

*PATHWAY TO SUCCESS*

# Code of Ethics

And Business Conduct

# A letter from our CEO

Peter Altabef

Integrity is at the heart of Unisys. It informs everything we do: every decision, every action and every relationship. Our commitment to integrity is absolute. It cannot be sacrificed for short-term gains, nor can it bow to pressure from colleagues or business partners.

While we count on every associate to behave with integrity, we also understand that in some cases the correct decision is not immediately apparent. That is why we provide this Code of Ethics and Business Conduct. It details the key principles that guide our business activity and enable you to make the right ethical decisions.

We do not tolerate harassment or discrimination of any kind.

Our Code applies to everyone at Unisys, and all of us must familiarize ourselves with it. Speak up if you are unclear about a decision you need to make or a concern you have about suspected violations. Our support for a speak-up culture is unwavering. We have zero tolerance for retribution against those who come forward. We build a creative, safe and committed community that values diversity, equity and inclusion.

In a way, our Code is an extension of our culture of "let me help." It helps us make consistently ethical decisions and hold ourselves and each other accountable for doing so.

Nothing is more important than our reputation for integrity. Our shared commitment to act ethically and maintain that reputation is our strength and one of our greatest assets.



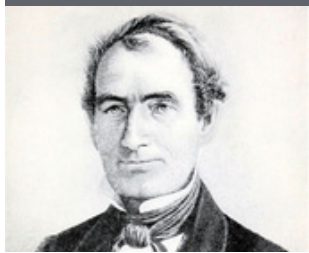
**Peter Altabef**  
Chair and Chief Executive Officer

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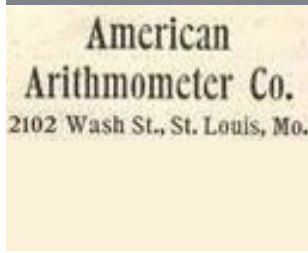
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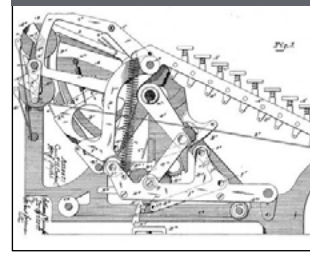
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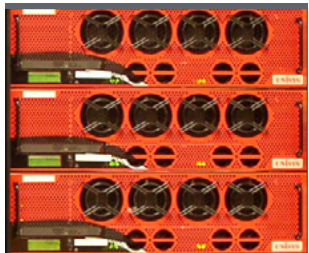
1986



2001



2006



2017



2020



Next...

You are part of writing the next chapter in the **Unisys story**. What will that be?

# OUR Values and Heritage

Unisys has a rich history of game-changing innovation that enhances people's lives. We were there at the beginning – the creation of the UNIVAC, one of the world's first computers. We bring technological innovation to businesses and governments around the world, delivering better outcomes – securely – for our clients, their customers and the communities we all serve. What drives us to excel with such passion and purpose?

It is simple: our Core Beliefs.

**Curiosity:** We encourage growth through continuous learning

**Creativity:** We look past routine ways of doing things

**Client-Centricity:** Our clients' success is our success

**Integrity:** We act ethically and honestly

**Inclusivity:** We embrace diversity, equity and belonging

# MICHELLE JONES

Vice President, Deputy General Counsel, Global Head of Litigation & Chief Compliance Officer

Our Code sets out our fundamental principles across a wide range of risk areas, why they are important and what is expected from all of us to manage those risks. Although we follow local laws or regulations when they set a higher standard than our Code, you should consider this document the first step on a pathway that begins with asking the right question and finding the right answer to guide your business decisions and actions.

In each section, look for the pathways with links to more guidance: related policies, frequently asked questions and other resources.



The Ethics & Compliance Office is also at your disposal, whether you contact us directly or via the Helpline. You will find contact details at the end of this Code, or via the Helpline icon on the tool bar.



Leaders, you will find additional expectations associated with your elevated responsibilities in the organization. Ethical leadership is a key contributor to an ethical culture; we cannot do it without your active involvement. Look for the blue boxes and this symbol for more information:



Speak up – ask questions – get answers – take the right course of action.



**Michelle Jones**  
Vice President, Deputy General Counsel,  
Global Head of Litigation  
& Chief Compliance Officer



# Integrity Is in Our Code

*We are **honest** in all our dealings  
and stand for what is right.*

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# EVERY ASSOCIATE'S Responsibility

Compliance. Ethics. Integrity. These are all just words unless every associate at Unisys owns and accepts accountability for them. As a Unisys associate, you are expected to comply with our Code, with Unisys policies and procedures and with the law.

## Associates must:

- Read, understand and pledge to act in compliance with our Code and the policies, laws and regulations that apply to your job.
- Speak up when you observe, learn about or suspect violations of our Code or related policies.
- Cooperate in any internal investigations.
- Complete all assigned mandatory training on compliance and ethics issues.



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## EVERY LEADER'S Responsibility

As a Unisys leader, you are held to an even higher standard, and you have a special responsibility to lead with integrity. You must model ethical behavior and take active measures to make certain your team does, too. If you communicate and listen to your team and handle concerns and different opinions with ethical compassion and understanding, you will build trust, promote productivity and protect the company.

Leaders are expected to understand the risks associated with their organization's business activities and actively seek to mitigate them. These risks arise from the global nature of our business and include areas covered in our Code. Your comprehensive understanding will enable you and your team to take actions that minimize those risks and contribute to overall success.

