Red Hat Procurement
Supplier Code of Conduct

1. INTRODUCTION

This Supplier Code of Conduct explains Red Hat's (including its subsidiaries) general expectations for **all third parties supplying goods or services to or on behalf of Red Hat**, including staffing agencies and independent contractors. In this Supplier Code of Conduct, we refer to these third parties, including their employees, personnel, agents, and subcontractors, as "Suppliers."

Red Hat values integrity, respect and ethical conduct, as well as the commitment and courage it takes to hold each other accountable when we fail to adhere to those values. We expect that our Suppliers will uphold these values and monitor their own compliance with this Supplier Code of Conduct.

2. COMPLIANCE WITH LAW

Suppliers must conduct their business activities in full compliance with this Supplier Code of Conduct and all applicable laws and regulations while conducting business with and/or on behalf of Red Hat, including, without limitation, laws regulating:

A. Trade, exports and competition
B. Labor
C. Insider trading
D. Anti-corruption
E. The environment (including conflict minerals)
F. Record keeping
G. Health and safety
H. Data privacy and protection

3. GIFTS AND GRATUITIES

Supplier representatives and employees must not offer to any Red Hat employee or representative any bribe, kickback, favor, gratuity, entertainment or anything of value, either directly or indirectly, in order to obtain or retain business or otherwise gain favorable treatment or an improper advantage from Red Hat. As long as a gift is not intended to obtain an

unfair or improper advantage for the supplier and does not create the appearance of a bribe, kickback, payoff, or irregular type of payment, Red Hat employees are allowed to accept the gift if (a) it is of nominal value, (b) public disclosure would not embarrass or reflect negatively on Red Hat, (c) acceptance is consistent with applicable country law and local customs, (d) providing the gift is consistent with the Supplier's business practices and policies, as may be revised from time to time, and (e) acceptance is consistent with Red Hat's business practices and policies, as may be revised from time to time.

4. CONFLICTS OF INTEREST

Suppliers shall not enter into any financial or other relationship with a Red Hat employee or any other party that creates or appears to create a conflict of interest for Red Hat. Supplier representatives and employees shall not deal directly with any Red Hat employee whose spouse, domestic partner, other family member or relative holds a significant financial interest in the Supplier. All such conflicts must be disclosed to and approved by Red Hat management.

5. REPORTING CONCERNS

You should report to Red Hat any conduct, including conduct of any Red Hat employee or representative, that you believe in good faith to be a possible violation of this Supplier Code of Conduct, another Red Hat policy, or regulation or law. We refer to these possible violations as "Supplier Concerns."

If appropriate, you may work with your primary Red Hat contact to address a Supplier Concern. If that is not possible or appropriate, please contact Red Hat about any Supplier Concern through either of the following methods:

> **Mail:** Mail a letter to the General Counsel at Red Hat, 100 East Davie Street, Raleigh, NC 27601.
> **Email:** Send an email to supplierconcerns@redhat.com.

Red Hat values confidentiality and will take reasonable measures to preserve confidentiality in light of the circumstances of any particular report. Red Hat will review and respond as appropriate to reports regarding Supplier Concerns.

Red Hat expects that its Suppliers will not retaliate against anyone who makes a good faith report of a Supplier Concern, whether that report is made internally at the Supplier or to Red Hat.

6. DATA PRIVACY/SECURITY

Suppliers are expected to safeguard and protect all confidential information from misuse or unauthorized disclosure. If Supplier receives personal data or other confidential information from or on behalf of Red Hat, such data or information should be processed and stored securely and shared only internally with those Supplier representatives and employees who require access to it in order to perform their assigned roles and responsibilities. Confidential information and personal data must not be transferred, published, used, or disclosed other than as necessary to provide services to Red Hat or as expressly directed or authorized by Red Hat.

7. USE OF RED HAT TRADEMARK

Unless expressly authorized by Red Hat, Suppliers may not use the Red Hat trademark, images or name or other materials in which Red Hat owns the copyright. If authorized, such authorization must be in writing and subject to compliance with Red Hat's trademark guidelines set forth at https://www.redhat.com/en/about/trademark-guidelines-and-policies (including any successor site).

8. HUMAN RIGHTS AND LABOR PRACTICES

Red Hat strongly opposes illegal human trafficking and forced labor (and all other forms of modern slavery) in any form. Suppliers shall comply with slavery, human trafficking and child (and minimum age) labor laws of the country or countries in which they conduct business, shall ensure that slavery, servitude, forced or compulsory labor (including prison labor) and human trafficking are not taking place in their supply chains, and shall deal honestly, ethically, and fairly in these relationships.

Red Hat expects that its Suppliers will promote a workplace free of harassment, abuse and unlawful discrimination. Although we recognize that what constitutes "unlawful" discrimination may vary by jurisdiction, we expect that Suppliers will treat people fairly in hiring, compensation, access to training, promotion, termination and retirement, and will not discriminate based on any protected characteristics (for instance, race, color, religion, sex, sexual orientation, gender identity, national origin, disability, or age).

Suppliers must also afford their workers humane working conditions and wages and working hours that comply with applicable laws, while also respecting the legal rights of workers to freely associate and bargain collectively, including by joining or refraining from joining trade unions.