



WORLD WIDE TECHNOLOGY

Code of Conduct





DAVE STEWARD
CO-FOUNDER & CHAIRMAN

JIM KAVANAUGH
CO-FOUNDER & CEO

A Message from Our CEO



When I look at how far and how fast WWT has grown over the last quarter century, I can't help but be humbled. But for as much as we have already achieved, I have never been more excited about the opportunity that lies before us. Our people, our culture, our performance, and the spirit of innovation at WWT are stronger than ever.

However, we can only achieve continued success through vigilance and commitment to WWT's Core Values, and protection of the WWT brand. Our reputation as an honest and ethical company is critical to maintaining the trust of our customers, being a great place to work for our employees, and being good stewards of the communities in which we live and serve. To achieve this, we must work together. The character of any organization—its culture—is driven by the behavior of its people. To be effective, ethics and compliance must be a central part of the entire leadership training and development program, and must be communicated throughout the organization. The WWT Code of Conduct is designed to support that goal. It outlines performance expectations and provides practical guidelines for handling difficult situations that you may encounter in the workplace. Each of you is responsible for understanding and acting upon the principles outlined in the Code as you conduct business every day. WWT is fully committed to operating at the highest levels and standards of ethics and compliance. If you believe or suspect that our Code is being violated, I ask that you speak up—talk to your manager, any member of the Executive Team, or the Legal Department. You can also report any concerns anonymously through the Ethics and Compliance Helpline. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.

With your commitment to integrity and our Core Values, I know we will achieve our Vision to be the best technology solution provider in the world. Thank you.

Sincerely,

JIM KAVANAUGH

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WE KNOW THE CODE

The WWT Code of Conduct (the “Code”) applies to all directors, officers, and employees of WWT and its subsidiaries, and anyone authorized to act on behalf of WWT – our agents and contractors are also expected to read, understand, and abide by this Code, as well as the corporate policies that support it.

Applying the Code

The Code is a resource to guide your business conduct at WWT every day. Many of the principles described in this Code are, however, general in nature. The Code does not cover every situation that may arise, and is not the exclusive source of guidance and information regarding the conduct of our business. Use common sense and good judgment in applying this Code. Familiarize yourself with and consult applicable company policies and procedures in specific areas as they apply. If you have any questions about applying the Code, it is your responsibility to seek guidance.

WWT will promptly and thoroughly investigate any reported or suspected violations of the Code or applicable law. WWT expects all employees to cooperate in investigations fully and candidly. WWT will take the appropriate disciplinary action in response to each case, up to and including termination of employment, for those involved in the violation. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.

Make Good Decisions

You are responsible for applying common sense, together with your own highest personal ethical standards, in making business decisions where the Code doesn't provide direct guidance. For any situation, before you act, consider the following:

- Is this action legal, ethical, and socially responsible?
- Does this action comply with both the spirit and the letter of our Code?
- Will this action appear appropriate?
- Is it clear that our company would not be embarrassed or compromised if this action were to become known within our company or publicly?

Unless the answer to any question is “yes,” the action should not be taken.



QUESTION: I reported a concern through the Ethics and Compliance Helpline but never heard whether it was investigated or some other action was taken.

ANSWER: If you made your report anonymously, the investigator may not have been able to get in touch with you. Even if the investigator was able to reach you, he or she may not have been able to share the outcome because of privacy and confidentiality concerns. In any case, you should not hesitate to follow up—you can post a follow up question to your initial report, or place a call back to the Helpline and ask whether the matter has been resolved.

HONESTY AND INTEGRITY COME FIRST IN OUR BUSINESS DEALINGS

We expect all our employees to observe the highest ethical standards when conducting business, and to be fully committed to serving our customers and employing individuals with personal standards consistent with those Core Values.

We work in a fast-paced industry. However, getting the deal done can never come at the expense of doing the right thing. At WWT, we are transparent, open, and honest with our customers, business partners, and with each other. We comply with both the letter and the spirit of our Code, and observe the highest ethical standards when conducting business. This means you must understand and comply with all of our policies, as well as all laws and regulations that apply to your job. There can be no tradeoffs between WWT's Core Values and our performance.

We want all WWT employees to have the courage to make the right decisions when they find themselves at the crossroads of meeting a tough business commitment and doing the right thing. We want and expect all employees and agents to ask questions when in doubt about the appropriateness of a situation and to report known or suspected violations of the Code, applicable laws, rules, regulations, policies, and procedures.

Leaders Serve as Ethical Role Models

Leaders at WWT occupy a unique position of trust. We look to our leaders to lead by example, live our Core Values, and be ethical role models for all employees. As a leader, you need to:

- Ensure that employees you supervise understand the Code and any other policies, laws, or regulations that apply to their jobs
- Create an open line of communication where employees feel comfortable raising concerns without fear of retaliation
- Promptly take action to address concerns and correct problems that arise



QUESTION: Suppose my boss asks me to do something that I think is wrong. What should I do?