### Leaders must:

- Identify the risks relevant to your work, regularly discuss them with your team and implement mitigation measures.
- Clearly communicate and demonstrate that efforts to win business must never be compromised by unethical or illegal actions, even if it means losing a business opportunity.
- Complete your compliance training on time, and make sure your team does, too.
- Be approachable – make sure your team knows that you will listen and that they can ask questions and raise concerns without fear of retaliation.
- Know how to identify and manage suspected misconduct – refer the matter to the Ethics & Compliance Office for investigation, and do not attempt to investigate or resolve the issue yourself.




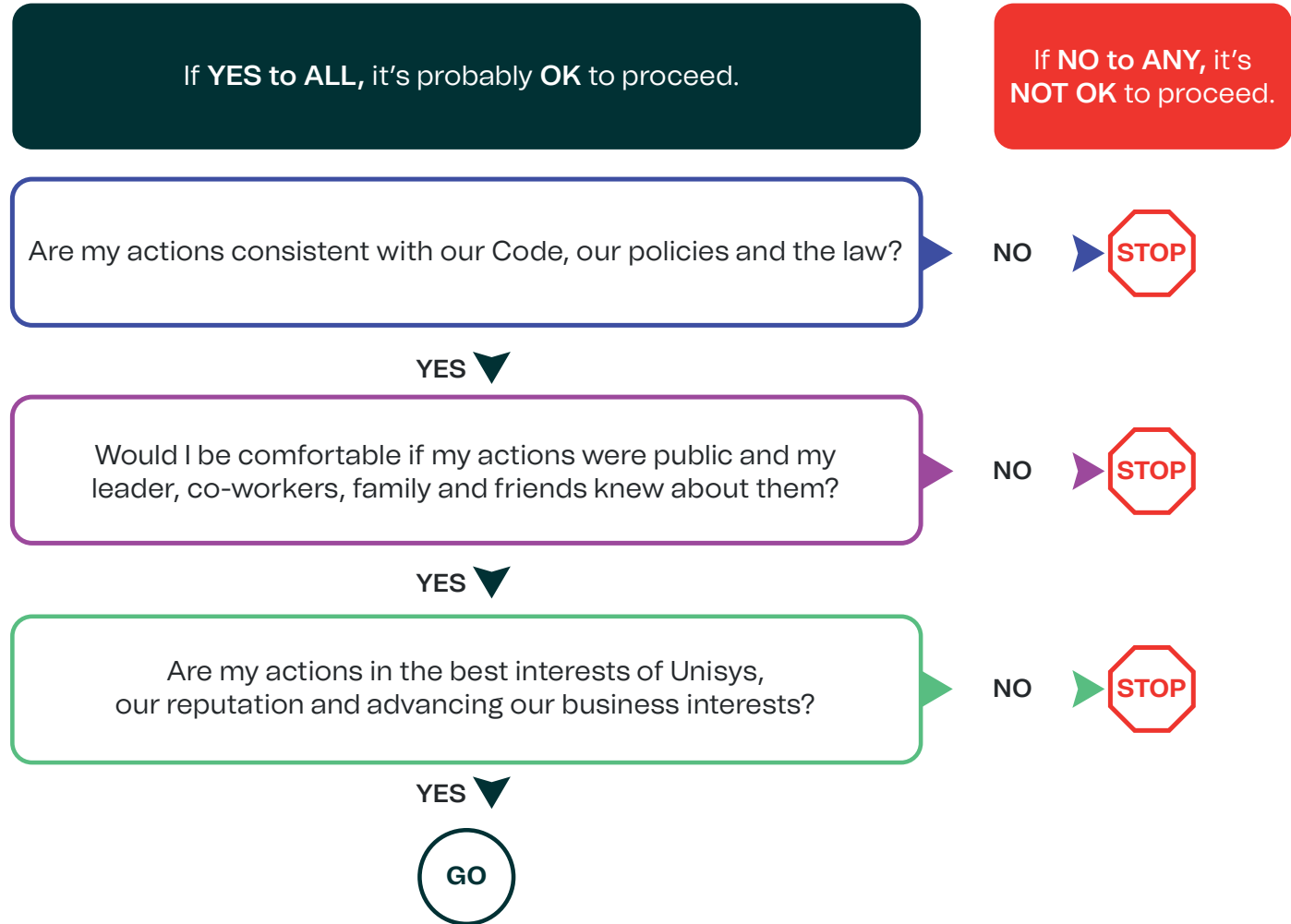
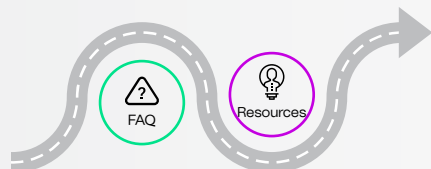


# MAKING Ethical Decisions

Creating a culture of integrity starts with making good decisions. Ask yourself these questions before taking actions that might compromise our Code and our commitment to conducting our business with integrity:

Making ethical decisions and good choices builds a culture of integrity and a place we all want to work. When we act with integrity, we build trust with each other, our clients and our business partners. When faced with an ethical dilemma or difficult decision, ask yourself the following questions. When in doubt, seek guidance.

 **Leaders must also seek guidance** from the Ethics & Compliance Office or the Legal Department when confronted with an ethical issue on their team.



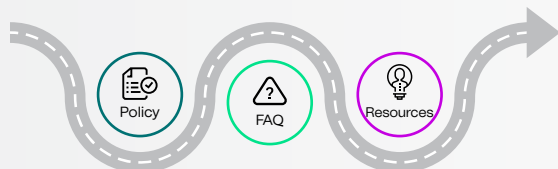
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## WORKING WITH Third Parties

If you regularly supervise, manage or interact with third parties, whether they are consultants, sub-contractors, suppliers, contracted and contingent workforce, or anyone working on our behalf, you should be familiar with our Business Partner Code of Conduct.

