prohibited.



SECTION 3

TECHNOLOGY, INFORMATION SECURITY & PRIVACY

Protecting the privacy and securing the information of Infor representatives, customers and partners is a shared responsibility

Handling of confidential & sensitive information

Infor has considerable assets in the form of proprietary information, whether tangible or intangible, and these assets are critical to the company's competitive position. As such, **Infor representatives should always be mindful of maintaining the confidentiality of information that they acquire by virtue of their relationship with Infor.**

This includes but is not limited to information concerning the company and its customers, suppliers and competitors and other Infor representatives.

In addition, Infor representatives must safeguard proprietary information, which includes information that is not generally known to the public and has commercial value to Infor's business. Proprietary information can include business methods, analytical tools, software programs, source and object codes, trade secrets, ideas, techniques, inventions (whether patentable or not) and other information relating to economic analysis, designs, algorithms and research. It also includes, without limitation, information relating to marketing, pricing, and clients. Infor representatives are expected to be aware of restrictions regarding the dissemination of information they receive and ensure it is shared only with those who are authorized to receive it.

The obligation to preserve proprietary information continues even after employment ends. In addition to constituting a violation of our code, unauthorized use or distribution of proprietary information could also be illegal and result in civil or even criminal penalties.

Protection of customer data

Infor supports thousands of customers and often becomes a trusted custodian of their data. It is important that all Infor representatives understand that customer data may only be transferred, stored and processed in appropriately secured environments. The general-purpose Infor corporate environment, local lab environments and employee systems are not appropriate environments to store any sensitive customer data. This information must be placed into a secure environment explicitly approved to handle data.

The approval of the environment's security controls should come from the Chief Information Security Officer, the Chief Privacy Officer and Business Innovation or Cloud Operations teams. These groups will ensure the environments align to applicable regulatory and regional privacy requirements and guarantee that Infor is contractually protected prior to moving any customer data into those environments.

Use of Infor assets

Infor assets, including, without limitation, facilities, funds, materials, supplies, time, information, intellectual property, software, corporate opportunities and other assets owned or leased by Infor, or that are otherwise in Infor's possession, may be used only for legitimate business purposes of Infor. Infor assets are not to be misappropriated, loaned to others, donated, sold or used for personal use, except for any activities that have been approved in writing by the Chief Executive Officer or the General Counsel in advance, or for personal usage that is minor in amount and reasonable. Infor representatives are to report any theft, suspected theft or misuse to the General Counsel. Further, no Infor representative should violate security policies and procedures or invoke a program or code that could damage Infor's assets.

Social media use

Infor encourages its employees to become active providers of Infor's robust social media content and—where appropriate—to share information about our products and services around the world. We encourage our representatives to become brand ambassadors, and we trust our representatives to follow our guidelines to make sure they and Infor are protected in any social media exchange. Infor expects representatives to use their best judgment, and to exercise caution and thoughtfulness when using social media. For further guidance on social media and disclosure of company information, please contact the Infor Corporate Marketing team.

Monitoring & employee privacy

Please be advised that any expectation of privacy Infor representatives should have in any corporate office or when using corporate resources (including without limitation, email and other communication devices and company computers) shall be in line with the respective local laws.

Records creation & retention

All Infor representatives must create, retain and dispose of business records (both tangible and electronic) in compliance with Infor's policies and applicable regulatory and legal requirements.

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“A customer has an urgent deadline and has asked me to modify some sensitive data for him to get beyond an error they encountered while using an Infor application. The person is unable to execute the needed scripts and has insisted that I do this by accepting the transfer of sensitive data within the Infor corporate environment, executing the scripts and returning the information to him. What should I do?”

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You must explain to the customer that the security of their data is paramount to Infor and you have no authority to violate Infor's Code of Ethics and Conduct. Therefore, he must find a way to manipulate the data within their approved environments and not Infor's. If the customer continues to make this demand, you should report the situation immediately.

REPORTING OF VIOLATIONS & ADMINISTERING OUR CODE

Infor senior management has designated Infor's Ethics and Compliance Global Lead for the day- to-day implementation and administration of this code

General policy regarding reports of violations

Infor representatives who observe, learn of, or, in good faith, suspect a violation of this code or other wrongdoing that affects Infor have an obligation to speak up and report the concern as soon as possible. Various methods of reporting are available, as listed below.