ANSWER: WWT relies on you to use your best ethical judgment. Don't do anything that you believe may be wrong. First, you might raise your concerns directly with your manager. If your manager does not adequately address your concerns, or if you are uncomfortable talking about the issue with your manager, consider going to HR, informally and confidentially with the Legal Department, or anonymously through the Helpline. The important thing is to not take any action that you know or believe to be against the Code.

QUESTION: What happens if I am faced with a situation where acting ethically conflicts with making a profit for the company?

ANSWER: You must always engage in legal and ethical conduct no matter what the circumstances. WWT's long-term profitability depends on our reputation. If you feel that there is a conflict between what is "right" and what is profitable, you should contact your supervisor, HR, Legal Department, or any of the other resources listed in this booklet for guidance.



Gifts & Entertainment

Modest gifts, favors, and entertainment are a routine part of doing business and are often used to strengthen business relationships. However, no gift, favor, or entertainment should be accepted or given if provided in exchange for unfair or undue business influence, or if it could be perceived as an attempt to improperly influence a business outcome. Our Gift and Gratuities Policy outlines WWT's rules around the giving and receipt of gifts and entertainment.

You are not permitted to offer, accept, or receive a gift or entertainment from a customer or business partner if it:

- Is in cash or a cash equivalent
- Is not consistent with customary business practices
- Is extravagant in value
- Can be construed as a kickback, bribe, or payoff in violation of any law, including a bribe to a government official in violation of the U.S. Foreign Corrupt Practices Act
- Violates any other laws or regulations
- Could cause embarrassment to or discredit our company if disclosed

Specific laws apply to interactions with government officials and employees. For example, the U.S. and other countries have strict laws that may prevent providing anything, including food or beverages, to a government employee. When doing business with government agents, employees, or officials, be sure you understand applicable laws as well as local customs and norms. Discuss any proposed gifts to government officials with your supervisor or the Legal Department.



QUESTION: Can WWT pay for a customer's or supplier's travel to visit WWT facilities?

ANSWER: Yes, with manager approval. Travel must be directly related to promoting, demonstrating, or explaining WWT's products or services or executing or performing a contract. The amount should also be reasonable in light of the business purpose. WWT should not pay for a side trip to Vegas or an extra couple of days to sightsee. Entertainment must be proportional to the business purpose of a trip. Gifts must be not as a quid pro quo for any official action or to get business. They should be of modest value consistent with local law and the customer's ethics policy, and never be the form of cash. All items must be accurately reflected in WWT's books, records, and accounts.

QUESTION: I've been asked to participate in a local customer-sponsored golf event. May I attend the event?

ANSWER: This kind of business entertainment is acceptable because it builds your relationship, it can generate goodwill, and it is not lavish. Always consider whether the event would influence or appear to influence a decision about the customer. Also consider whether it has a business purpose, how it appears to employees and others, and whether attendance benefits our company. If it requires travel, you need to talk to your manager.

QUESTION: An important customer of our company has requested that we go to dinner at a local club that provides "adult" entertainment. Can I comply with his request?

ANSWER: No. Sexually-oriented "adult" entertainment venues violate our Code of Conduct. Do not conduct business entertainment with customers, suppliers, or other business associates in these or any other venues that may embarrass our company.

QUESTION: The mayor of our town is coming to visit our location. May I provide samples of our products and a gift bag including WWT logo items?

ANSWER: Many local officials are prohibited from even accepting a cup of coffee. Consult with the Legal Department before preparing any type of gift for local officials.

QUESTION: In our business, we are expected to offer expensive gifts and lavish entertainment. We can't compete effectively if we appear ungenerous. What should I do?

ANSWER: Gifts and entertainment are things of value and, in some cases, you will need manager approval before offering the item. Some gift giving and entertaining will be allowed, but care must be taken to avoid the appearance of undue influence. See our Gifts and Gratuities Policy for further guidance. Note that if a government official or politician is the recipient, you must consult with the Legal Department to ensure that we can offer the item without violating the law. If you have any doubt about the propriety of a gift or entertainment, do not give it.