### Associates must:

- Ensure that third parties receive, acknowledge and follow the Business Partner Code of Conduct.
- Give third parties opportunities to ask questions and raise concerns that help them stay in compliance with that Code, including using the Unisys Helpline.
- Report any suspected violations of our Business Partner Code of Conduct to the Ethics & Compliance Office.





# Integrity in our Workplace

*We VALUE one another  
by treating everyone with  
dignity and respect.*



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## DIVERSITY, EQUITY, INCLUSION AND A SAFE AND Respectful Workplace

We foster a business environment where we value diverse perspectives and treat our associates, clients and business partners with dignity and respect. We work better together because of our differences, not despite them. We hire, promote and discipline associates without regard to age, race, nationality, gender identity or expression, pregnancy, disability, sexual orientation, religion, veteran status, or other protected class. At the same time, we create opportunities for underrepresented populations.

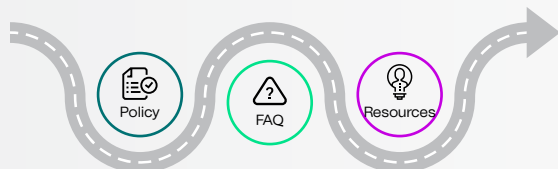
Unisys maintains a respectful, safe and healthy work environment so we can all be productive, creative and successful. Each of us is responsible for ensuring our work environment is safe and free from discrimination, harassment and hostile behavior. Unsafe, offensive, unprofessional or inappropriate behavior has no place at Unisys.

### Associates must:

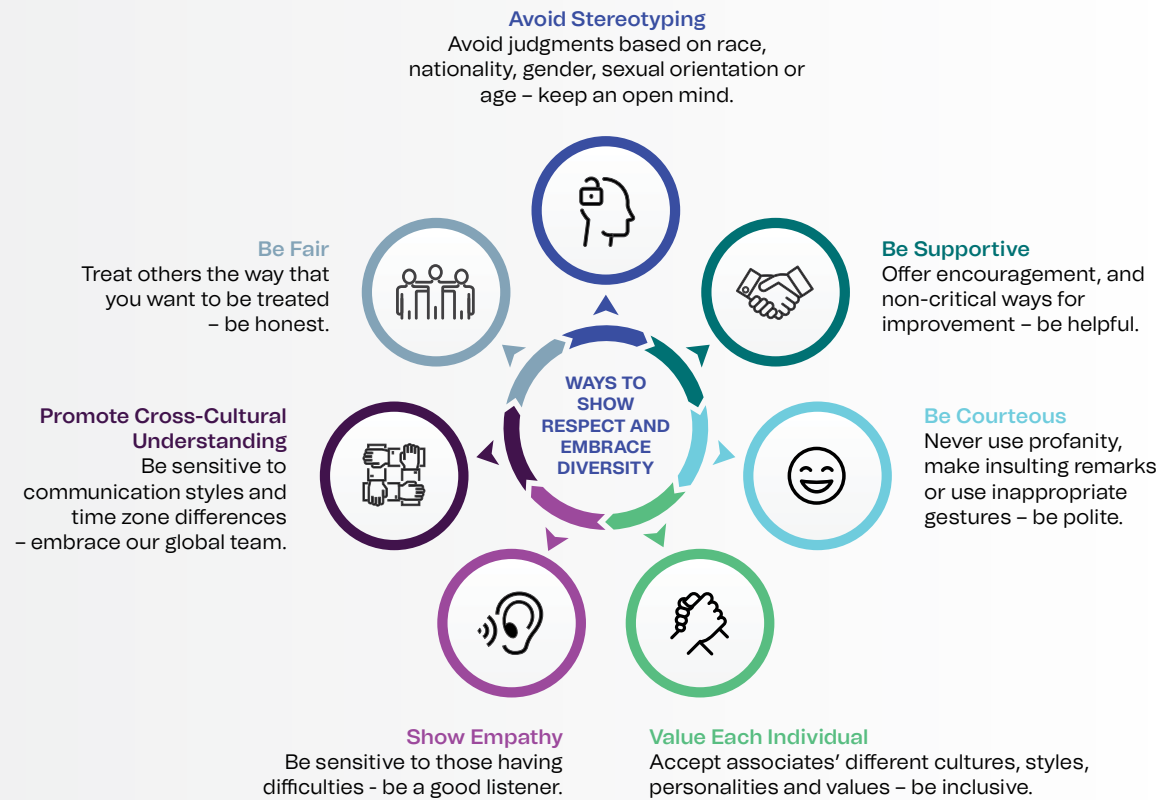
- Create and maintain a respectful workplace.
- Engage in active listening; foster open discussions and the free expression of ideas.
- Understand, examine and address explicit, implicit or unconscious biases which may lead to discriminatory behavior.
- Comply with workplace safety regulations, and report any accident or injury sustained on the job to your leader or Human Resources.
- Never work impaired by drugs or alcohol.













**Leaders must also** seek opportunities to create diverse teams, develop an inclusive work environment, and foster professional development equity.