Infor representatives should always feel comfortable discussing and reporting concerns without fear of reprisal. It is Infor policy that those

who report violations or suspected violations in good faith will not be subject to retaliation of any kind. Reported violations will be investigated and addressed promptly and will be treated confidentially to the extent advisable. A violation of our code may result in disciplinary action, which may include termination of the Infor representative's relationship with Infor.

How to report a concern or violation

Your immediate supervisor

Any member of management

Any local or corporate human resources leader

Any Ethics and Compliance resource

Any lawyer in Legal

Contacting the GuideLine

You may report your concern online by visiting www.mykochguideline.com. International toll-free phone numbers are displayed once you have selected your Koch company and country location, if you prefer to contact the GuideLine by phone. Posters with international toll-free GuideLine numbers may also be posted in your workplace.

1. Toll-free Hotline (Both U.S. and International Callers)

English speaking USA and Canada: 1-800-216-8007

All other countries: visit mykochguideline.com click on "Select your location" button and access the country in which you reside in the "Call Us" area.

2. Internet & intranet

To submit a question, or report a concern or a potential violation via the internet, visit mykochguideline.com and follow the online instructions.

3. Mail or e-mail

If you choose to report a concern in writing via the mail or electronic mail, the communication should be marked as "confidential and private." If a reporting party wishes to discuss the matter orally, he or she should indicate this in the submission and include a telephone number at which he or she might be contacted if the Ethics and Compliance Global Lead or General Counsel deem it appropriate.

The GuideLine is operated confidentially by an independent third-party. It is available 24 hours a day, 7 days a week, to respond to your questions and concerns (anonymously, if you choose and as allowed by local law). It also offers multilingual services. The GuideLine specialists notify the Ethics and Compliance department, which will assess and determine appropriate action.

When reporting, regardless of whether you choose to remain anonymous, please remember that the more detailed information you provide the greater the likelihood of the company performing an effective and complete investigation. Thus, please consider providing where and when the incident occurred, names and titles of the individuals involved, and as much other detail as you feel comfortable providing.

Proactively preventing problems is part of Infor's culture. Accordingly, the company urges employees and others to report potential improprieties without regard to the position or seniority of the individual(s) involved.

Infor Ethics and Compliance Team:

Email: ethics-compliance@infor.com

Ethics and Compliance Team Members:

Wes Edwards, Global Lead

Mike Voth, Strategic Initiatives

Kathy Haugen, Senior Program Manager

Sam Peace, Senior Counsel

Tokunbo Lad-Ojomo, Senior Counsel

How reports are investigated

Infor takes seriously all reported concerns and will investigate them as appropriate Upon receipt of a report, Infor's Ethics and Compliance Global Lead, in consultation with the General Counsel and Human Resources, will make a determination, in his or her reasonable judgment, whether a reasonable basis exists for commencing an investigation.

Investigations into violation of our code will be independent and every effort will be made to maintain the confidentiality to the extent permissible under applicable law. Investigations may result in recommendations for corrective actions and/or disciplinary measures where appropriate.

Infor representatives are required to fully cooperate with any inquiry or investigation conducted by the company. If a member of Infor senior management is the subject of a report, such member will abstain from any involvement in the consideration, deliberation or decisions with respect to such report—this includes the Ethics and Compliance Global Lead.





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Link to Resource Library

Use orange

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Timeline is central to each site

Logo & Navigation Strategy

Timeline, something to be used?

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Disciplinary action

Infor representatives who are found to have violated our code will be subject to discipline. The determination of the appropriate level discipline will be made by Infor management and subject to applicable local law. Such discipline may include, among other things, additional training, written notice to the Infor representative that Infor has determined that there has been a violation, censure by Infor, demotion or re-assignment, suspension with or without pay or benefits, or termination of the Infor representative's relationship with Infor.

Records of all violations of this code and the disciplinary action taken will be maintained by the Ethics and Compliance Global Lead and will be placed in the Infor representative's personnel file.

Infor will notify and cooperate with the law enforcement or other governmental authorities regarding acts of Infor representatives involving violations of law. In addition, some violations may result in Infor bringing legal action against employees or former employees to defend its rights vigorously.

Our code is not a contract

Our code does not create a contractual agreement or obligation of the company to any individual, nor does it create an employment relationship with any third-party agents, contractors or other non-employees. Our code does not prohibit Infor from terminating the employee relationship, subject to local laws or a written contract signed by a duly authorized officer of the company.

Approval & amendment of our code

Our code has been approved and adopted by Infor management. Infor is committed to reviewing and updating its policies and procedures on a continuing basis. Therefore, our code may be revised, changed or amended at any time without notice.



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