Conflicts of Interest

Every employee, officer, and director of our company is expected to act in the best interest of WWT and to protect our reputation from any conflicts. We should also be sensitive to even the appearance of a conflict. This means that everyone should avoid any investment, interest, association, or activity that may call WWT's fairness or integrity into question, or that may interfere with your ability to perform your job duties objectively and effectively. Many potential conflicts of interest can be avoided simply by making full disclosure of the situation to your supervisor or functional leader. While it is impossible to list all activities that could pose a conflict of interest, the following are common examples:

- **Owning, directly or indirectly, a significant financial interest in a competitor or supplier**
- **Holding a second job that interferes with your ability to do your regular job**
- **Consulting or serving on the board of a competitor, customer, or supplier**
- **Hiring a supplier managed or owned by a relative or close friend**

Serving on the board of directors or an advisory committee of for-profit and non-profit organizations may present conflicts of interest. Before agreeing to serve on the board or an advisory committee of any for-profit organization, contact the Legal Department to determine the relationship, if any, existing between our company and the for-profit organization. To make sure activities relating to non-profit or community organizations do not create a conflict of interest or other problem, you should notify your supervisor of your prospective membership before you agree to the board service. You may not serve on the board of directors of a company or organization that raises the potential for a significant conflict of interest (e.g., certain competitive, supplier, or customer relationships). If approved for serving on the board of directors of an outside company or organization, you may not conduct outside business during working hours or use company assets or information in any work for another business.



QUESTION: My wife works for one of WWT's competitors. Does this constitute a conflict of interest?

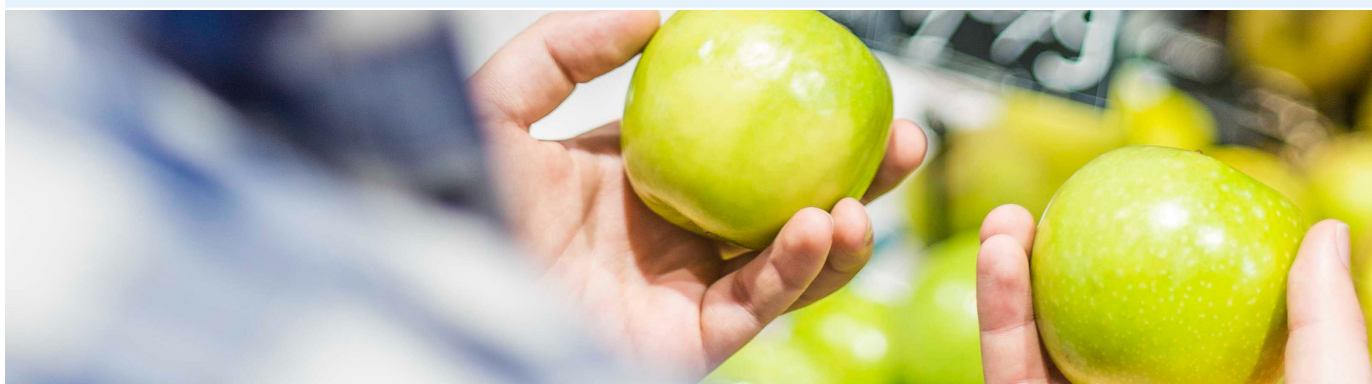
ANSWER: No, not necessarily. However, you should discuss the situation with your manager to make sure you are not given assignments that would create a conflict of interest. In no event should you disclose our company's confidential information to your spouse or solicit from your spouse confidential information about her employer.

QUESTION: May I hire my brother to do some contract work for WWT if his rates are the best rates available?

ANSWER: Only if your brother submits a proposal that is evaluated in the same manner as all other WWT suppliers, and you do not participate in the evaluation or selection process. WWT cannot hire him to perform services under a contract if he will be working under your supervision or if you have any influence over the decision to engage him.

QUESTION: I am thinking about accepting an offer for a second job with a firm that provides technical support to some of WWT's customers similar to that provided by WWT. I don't think the other firm competes directly though. How should I proceed?

ANSWER: The proposed second job could present two potential conflicts. First, the firm offering you employment may in fact compete with our company. Therefore, working for that firm could be a conflict for you. Second, the time you spend working for the second firm could conflict with your duties at this company. In matters such as these, you should either decline the offer or, before you accept it, consult with your manager or the Legal Department, who will review the situation.



Selection & Use of Vendors/Suppliers (Fair Purchasing)

Our procurement decisions are made on a competitive basis and consider the total value received, which includes quality, suitability, performance, service, technology, and price. Proper procurement conduct includes:

- Using established corporate-wide or regional supply (leveraged) agreements
- Obtaining competitive bids when leveraged agreements do not exist
- Confirming the financial and legal status of the supplier
- Verifying quality and service claims on a regular basis
- Making sure that purchase agreements clearly state the services or products to be provided, the basis for earning payment, and the applicable rate or fee
- Verifying that invoices clearly and fairly represent goods and services provided
- Avoiding reciprocal agreements or exchanges of favor

WWT pays fair value for all goods and services received. Payments can only be made to the person or the firm that actually provides the goods or services, and must be made in the supplier's home country, where it does business, or where the goods were sold or services provided, unless approval is obtained from the Legal Department.