# DIVERSITY, EQUITY, INCLUSION AND A SAFE AND Respectful Workplace



## What Harassment Looks Like

<p><b>Sexual Harassment</b></p> <p>Unwelcome touching, advances, obscene gestures.</p> 	<p><b>Harassment</b></p> <p>Assault or threats of violence.</p> 
<p>Sexually offensive remarks, conversation, jokes, whistling, repeated invitations for date despite refusals.</p> 	<p>Derogatory remarks, joking, teasing and commenting about sensitive and/or controversial subjects.</p> 
<p>Requests, threats or demands for sexual favors in exchange for continued employment or promotions.</p> 	<p>Requests, threats or demands in exchange for continued employment or promotions or to avoid negative consequence.</p> 
<p>Visual images that are sexual in nature.</p> 	<p>Visual images that are demeaning or discriminatory.</p> 
<p>Allocating more work, more difficult tasks or more shifts after a refusal of sexual advance.</p> 	<p>Allocating more work, more difficult tasks or more shifts and exclusion from meetings and team activities.</p> 



# Integrity in Our Business Dealings

*We are **ACCOUNTABLE** for  
our actions and **HONOR**  
our commitments.*



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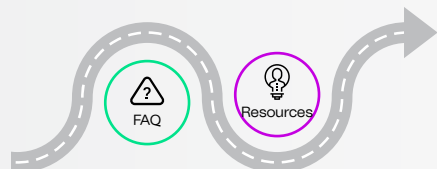
## COMPETE Fairly

Unisys competes in the world marketplace vigorously but fairly. We do not engage in unfair or anti-competitive behavior, nor do we make untruthful statements about our products and services or those of our competitors.

There are laws designed to promote competition in the marketplace. They provide a fair landscape for companies to compete, whether with each other or in the supply chain, and offer consumers a choice. These laws prohibit activities such as bid rigging, price fixing, dividing or allocating market segments or territories and any interaction with competitors that might be seen to limit competition. Even making informal arrangements or sharing information about our products and services with competitors can violate these laws.

### Associates must:

- Avoid any formal or informal agreements with competitors that may appear to limit competition.
- Respect competitive bidding processes and be transparent if there are conflicts or other issues that might be viewed as interference.
- Limit contact with our competitors, immediately end any discussions regarding pricing or other inappropriate matters and report incidents to the Legal Department.
- Avoid dictating the prices that our independent partners charge their customers.
- Source competitive intelligence appropriately, honestly and transparently. If you gain access to confidential information from a competitor, contact the Legal Department.





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## IMPROPER PAYMENTS AND BENEFITS, Bribery and Corruption

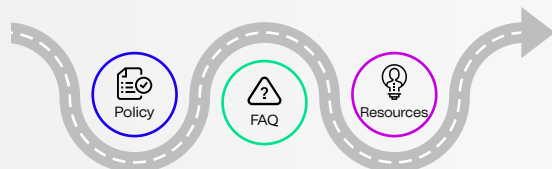
At Unisys, we are transparent in our interactions with our business partners, and we do not influence their decisions by offering or making bribes or improper payments, promises or other arrangements. In addition to betraying our commitment to conduct our business with integrity, these actions violate national and international laws and may be a serious criminal offense for companies and individuals.

Unisys strictly prohibits offering, promising or giving anything of value to a government official or to a business partner with the intent to keep or get business, influence a business decision or action, or for any other improper purpose. The third parties we engage are also prohibited from such activities; others cannot bribe on our behalf. We cannot make cash payments, promises of some future benefit or discounting or kickback arrangements, all of which may be considered a bribe or other corrupt action.

National and other laws define who are government officials. They may include employees or officers of government institutions, as well as employees of state-owned companies or public international organizations.

### Associates must:

- Be able to identify whether a business partner or other third party may be considered a government official.
- Work only with third parties, agents, consultants and advisors who have undergone due diligence and who include best practices in compensation and other contract terms.
- Offer a gift, hospitality or travel courtesy that is reasonable, and appropriate.
- Take actions such as making charitable donations, hiring employees or engaging third parties only during the normal course of business, not as part of an exchange for a favor.
- Accurately describe payments or expenses in our books and records.







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## OFFERING OR ACCEPTING Business Courtesies

Gifts, meals or other courtesies are an important part of developing goodwill, and they can play a role in enhancing business relationships. If they are or could be considered lavish or inappropriate, if they lack transparency or if they are unrelated to a legitimate business purpose, however, they may cause concern about corruption and even be characterized as bribes, which can lead to legal consequences for the individual and/or Unisys.

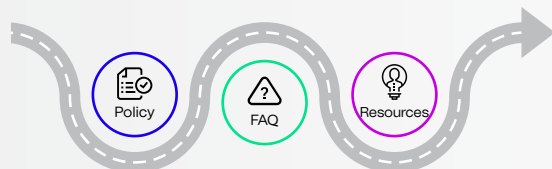
Exercising good judgment and moderation is critical for ensuring that business courtesies are appropriate and within established limits. Associates must make sure that they do not violate Unisys policies or those of the intended recipient's organization.

### Associates must:

- Check any restrictions in the organization of the intended recipient before offering a business courtesy.
- Learn and follow the limits set out in the country guidelines associated with the Business Courtesies & Avoiding Bribery policy, and follow the Business Courtesies & Avoiding Bribery policy.
- Obtain prior approvals where required, particularly before offering a business courtesy to a government official or any public sector client.
- Ensure a business courtesy is appropriate to the occasion and business relationship. Branded Unisys items are preferable to an unbranded gift.
- Keep track of and limit the cumulative value of business courtesies offered to a single individual over the course of the year.
- Politely refuse or return anything that violates our Code or policies.

