

Third Party Partner Code of Conduct

Our guiding principles, trust and core values

We believe all great companies have one thing in common – they are trusted. Great companies maintain cultures in which their employees thrive by building trust with each other and with all other stakeholders of their businesses. We believe in building trust through ethical, passionate, kind, customer-focused and relentlessly innovative conduct. Our [Core Values](#) reflect these aspirations, and they are more than just aspirational - they are at the heart of our culture. They tell you who we are and how we act, every day. Not only do these high standards apply to us and our legacy of integrity and trust, but they extend to our suppliers, vendors, consultants, partner-network members, and their employees, consultants, subcontractors and anyone such parties work with or contract with as part of their relationship with Hyland (“Third Party Partners”). We believe a strong relationship with our Third Party Partners is one of the keys to ensuring our company's success.

Purpose

This Third Party Partner Code of Conduct (“Code”) communicates our expectations to our Third Party Partners and our expectations according to law and our [Core Values](#) - ensuring consistent compliance from all of our Third Party Partners.

Expectations

We expect our Third Party Partners to be committed to high standards of ethical conduct in all of their business activities and to comply with all applicable legal requirements, laws and regulations. Third Party Partners must conduct themselves with integrity and not engage in illegal or unethical conduct or activities.

Risk management and monitoring

Third Party Partners must have, maintain and continually develop policies, processes, procedures and systems designed to comply with applicable laws and regulations; identify, monitor and manage risk; provide for ongoing training and assessments, monitoring and continued improvement, including corrective action processes; each of which, at a minimum, address the areas set forth in this Code. In addition, Third Party Partners must conduct appropriate due diligence, risk management and monitoring related to its own third party partners, including its supply chain who may provide services or products in relation to Hyland's business.

Accuracy of business records

We are committed to the integrity of our business records and ensuring that our books, records, and financial reporting are accurate and complete. We require Third Party Partners to maintain up-to-date business and financial books, records, and statements to demonstrate compliance with applicable laws and regulations and their commitments to Hyland. Upon Hyland's request, Third Party Partners will provide evidence supporting such compliance.

Labor and human rights commitment

This Code is rooted in a deep commitment to human rights.

We expect all Third Party Partners to be committed to upholding fundamental human rights and the belief that all human beings should be treated with dignity, fairness and respect. Third Party Partners shall only engage in business with third parties who demonstrate this same commitment and operate in compliance with human rights laws.

No forced labor, slave labor or human trafficking. Third Party Partners must not engage in, use or tolerate human trafficking or any form of forced, slave, or compulsory labor.

No child labor. Third Party Partners must not employ children under the minimum legal age of employment, as defined by national law or international conventions.

Freedom of association. Third Party Partners must respect the right of workers to freely associate, join unions, and engage in collective bargaining.

Fair wages and benefits. Third Party Partners must provide compensation that meets or exceeds legal minimum wage requirements and ensure that benefits are fair and appropriate.

Non-discrimination. Third Party Partners must not discriminate based on race, color, gender identity or expression, religion, age, disability, nationality, veteran status, sexual orientation or any other characteristic protected by law.

No-harassment. All workers have a right to a workplace free of harassment and abuse. Third Party Partners must prohibit all types of harassment including, but not limited to physical, verbal, psychological and sexual harassment.

Immigration. Third Party Partners must comply with applicable immigration laws and regulations in any jurisdiction where they operate and only employ workers with a legal right to work in the relevant location.

No charging worker-paid recruitment fees. Third Party Partners will not charge worker paid recruitment fees.

No confiscation of worker original identification documents. Third Party Partners will not confiscate workers original identification documents.

Responsible sourcing – conflict minerals. Third Party Partners must comply with international standards and regulations regarding the sourcing of minerals, particularly those related to conflict minerals. Third Party Partners must ensure that their supply chain does not

contribute to the financing of armed conflict or human rights abuses in areas of conflict. Further, Third Party Partners that provide any products or services to Hyland shall have a due diligence system in place to track and monitor human rights and associated environmental risks respecting the extraction, transport and use of raw materials.

Health and safety

Third Party Partners must maintain a safe and secure work environment to enable their employees to focus on their work and to foster a healthy work environment. Third Party Partners must adhere to all environmental, worker safety and health laws applicable to their work force; and provide their work force with appropriate safety training, equipment and protective gear where necessary. Third Party Partners shall only engage in business with third parties that share this commitment to adhere to environmental, worker safety and health laws applicable to their workers.

Emergency prevention. Third Party Partners must identify and assess potential emergency situations in the workplace. Third Party Partners must develop and implement emergency plans and response procedures, including but not limited to fire alarms, fire drills, exit facilities, fire detection and suppression equipment, and recovery plans to minimize harm to life. Third Party Partners must regularly test emergency preventative methods, such as fire alarms, to ensure that they are in working order.

Infectious disease preparedness and response. Third Party Partners must develop, implement, and maintain a program to prepare for, prevent, and respond to the potential of an infectious disease outbreak among its employees or facilities.

No substance abuse. Third Party Partners must create and maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances.

Protect the environment

We strive to always be conscious of our operations and to continue to find ways to limit our climate and environmental impact. Third Party Partners are expected to operate in an environmentally responsible manner and minimize their environmental impact which includes the following:

- Adhering to environmental laws and regulations related to waste management, emissions, and resource usage.
- Implementing sustainable practices such as energy efficiency, waste reduction, and the use of renewable resources where feasible.
- Continuously working to minimize the carbon footprint of operations and products.

Fair competition

Third Party Partners must conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which they operate. Third Party Partners must avoid practices such as price-fixing, collusion, bid rigging or other forms of anti-competitive behavior.