WE COMPLY WITH THE LAW

As a member of the WWT team, it is important that you are aware of, and never intentionally violate, this Code and any relevant laws and regulations.



A violation of the Code or law not only damages our company's standing in the communities we serve – it may also be a crime. In those cases, possible consequences include legal proceedings, and civil and criminal penalties that could affect you personally as well as the company. You should also be alert to changes in the law or new requirements that may affect your business unit, as well as new products or services that may be subject to special legal requirements.

Q&A

QUESTION: How do I know whether a particular law impacts my job?

ANSWER: Ask your manager, or feel free to contact the Legal Department directly to seek clarification. In addition, there are a number of resources given to employees to help them understand the rules that apply to their work. This Code, our Policies, mandatory training programs, and other standard operating procedures for your department are all designed to ensure that you stay on the right side of the law. However, if you ever have any questions about whether something is or is not permitted by law, you are encouraged to contact the Legal Department for advice.

Anti-corruption & Anti-bribery

The exchange of appropriate gifts and entertainment is often a way to build our business relationships. However, you must conduct business with customers, suppliers, and government agencies (including U.S. and non-U.S. governments) without giving or accepting bribes, including (but not limited to) commercial bribery and kickbacks.

Q&A

QUESTION: What is the difference between a “gift” and a “bribe?”

ANSWER: A “gift” is made with “no strings attached” in the interest of, for example, building a business relationship or expressing thanks. A “bribe” occurs if you accept or give something of value to someone in return for something else, such as the award of business or the exercise of the other's discretion or influence.



Trade Compliance (Export & Import Control)

A significant part of our business involves the receipt and shipment of products and technical data around the globe. Some products are subject to special import and export control laws that restrict transfers, exports, and sales of products or technical data to certain countries, organizations, and/or individuals. U.S. law prohibits transactions with certain persons or entities that have violated export-related laws or are believed to pose a threat to national security. Additionally, doing business with certain countries may result in imposed economic sanctions. We must perform due diligence before any transaction that has an international element to determine whether such parties are on the U.S. government's restricted list. WWT complies with all applicable import and export laws and regulations in any country where we do business. If you are involved in importing and exporting goods and data, you are responsible for knowing and following these laws. If you have questions or need advice, contact the Trade Compliance team or the Legal Department to ensure that all such transactions are properly evaluated to prevent potential violations.

DID YOU KNOW...

An "export" is not limited to the physical shipment of products. Technical data can also be controlled items requiring special handling. Additionally, transfers of controlled products or information to foreign individuals can also be a deemed export. For example, in the United States, if an item is controlled under the International Traffic in Arms Regulations (ITAR), transfer of that item to a non-U.S. person is a deemed export (even if they are in the U.S. at the time of the transfer).

Q&A

QUESTION: We have received an order from a new customer. The customer is in a country where we are allowed to ship, but we have heard that the customer may have close ties to a regime in a country where we may not ship. Payment will be made in the currency of yet another country. It's a big sale and our local representative says not to worry. Can we just assume that the products will be used in the country where we are shipping, or is this a problem?

ANSWER: The information you have indicates that the products might be shipped to a prohibited country. Clearly, there are enough warning signs here that you need to get advice from our Legal Department before acting.

QUESTION: I was told I should pay a gratuity to a minor official to clear our products through customs. What should I do?

ANSWER: You may not pay a U.S. customs official under any circumstance. In some countries outside the U.S., small payments to expedite a routine action may be made, but only under limited circumstances. You must consult with the Legal Department to determine if the requested gratuity will qualify. You must also receive approval of the payment from the Legal Department and your managing director before any action is taken.

QUESTION: Our products take several days to clear customs in certain countries. Our freight forwarder says he can expedite the process by paying the approving agent an extra fee, and it is quite a large amount. May I approve the extra cost?

ANSWER: This is a payment to a government official and needs to be approved in advance by the Legal Department and your managing director. It does not matter that the payment may be made by our freight forwarder. It is still attributable to our business.

Government Customers & Contracting

Doing business with the government requires that we comply with specific rules and regulations. When doing business with federal, state, or local governments, it is imperative that all statements, representations, and documents provided to government procurement officials (including information contained in invoices, quotes, and other materials) are accurate and truthful. If your assignment directly involves the government or if you are responsible for someone working with the government on behalf of WWT, be alert to the special rules and regulations applicable to our government customers. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should be avoided when dealing with government officials and employees. Failure to avoid these activities may expose the government agency, the government employee, our company, and you to substantial fines and penalties.

Please see the [WWT GOVERNMENT CONTRACTING GUIDE](#) for more information about doing business with the Federal Government.