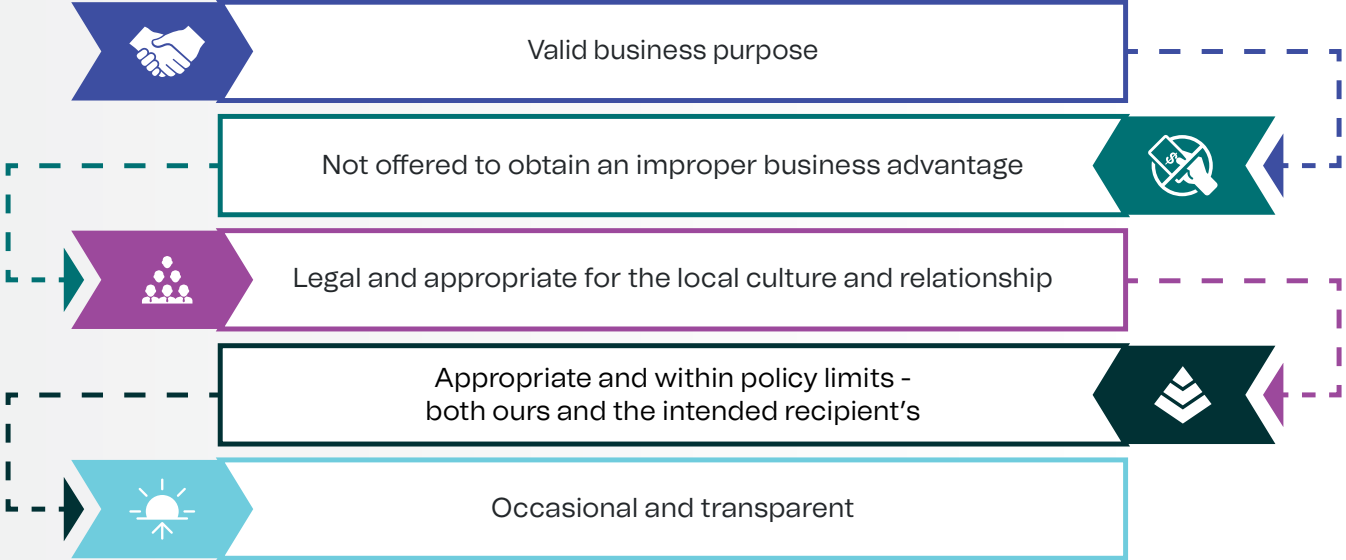


**Leaders must also** closely monitor the business courtesies expenses that you approve and ask questions when you are unsure whether an expense is within policy limits.



# NAVIGATING Business Courtesies

Exchanging business courtesies with our clients, partners and suppliers can build goodwill and strengthen relationships if done with respect. Follow these tips to respect the laws and the rules applicable for most companies.



**MAY I KEEP IT?** YES, you may accept gifts as long as they are not intended to influence your business judgment and they comply with our policy and guidelines. They must be of nominal value, appropriate and infrequent. You may never accept cash. You may accept reimbursement for lodging or travel expenses **ONLY** with approval from your leader and the Ethics & Compliance Office.



# CONFLICTS OF Interest

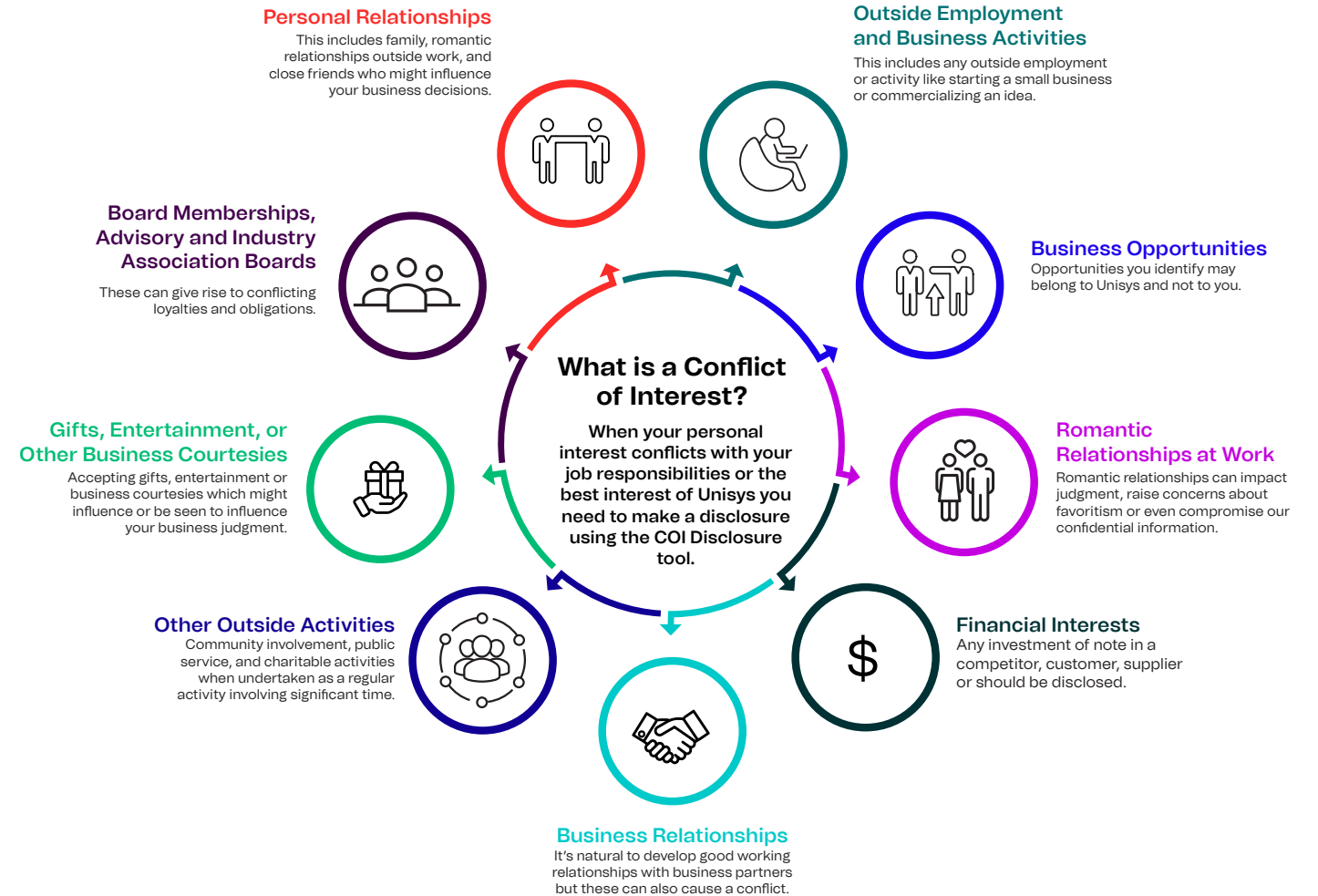
Sometimes our personal interests and the interests of Unisys can come into conflict. It is important that all associates avoid even the appearance of a conflict between their personal interests and Unisys' interests.