No improper payments

Third Party Partners may never engage in any kind of bribery or kickback to obtain business or to continue a business relationship. Third Party Partners must conduct their business in full compliance with all applicable foreign and domestic antibribery, anticorruption and antikickback laws.

Gifts and entertainment

Third Party Partners may not offer or accept anything of value from prospective or current business partners to obtain unfair business advantages. Any gifts or entertainment must comply with applicable laws and regulations. Nothing of value, including gifts or entertainment, should be offered or accepted if it will create a feeling of obligation, compromise judgment or appear to improperly influence the recipient.

Third Party Partners should not offer any gifts or entertainment to Hyland workers or anyone acting on behalf of Hyland if intended to influence a Hyland decision or in violation of Hyland policy.

Conflicts of interest

Third Party Partners may not engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests, and obligations to Hyland. Third Party Partners must conduct business openly and transparently and must immediately notify Hyland of any conflict of interest by emailing Hyland at hylandlegalcompliance@hyland.com.

No money laundering

Third Party Partners will comply with applicable anti-money laundering laws and will conduct business only with reputable parties involved in legitimate business activities and transactions. Third Party Partners may not engage in concealing illicit funds, unlawful diversion, other suspicious activities, or assist others in doing so. Third Party Partners shall closely monitor every transaction and take measures to prevent money laundering and other financial crimes.

No tax evasion

Third Party Partners may not engage in tax evasion, circumvent true tax liabilities, or assist others in doing so.

Trade and export controls

Third Party Partners will comply with applicable government import/export trade regulations and customs of the United States and of any jurisdictions in which Third Party Partners transact business. Third Party Partners will comply with any United States and other government-issued economic sanctions regimes that prohibit transacting business in certain locations and with certain organizations or individuals. In addition, Third Party Partners conducting business on behalf of



Hyland or selling Hyland products or services must have an appropriate third-party due diligence and denied party screening program in place to ensure they are not conducting business with sanctioned parties.

Accessibility

Hyland is committed to a culture of accessibility. With over one billion people around the world living with a broad range of disabilities, to achieve our purpose to deliver life-changing value to the world, we are committed to creating products and services that are accessible to those with disabilities. Third Party Partners that deliver products or services to Hyland will comply with all Hyland provided accessibility requirements and standards, as well as those required in our contracts or required by applicable law. For example, for Hyland purchases from Third Party Partners that include a User Interface (UI), the UI must conform to Level A and AA Success Criteria of the latest published version of the Web Content Accessibility Guidelines (“WCAG”), Section 508 of the Rehabilitation act, and the European standard EN 301 549. Such Third Party Partners shall complete and provide the latest published Voluntary Product Accessibility Template (VPAT) International Edition.

Intellectual property rights

Third Party Partners must respect the intellectual property rights of Hyland and others.

Confidential information

Third Party Partners will safeguard Hyland confidential information it has access to, including taking steps to make sure appropriate protections are in place to prevent disclosure or misuse of confidential information. Third Party Partners will comply with non-disclosure agreements and other agreements regarding confidential information.

Privacy

We respect and are committed to protecting the privacy rights of our employees, customers and third parties that use our products and services. Third Party Partners must comply with all applicable privacy laws, regulations and agreements regarding privacy and personal information. Third Party Partners must take appropriate steps, including administrative, technical and physical, to safeguard personal information against theft, loss, misuse, unauthorized access, alteration, disclosure and destruction.

Artificial Intelligence (AI)

We are committed to responsible AI practices and expect the same commitment from our Third Party Partners. Third Party Partners must develop and use AI in a transparent, accountable, and ethical manner, ensuring compliance with applicable laws and minimizing bias. AI systems should be reliable, secure, explainable, and subject to appropriate human oversight, with a focus on long-term societal impact and responsible practices. Third Party Partners that deliver AI enhanced products or services must comply with all Hyland AI requirements and standards.

Speak-up – whistleblower protection

Third Party Partners are expected to create and maintain a whistleblower/complaint system for their workers that protects whistleblower confidentiality and prohibits retaliation against workers who participate in good faith.

Third Party Partner assessment and monitoring

While Third Party Partners are expected to self-assess and demonstrate compliance with this Code, Hyland may assess and review Third Party Partner's compliance. In addition to any other contractual requirements and obligations, this may include, but is not limited to, Third Party Partners completing applicable questionnaires and/or assessments, providing applicable certifications or attestations of compliance, and successfully completing Hyland's onboarding processes and periodic reviews. In addition to any other terminations rights under any contract between the parties, Third Party Partners engaging in unlawful conduct or failing to comply with this Code risk suspension or termination of their business relationship with Hyland.

Corrective action process

Third Party Partners must maintain a process for timely correction of deficiencies or violations of this Code that are identified through review, assessment, audit, inspection, or investigation.

Raising concerns and reporting inappropriate behavior

Third Party Partners shall report any inappropriate conduct or potential violations of this Code or law to Hyland. To report, Third Party Partners are encouraged to promptly reach out to their Hyland main point of contact. If that is not possible or appropriate under the circumstances, Third Party Partners should contact Hyland at hylandlegalcompliance@hyland.com.

Hyland will maintain confidentiality of any such report to the extent possible. Also, we seek to create and maintain an environment in which individuals may raise any matters of concern to Hyland, without fear of retaliation. In support of this environment, we prohibit retaliation against any individual who makes a good faith report of suspected or actual misconduct or non-compliance with this Code, or who cooperates honestly in an investigation of any suspected or actual misconduct or non-compliance. This freedom from retaliation applies whether or not it is determined that the reported conduct is actually misconduct or non-compliance.

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