Insider Trading

From time to time, through our relationships with public company customers, suppliers, and business partners, WWT and its employees may be exposed to material non-public information about one of those public companies. Information is “non-public” if it has not been made generally available to the public by means of a press release or other means of widespread distribution. Information is “material” if a reasonable investor would consider it important in a decision to buy, hold, or sell stock or other securities. As a rule of thumb, any information that would affect the value of stock or other securities should be considered material. Examples include knowledge of a pending merger or acquisition, the introduction of a new product line, or product recalls.

Federal securities laws around insider trading are specific and complex – but understand that if you find yourself in possession of material, non-public information about a public company, the law prohibits trading in securities of that company. You also may not engage in “tipping” or suggesting that anyone else buy or sell stock or other securities of that company based on material, non-public information.

Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the company, including potential termination of employment. If you are uncertain about the constraints on your purchase or sale of securities of any other company that you are familiar with through your role with the company, you should consult with the General Counsel before making any such purchase or sale.

Money Laundering

Money laundering is conduct designed to disguise proceeds of criminal activity by individuals or entities. Our company will not condone, facilitate, or support money laundering. Be alert to requests for payments to be made in unusual ways and for business partners who appear to lack integrity in their operations. Signs to watch for:

- **Requests for cash payment, traveler’s check, or checks to or from an unknown third party**
- **Complex payment patterns**
- **Unusual transfers to or from countries not related to the transaction**
- **Business partners who seem eager to avoid record-keeping requirements**
- **Transactions which are inconsistent with usual business practices, or which do not match the business partner’s normal pattern of activity**



QUESTION: A customer has asked that we pay them through multiple accounts and using a combination of multiple payment types (cash, check, etc.). What should I do?

ANSWER: This is suspicious money laundering behavior. You should immediately consult our Legal Department; and you should only take further steps in the transaction, including accepting payment from the counter-party, after the Legal Department has advised you how to proceed.

Legal Matters

The Legal Department is responsible for providing or seeking quality legal services for all legal matters globally for WWT. In addition, the Legal Department oversees processes to help ensure the company's compliance with all laws and regulations, and helps to protect legal privilege, as applicable. Outside counsel may only be hired through the Legal Department, and the Legal Department must be notified immediately if you receive any legal notices relating to the company's business.



QUESTION: What happens if I receive a subpoena for documents or testimony?

ANSWER: Do not attempt to respond to the issuer of the subpoena directly. A subpoena usually requires a quick response, so forward it immediately to the Legal Department.

QUESTION: I just received a call from a government agency requesting information on one of our customers. Should I provide the requested information?

ANSWER: You should contact the Legal Department before providing any information to a government agency. Our company always seeks to cooperate fully with law enforcement investigations, but it must also consider certain additional considerations, such as obligations of confidentiality and the potential liability to a customer for providing information beyond that which is appropriate under the law.

QUESTION: I would like to better understand how to interpret certain laws that impact my area of the business and understand how other companies work within the system. Can I engage legal counsel to advise my team? We will fund from our budget.

ANSWER: You should contact a member of the Legal Department to discuss your concerns and obtain advice. Only the Legal Department can engage outside resources, and all outside legal expenses must run through the Legal Department budget.

OUR PEOPLE ARE KEY TO OUR SUCCESS

At WWT, we are committed to creating a safe, respectful, and responsible work environment that promotes high performance teamwork, and is free from harassment, discrimination, and threats. Please familiarize yourself with the Employee Handbook for your location, which outlines the specific workplace policies, programs, and benefits that apply to your location.

Human Rights & Fair Treatment

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. We ask that our suppliers and direct contractors demonstrate a serious commitment to the health and safety of their workers, and operate in compliance with human rights laws. WWT does not use or condone the use of slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working condition, and supports our products being free of conflict minerals.

We are committed to following all applicable wage and hour laws and regulations. Anyone paid based on hours worked must report and record all time worked accurately in accordance with established local procedure.

Diversity

Having a diverse workforce—made up of team members who bring a wide variety of skills, abilities, experiences, and perspectives—is essential to our success. We are committed to the principles of equal employment opportunity, inclusion, and respect. All employment-related decisions must be based on company needs, job requirements, and individual qualifications.

Always take full advantage of what our team members have to offer; listen and be inclusive.

Harassment

Our company is committed to providing a work environment free of all forms of harassment, including sexual harassment. If you believe you are being harassed, or if you have witnessed harassment of a colleague, you need to report this to your manager, another manager, or Human Resources. WWT will act promptly in investigating your concern and directly address the issue with the individuals involved. We recognize the sensitive nature of these claims and will work to ensure confidential treatment of the allegations to protect all involved. Of course, retaliation against any employee who reports suspected harassment will not be tolerated.