Potential conflict situations do arise and are not automatically evidence of wrongdoing. In most cases, when potential conflicts are disclosed promptly, they can be resolved with little or no further action. Associate disclosure allows us to navigate the situation together in a way that protects both the associate and the company, while being as transparent as possible about our business dealings.

**Associates must:**

- Be able to identify a conflict of interest as it arises.
- Avoid conflicts where possible.
- Promptly (and in advance, where possible) disclose a potential conflict to obtain clearance from the Ethics & Compliance Office and approval from your leader.
- Manage and follow any conditions related to a cleared conflict.

**Leaders must also** understand the criteria for approving a conflict of interest and monitor any cleared conflicts which may have an impact on performance.





# Integrity With Assets and Information

*We **SAFEGUARD** assets and  
information, whether belonging  
to Unisys or others.*



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## USE OF UNISYS

# Property and Resources

Unisys property and resources are intended to help associates achieve business objectives. Associates must protect and use company property and resources responsibly and honestly. Unisys does not tolerate careless, inefficient, fraudulent or illegal use of company property or resources, including budgeted funds and time.

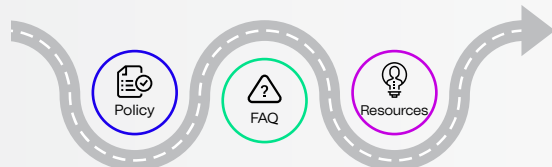
Company-provided devices and access to systems are for Unisys business only and should never be used for illegal activities, gambling, viewing or sending obscene, hateful or disrespectful material or images, or uploading or downloading software that is copyright protected or subject to export controls.

**Associates must:**

- Spend Unisys funds wisely, as if they were your own, guard against waste and abuse.
- Be honest and accurate in your time and expense reporting.
- Be alert to situations or incidents that could lead to the loss, misuse or theft of company resources or property.
- Use Unisys resources, like company computer equipment, phones and internet systems, only for legitimate Unisys business activities.



Leaders must also be accountable for their team's proper management and use of company assets and should carefully review expense reports, asset allocation and management.



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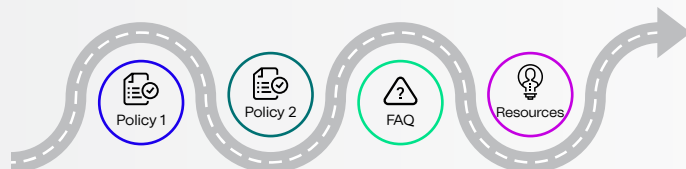
# Confidential Information

## And Intellectual Property

Unisys information, trade secrets and intellectual property are valuable assets that demand protection. We could lose our competitive advantage if our confidential information is disclosed outside of the company. We must also respect the confidential information and intellectual property of others. This includes protecting information our business partners share with us. Safeguarding information and ideas, whether our own or those of others, is crucial to our business success and our reputation as a trusted partner.

### Associates must:

- Never discuss confidential information in public spaces and share it only with those who are authorized or need to know it.
- Use confidential information only for Unisys business, and maintain confidentiality even when your employment with Unisys ends.
- Secure Unisys intellectual property rights through copyrights, trademarks and other forms of intellectual property to protect the value of our innovation.
- Protect confidential information by using correct classification, encryption and other methods.
- Do not solicit or use the confidential information or intellectual property of others without license or permission.



# PERSONAL Data

The appropriate use and protection of personal data is critical to Unisys, whether the data belongs to our associates or is entrusted to us by our clients, business partners and other third parties. Maintaining the integrity and confidentiality of personal data that we collect, process, store and transfer is how we build and maintain the trust that is essential to the way we conduct our business activities.

We operate using established principles to embed “privacy by design” into our operations, products and services.

**Associates must:**

- Identify the information in your business activities that is considered personal data, learn the requirements for its use or management and allow access only to those who need to know.
- Provide clear and accurate privacy notices when collecting or processing personal data.
- Collect, use and share only the data that is needed for a specified business purpose.
- Apply appropriate records management rules for the storage and destruction of the data.
- Incorporate privacy considerations in the design or planning of any solution or project.



