

Unisys Business Partner Code of Conduct



Comply With Applicable Laws, Rules, Regulations and Unisys Policies.

As a Unisys business partner, you must comply with all applicable laws, rules and regulations in every country, state or locality where you do business. You must not commit an act in violation of applicable laws or this Unisys Business Partner Code of Conduct, or directly or indirectly instruct, encourage or facilitate others to do so, for any reason.

Bribery is Prohibited.

Unisys business partners must use only lawful and ethical practices in business dealings. Unisys business partners must not make or offer bribes, kickbacks, payoffs or any other form of improper payments. Unisys business partners must comply with all anti-bribery laws, including the U. S. Foreign Corrupt Practices Act (the FCPA), the U.K. Bribery Act, and any other anti-bribery laws in the jurisdictions where you do business.

In accordance with anti-bribery laws, Unisys business partners must not directly or indirectly give, offer, or promise an improper payment to others for the purpose of obtaining an improper business advantage or to influence any person inappropriately. Improper payments can include, among other things, providing excessive or frequent business

courtesies (such as meals, entertainment and gifts), making charitable donations, paying travel expenses or making facilitating payments. Unisys business partners are prohibited from directly or indirectly making improper payments to both public sector and commercial sector customers, public officials, and prospective customers.

Providing Gifts, Entertainment and Other Business Courtesies.

While exchanging business courtesies for the purpose of creating good will and promoting sound business relationships is a common and accepted practice, it is important that it be done in a careful and measured way.

Business courtesies should be reasonable in amount, appropriate, infrequent, and in accordance with customary and accepted business practices and with applicable laws, regulations and policies. Careful attention should be given to the frequency of business courtesies given to the same individual to avoid the appearance of impropriety. Many public sector customers prohibit their employees from accepting any business courtesies or severely limit what can be accepted. Private sector customers also may have internal guidelines restricting employees' acceptance of business courtesies. Unisys business partners must be mindful of applicable customer restrictions.

Protect Confidential Information.

Unisys confidential information.

Unisys business partners should take appropriate steps to ensure that any Unisys confidential information is safeguarded against unauthorized access, use or disclosure.

Confidential information of others.

Just as we endeavor to protect our information, other companies do so as well. In undertaking joint business activities with Unisys, Unisys business partners may not solicit, receive or use any confidential information belonging to others without proper authorization. Confidential information of others, rightfully received, should be handled with at least the same degree of care to avoid loss, misuse or unauthorized disclosure of such information as is applied to Unisys business partner's confidential information of a similar kind.

Privacy protection of personal data.

Personal data is any information that can be used directly or indirectly to identify a specific individual (including without limitation, information such as an individual's name, address, phone number, E-mail address, employee number, Social Security number, national identifier or credit card number). Unisys business partners are required to be responsible for understanding what personal data they are handling and ensuring that such handling complies with applicable law, contractual agreements and the Unisys Privacy Statement, www.unisys.com/unisys-legal/privacy

Avoid Conflicts of Interest.

Unisys business partners must avoid relationships, arrangements, investments or situations in which there is an actual or potential conflict of interest between the Unisys business partner's commitments to Unisys and its other business interests. If such conflicts or potential conflicts cannot be avoided, the Unisys business partner must promptly disclose the nature and scope of the conflict or potential conflict to Unisys. The existence of conflicts of interest may necessitate a termination of the business relationship.

Maintain Accurate Books and Records.

All payments and other transactions related to the business relationship between Unisys and the Unisys business partner must be properly authorized and be timely and accurately recorded in accordance with generally accepted accounting principles and established accounting policies.

Deal Honestly and Fairly With Others.

Unisys business partners must deal honestly and fairly with Unisys and its customers, partners, and suppliers.

Human Rights.

Basic human rights should always be respected. Therefore, all forms of slavery, human trafficking, forced labor, and child labor as defined by applicable law are prohibited by a Unisys business partner or a third party working on behalf of a Unisys business partner.

Charging of Costs/timecard Reporting.

Unisys business partners working with government or public sector customers must use special care to ensure that hours worked and costs incurred are accurately recorded and applied to the contract or project for which they were incurred. No cost may be billed to a contract with any government or governmental entity if the cost is not allowed by law or the terms of the contract.

Responsibility to Promptly Report Potential or Suspected Violations.

Unisys business partners have a responsibility to report promptly any suspected, potential or actual violation of this Unisys Business Partner Code of Conduct that could affect the business relationship with Unisys to the Unisys Corporate Compliance Office. The issue should be reported even if you believe the issue may have been resolved or if you are not sure whether it constitutes a violation. You may contact the Corporate Compliance Office on a confidential basis without fear of retaliation.

Contacting the Compliance Office

Web portal: www.UnisysCompliance.com

Mail Address: Compliance Office

Unisys Corporation

801 Lakeview Drive, Suite 100

Blue Bell, PA 19422

Compliance Helpline:

Country	Toll-Free Number	Country	Toll-Free Number
United States	800.732.3247	Italy	00.800.1777.9999
Argentina	0.800.333.0095	Japan	001.800.1777.9999
Australia	1.800.742.589	Luxembourg	00.800.1777.9999
Belgium	0800.260.39	Malaysia	00.800.1777.9999
Brazil	0800.761.1420	Mexico	001.866.376.0139
Canada	1.800.461.9330	Netherlands	00.800.1777.9999
Chile	1230.020.3559	New Zealand	0800.002341
China	00.400.120.3062	Norway	00.800.1777.9999
Colombia	01.800.518.2014	Philippines	00.800.1777.9999
Costa Rica	506.4000.3876	Poland	00.800.141.0213
Czech Republic	800.701.383	Singapore	800.852.3912
Denmark	00.800.1777.9999	Spain	00.800.1777.9999
Finland	990.800.1777.9999	Sweden	00.800.1777.9999
France	00.800.1777.9999	Switzerland	00.800.1777.9999
Germany	00.800.1777.9999	Taiwan	00.800.1777.9999
Hong Kong	001.800.1777.9999	United Kingdom	0.800.085.2896
Hungary	00.800.1777.9999	Venezuela	0800.102.9423
India	000.800.440.7022	Venezuela (Caracas)	+58.212.7820.2174
Ireland	00.800.1777.9999		