Discrimination

We do not tolerate discrimination against anyone—team members, customers, business partners, or other stakeholders—on the basis of race, color, religion, national origin, sex (including pregnancy), age, disability, HIV status, sexual orientation, gender identity, marital status, past or present military service, or any other status protected by the laws or regulations in the locations where we operate.

We comply with immigration laws and provide equal employment opportunity to everyone who is legally authorized to work in the applicable country. We provide reasonable accommodations to individuals with disabilities and remove any artificial barriers to success. Report suspected discrimination right away and never retaliate against anyone who raises a good faith belief that unlawful discrimination has occurred.



QUESTION: Sometimes my manager favors certain employees with overtime and good job assignments. I think I am being discriminated against. What should I do?

ANSWER: You need to discuss this with your manager. Tell your manager that you feel you are not being treated fairly in terms of job assignments and overtime. Give him or her specific examples. If your manager is unresponsive or if you have any fear of retaliation, contact your Human Resources Department or the WWT Ethics and Compliance Helpline.

QUESTION: A colleague of mine is upset and tells me that a co-worker is constantly telling off-color jokes directed toward ethnicities or about sexual orientation. She is afraid to speak up. What should she do?

ANSWER: Jokes or slurs directed against certain groups of people because of their race, creed, ethnicity, or background (including their accent), as well as sexually oriented, suggestive, or obscene comments, whether written or spoken, are not acceptable in our workplace and, in some cases, may be considered harassment. Your colleague should tell her co-worker that these jokes are offensive to her and ask the co-worker to stop or she will report the behavior. If your co-worker does not act, then you should report what your colleague has told you, even if you don't have all the facts or haven't observed the behavior yourself. You can report the incidents to your supervisor, your Human Resources representation, the Legal Department, or the Ethics and Compliance Helpline.

Workplace Safety, Substance Abuse & Violence Prevention

All managers have responsibility for ensuring proper safety and health conditions for their employees. To support this commitment, employees must:

- Observe all safety and health rules, practices, and laws that apply to their jobs
- Take precautions necessary to protect themselves, their co-workers, and visitors
- Immediately report accidents, injuries, occupational illnesses, and unsafe practices or conditions to their supervisor
- Maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances shall not be used in a manner that impairs your ability to perform your job



Threats, acts of violence, and physical intimidation are strictly prohibited. Possession of weapons on the job or on WWT premises is prohibited. No talk of violence or joking about violence will be tolerated.

Q&A

QUESTION: Two of my co-workers are constantly arguing with one another. They are both hotheads, and get easily irritated with one another over trivial matters. This morning, they had a particularly heated exchanged, and one of them shouted “You better watch yourself in the parking lot tonight!” I am not sure that either of them would actually cause the other physical harm. What should I do?

ANSWER: WWT takes any threats of violence seriously. Even though you are not sure that either of them would act on such a threat, you should still report the incident to your supervisor and WWT Security.

QUESTION: I think my boss has a drinking problem that is interfering with work in my area. What can I do? I really want to help.

ANSWER: You have an obligation to report your suspicions to your boss’s manager or to the Human Resources Department. It is crucial to employee and public safety that all WWT’s workplaces be entirely free of alcohol and prohibited drugs. By reporting your suspicions now, you not only fulfill your duty to our company, but you may also help your boss come to terms with a serious problem that could ultimately prove personally devastating to him or her.

WE ARE STEWARDS OF THE COMPANY'S ASSETS, INFORMATION, AND FINANCES

It is important that we protect our company's assets. Use our company resources only to conduct company business. Treat company assets with the same care you would if they were your own.

Assets & Resources

We want to ensure that our company's reputation is protected and that we minimize the potential for legal risk. All employees must protect our company assets, such as our electronic communication systems and resources, equipment, inventory, supplies, cash, and information. It is essential that company resources are protected, accessible for business purposes and operated in a cost-effective manner. Various portions of our campus have restricted access, such as our labs and some parts of our warehouses and integration centers; generally, only WWT personnel may have access to these areas. Non-WWT personnel must be cleared by security and escorted at all times when in these areas.

Use our company resources only to conduct company business, except where minimal personal use is allowed per our policies. When in doubt, ask your manager. No employee may commit theft, fraud or embezzlement, or misuse company property.



QUESTION: Can one of our OEMs send its engineers on-site to work on a proof of concept in our lab?

ANSWER: Yes, subject to our security screening procedures and appropriate non-disclosure agreements. Contact our security team to gather the information that will be needed prior to and on the day of their arrival. Also, if these individuals will be working in a restricted area, they must be escorted at all times while in those areas.

QUESTION: May I borrow a WWT vehicle over the weekend to transport some items that will not fit into my personal vehicle? I will pay for the gasoline.