**Leaders must also** collaborate with the Privacy Office to keep current on privacy developments related to their work and to identify areas that may require input or support.

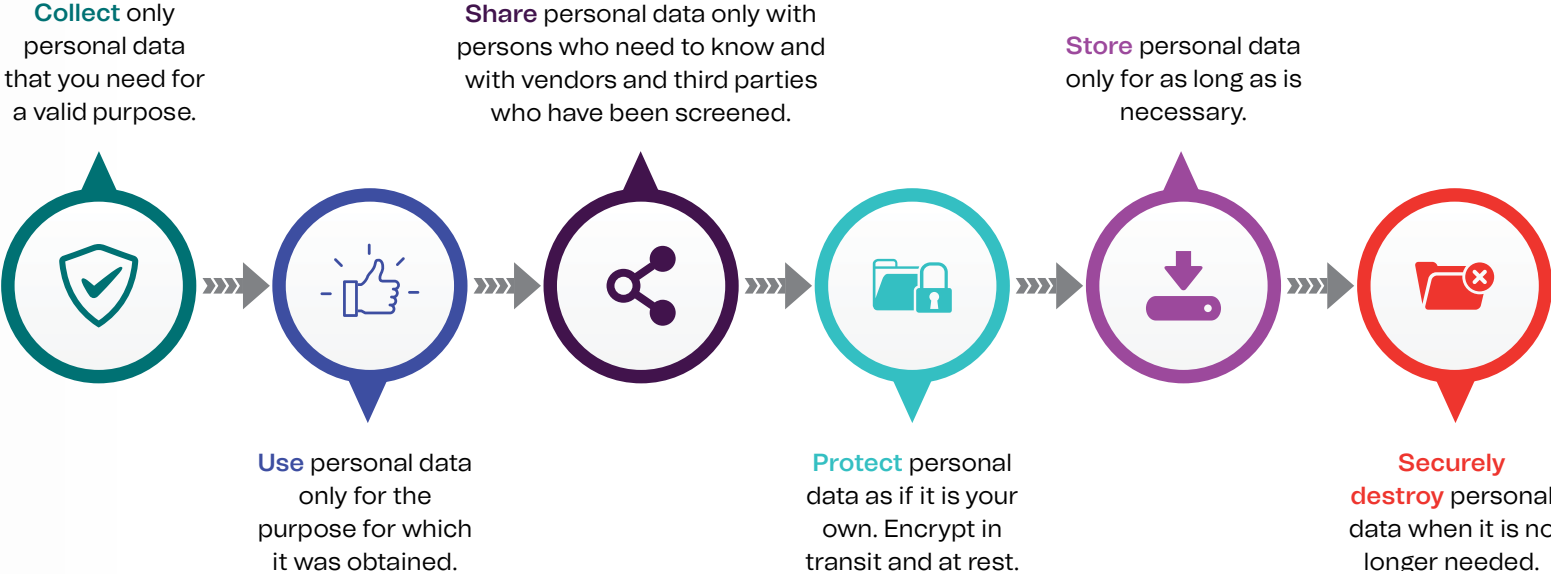


# DATA PRIVACY Principles

While the global regulatory environment for data privacy is constantly evolving, there are some fundamental principles that apply regardless.

You have a responsibility to protect the personal data of our clients and associates. Our clients take privacy very seriously, and so does Unisys.

Follow these data principles:





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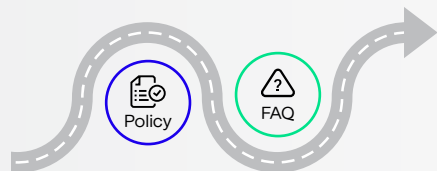
## RECORDS

# Management

Unisys records, including any written, printed or electronic data, are a valuable company resource, whether they are structured or unstructured. Unisys records must be managed and controlled throughout their life cycle according to our policies, procedures and retention schedules. Records created or collected by Unisys associates are Unisys property and should be respected and managed accordingly.

**Associates must:**

- Keep records only as long as needed for business purposes, and then destroy or archive them according to our policy.
- Safeguard confidential information, marking it appropriately and encrypting or storing it securely when necessary.
- Preserve records that are subject to a “legal hold” or part of an investigation.
- Take responsibility and review the records that you create on a regular basis to ensure compliance.



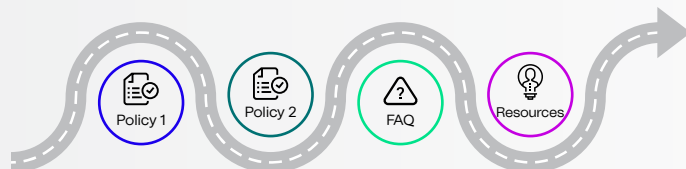
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## ACCURATE FINANCIAL, COSTS AND Timekeeping Records

We maintain policies and procedures that help ensure the accuracy of our financial reporting and honor our commitment to stakeholders. Accurate and complete records are the foundation of the Unisys financial reporting and controls process.

### Associates must:

- Ensure that Unisys payments and transactions are properly approved and recorded on Unisys books.
- Comply with applicable accounting requirements in each country where Unisys does business.
- Ensure that your time records are current, that they reflect the hours that you worked and that the time is charged to the correct code.
- Accurately and honestly charge costs, including in your expense statements.
- File accurate and timely financial disclosures and reports to the U.S. Securities and Exchange Commission and other national and international regulators.





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# INFORMATION Security

As a company that provides security solutions to our clients, security is part of our DNA. Everyone has a responsibility to protect Unisys data and that of our clients. Remember that we are all responsible for cybersecurity, and we are all obligated to maintain information security by observing the relevant laws and Unisys Information Security Policies.