ANSWER: No. WWT provides vehicles only for company business.

QUESTION: Someone stole my laptop. What should I do?

ANSWER: Immediately report the theft to the IT Global Service Desk and local law enforcement. WWT will need to assess whether personal or confidential customer data was on the laptop and whether it was encrypted. WWT tracks these incidents as part of our policy, and it is legally required to do so in many locations.

QUESTION: Can I bring software from home and load it on my office computer?

ANSWER: No. It is against company policy to install non-WWT licensed software on company-owned computer equipment. Any software used on company computers must be pre-approved for use by your computer services group and licensed by the company.

Proprietary & Confidential Information

All information related to WWT's business should be considered proprietary and confidential unless it has been released in authorized public documents. Handle company information with care, and avoid discussing confidential or competitive information with family, friends, or acquaintances. Be careful when in public, including social gatherings, elevators, restaurants, hotels, and airplanes, as well as online (e.g., chat-rooms, blogs, Facebook, Twitter, and other forms of social media). Consider your surroundings when talking on a cell phone in a public place. Remember, your obligation to keep WWT proprietary or competitive information confidential continues after your employment with WWT ends. It is never appropriate to photograph, copy, or otherwise disseminate WWT documents for personal gain.

If you need to send confidential information outside WWT, make certain there is a confidentiality agreement with the person receiving the information.

Examples of confidential information:

- **Undisclosed financial information**
- **New product offerings**
- **Proprietary or classified government information**
- **Personnel information or organizational changes**
- **Confidential technical data**
- **Marketing, pricing, or service strategies**
- **Business negotiation information**
- **Product costs and volumes**
- **Supplier and subcontractor information**

What If I Am Not Sure?

If you can answer "yes" to any of the questions below, the information is confidential and should be protected.

- **Is this information unknown to people outside the company?**
- **Would WWT be disadvantaged or harmed if others knew this information?**
- **Would your project be jeopardized if the information was not held in confidence?**



QUESTION: A former WWT employee who worked on my team recently contacted me to request that I provide copies of some materials we worked on during his employment. During this conversation, I learned that this former employee has copies of several binders and CDs with WWT materials and data we used in a project. I told this employee that I would get back to him. What should I do now?

ANSWER: You should not under any circumstances provide copies of the requested materials because they are likely to be WWT confidential information. The former employee may also have breached his obligations under the code by taking WWT confidential information, and there might be other issues for our company if this former employee has used or revealed this information to others. The obligation to maintain the security of confidential WWT information applies not just during your employment but also following your employment. Contact your manager immediately, and your manager in turn should alert your security representative and our company's Legal Department to determine what action our company should consider to protect its confidential information and property.

Protecting Customer/Third-party Confidential Information

WWT also has a duty to safeguard the confidential information shared with us by our customers, suppliers, and other business partners. We must also ensure that any third-party/customer information is used only for the reasons for which the information was gathered. Customer or third-party confidential information includes information about such party's business, products, plans, financial information, etc. We do not disclose any information about a third party without their written approval unless legally required to do so (for example, under a court-issued subpoena).

Obtain Competitive Information Fairly

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. Doing so helps us stay competitive in the marketplace; however, we must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. You may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or purchasing ownership rights to the information. When working with consultants, vendors, and other partners, ensure that they understand and follow WWT policy on gathering competitive information.



QUESTION: We hired a person who formerly worked for a competitor. She is aware of proprietary and confidential information about her former employer. Is it okay for her to share this information at WWT?

ANSWER: No. WWT policy prohibits disclosing proprietary, technical, and confidential business information about her former company. Even if it were accidentally disclosed, you cannot use the information. Simply stated, our company will treat proprietary and confidential information about other companies in the same way that we expect former WWT employees to treat our confidential information after leaving.

Maintain Accurate Financial Records/ Internal Accounting Controls

Leadership counts on us to use and provide accurate financial information so they can make good decisions. Be sure that any document you prepare or sign is correct and truthful.

Do not engage in any of the following activities:

- Maintain undisclosed or unrecorded funds or assets for any purpose
- Make, or ask others to make, false, misleading, or artificial entries on an expense report, time sheet, or any other document or report
- Give false quality or safety results
- Record false sales or recording sales outside of the time period they occurred
- Understate or overstate known liabilities and assets
- Delay the entry of items that should be current expenses
- Hide the true nature of any transaction
- Provide inaccurate or misleading information



QUESTION: I'm concerned about reporting a suspected fraud. What if I am wrong and it gets me in trouble, or I hurt someone's reputation?

ANSWER: We do not hold employees accountable for reports made in good faith, even if they turn out to be unfounded. We are careful when looking into alleged wrongdoing to ensure that employees' reputations are protected. Investigations are conducted in an objective, fair, and confidential way. We encourage you to talk to your manager first to help decide the best course of action.



Manage Records Properly

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. Records consist of all forms of information created or received by WWT, whether originals or copies, regardless of media. Examples of company records include paper documents, e-mails, and other electronic files that contain information about our company or our business activities.

- All records are the property of WWT
- Retain records in accordance with our Records Retention Policy
- Properly label and carefully handle confidential, sensitive, and proprietary information and secure it when not in use
- Do not destroy official company documents or records before the retention time expires; but do destroy documents when they no longer have useful business purpose
- Refer to your department's records retention schedule for more specific retention and destruction guidelines

WE SUPPORT COMMUNITY AND SUSTAINABLE BUSINESS PRACTICES

We share our success by supporting the communities in which we work and live.

Social Responsibility

We pride ourselves on being a company that gives back. We will continually challenge ourselves to define what being a responsible company means to us, and work to translate our definition into behavior and improvements at WWT. We seek to align our social and environmental efforts with our business goals and continue to develop both qualitative and quantitative metrics to assess our progress.

Charitable Contributions

We support community development throughout the world. WWT employees may contribute to these efforts, or may choose to contribute to organizations of their own choice. However, as with political activities, you may not use company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by our company. You should consult the Legal Department or the Helpline if you have questions about permissible use of company resources.



QUESTION: I volunteer for a local community organization that helps needy children. May I copy the organization's fund-raising brochure?

ANSWER: We encourage all employees to participate in volunteer activities. WWT equipment, however, should not be used for charitable or other non-business purposes without prior approval of your supervisor.

Human Rights

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Our company will only engage suppliers and direct contractors who demonstrate a serious commitment to the health and safety of their workers, and operate in compliance with human rights laws. WWT does not use or condone the use of slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working conditions, and supports our products being free of conflict minerals.

Communicating with External Parties

WWT employees are not authorized to speak with the media, investors, and analysts on behalf of our company unless authorized by our Marketing Department. Unless authorized, do not give the impression that you are speaking on behalf of WWT in any communication that may become public. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards.



Environmental Stewardship

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that WWT business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

Political Activities & Contributions

We encourage all employees to vote and be active members in political processes. Our rules in this area are:

- **WWT funds may not be donated to any political party, candidate, or campaign unless approved by the Legal Department**
- **WWT property or work time may not be used to assist any political party, candidate, or campaign**
- **Employees may not be reimbursed for personal political activity**

In the United States, laws do not allow the use of any corporate funds or resources for federal elections. Similar laws exist in many individual states. Although United States election laws allow companies to create and support political action committees, our company does not sponsor such committees.

While WWT may, from time to time, wish to express our view to governments on subjects that might affect the welfare of our company, communications on issues or matters of policy to government employees and officials can subject WWT and the employees engaged in such activities to applicable lobbying laws. For that reason, no lobbying activities should be undertaken, directly or through a third party, without first consulting the Legal Department. Our General Counsel must approve all participation or uses of funds for these purposes.



Q&A

QUESTION: May I make personal political contributions?

ANSWER: Yes. Personal political contributions are not prohibited. This is entirely a matter of personal choice.

QUESTION: I strongly support a candidate for office in the upcoming election. May I hand out campaign literature on the job?

ANSWER: No. Distribution of such materials during work time or in work areas is an unacceptable use of company property and time and could create the mistaken impression that WWT is endorsing a particular candidate.

QUESTION: May I speak at a political rally being held outside of business hours?

ANSWER: Yes. However, you should make it clear to the event sponsors that you are not representing WWT. Also, you should not wear a WWT uniform or any item with the WWT name on it. Your audience at the rally must not be led to believe that WWT is endorsing a particular candidate or political view.

Resources

[CORPORATE COMPLIANCE](#)

[CORPORATE SECURITY](#)

[CORPORATE SOCIAL RESPONSIBILITY POLICIES & RESOURCES](#)

[CORPORATE SOCIAL RESPONSIBILITY WEBPAGE](#)

[ETHICS & COMPLIANCE HELPLINE](#)

1-877-778-5463 or use the [REPORTIT WEBSITE](#)

username: WWT password: helpline

[EMPLOYEE HANDBOOK](#)

[HUMAN RESOURCES](#)

[LEGAL & COMPLIANCE DEPARTMENT](#)

[WWT POLICIES](#)



Thank you for taking the time to carefully read the Code. We are relying on you to make sound business decisions and to ensure that the principles established in the Code become a part of your everyday business life. While the Code serves as a reference point, always remember that you can consult with leadership when you need additional guidance. My door is always open; don't hesitate to reach out to voice any questions, comments, or concerns.

Erika Schenk
GENERAL COUNSEL & VP OF COMPLIANCE