**Associates must:**

- Protect and never share your password.
- Create and maintain complex passwords.
- Identify phishing and social engineering attempts, and immediately report suspicious activity to Information Security.
- Safeguard Unisys or client data and not store it on personal or removable devices.



A woman with long dark hair, wearing a bright yellow polo shirt, is looking down at a tablet computer she is holding. The background is a blurred cityscape with modern buildings, including a prominent curved glass building and a tall, thin skyscraper. The lighting suggests it's daytime.

# Integrity With Society and Governments

*We Conduct Our Business as Responsible Citizens in Accordance With the Laws and Regulations Everywhere We Operate.*

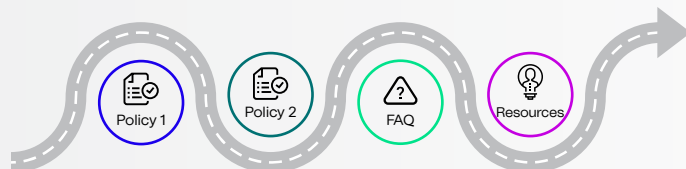
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## INTERACTIONS WITH THE PUBLIC SECTOR AND Government Officials

We have special obligations to comply with laws and regulations when we are conducting our business with public sector clients and government officials. These obligations also apply to lobbyists, consultants and other third parties who represent Unisys in the public sector.

### Associates must:

- Obtain approval from Government Relations and the Legal Department before hiring a lobbyist, consultant or other third party or joining a trade group that engages with the government.
- Consult with the Legal Department and Government Relations to understand any requirements associated with contracting with United States local, state or federal agencies or other government bodies globally.
- Ensure that any entertainment or business courtesies are in line with Unisys Business Courtesies and Antibribery policies.
- Consult with Human Resources and Government Relations before hiring a current or former government employee.
- Immediately contact the Legal Department if you receive a request for information from a government agency.





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# POLITICAL Activities

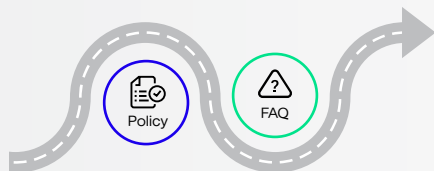
Unisys encourages personal participation in the political process in accordance with local, state, federal and international law. Personal activities, including making contributions, should never be represented as coming from Unisys or as reflecting Unisys sponsorship and must be done using your personal time and resources. Unisys does not allow political campaign or partisan political activities at any Unisys workplace or facility or on Unisys media channels. Violations could lead to loss of business, financial penalties and prosecution by state or federal entities.

**Associates must:**

- Contact Government Relations if you plan to run for office or actively assist a political campaign.
- Never use Unisys resources, including company computers, telephones or e-mail for political campaigning, fundraising or other political activities.



**Leaders must also** take care not to directly or indirectly pressure, or allow others to pressure, associates to support, contribute to or campaign for any candidate or party.



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## EXTERNAL COMMUNICATIONS AND Social Media

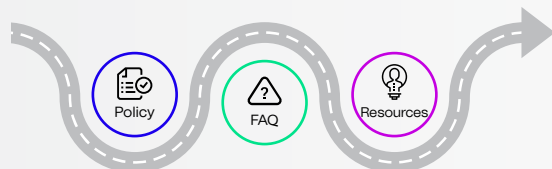
Our public statements, marketing materials and communications must be honest, accurate and transparent. Only designated associates are authorized to speak on behalf of Unisys with external parties like the media or analysts; others are prohibited from doing so without permission from Corporate Communications.

There are many communication channels, and social media is a key part of our Unisys culture in the ways we connect, network, collaborate and exchange knowledge, expertise and information. It is critical that we exercise good judgment, common sense and courtesy when using all social media platforms. All use of social media by associates must abide by our principles even when posting on personal accounts.

What and how we communicate has an impact on our well-earned reputation.

### Associates must:

- Never post items that might violate our Code and policies, including photos or information about our colleagues, posts that disclose confidential information, or messages that might be viewed as harassing or discriminatory.
- Never speak on the company's behalf on any topic unless you receive prior approval. Only authorized individuals can communicate the company's official position on certain topics such as financial performance, strategic business plans, legal matters and public policy issues.
- Remember that you represent Unisys, and consider how your communications support our business, our values and our brand.
- Make sure that any posts clearly indicate you are expressing your own views and not those of Unisys.



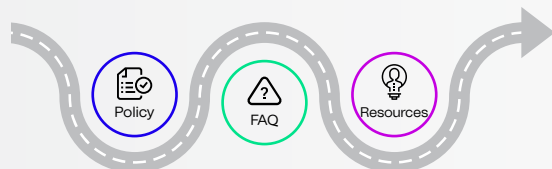
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## CHARITABLE Contributions

While Unisys encourages us to support our communities, any charitable contributions made by the company must be consistent with company practices.

### Associates must:

- Obtain necessary permissions from Human Resources and the Ethics & Compliance Office before making any contributions.
- Seek opportunities to take tax deductions for any contributions.
- Take measures necessary to ensure that contributions of hardware comply with Information Security requirements, such as certifying that information has been deleted and that software transfers are in line with licenses.





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## INSIDER Trading

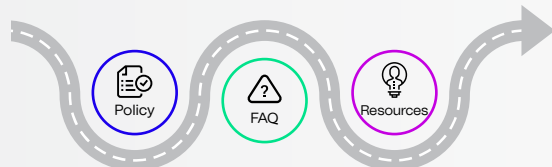
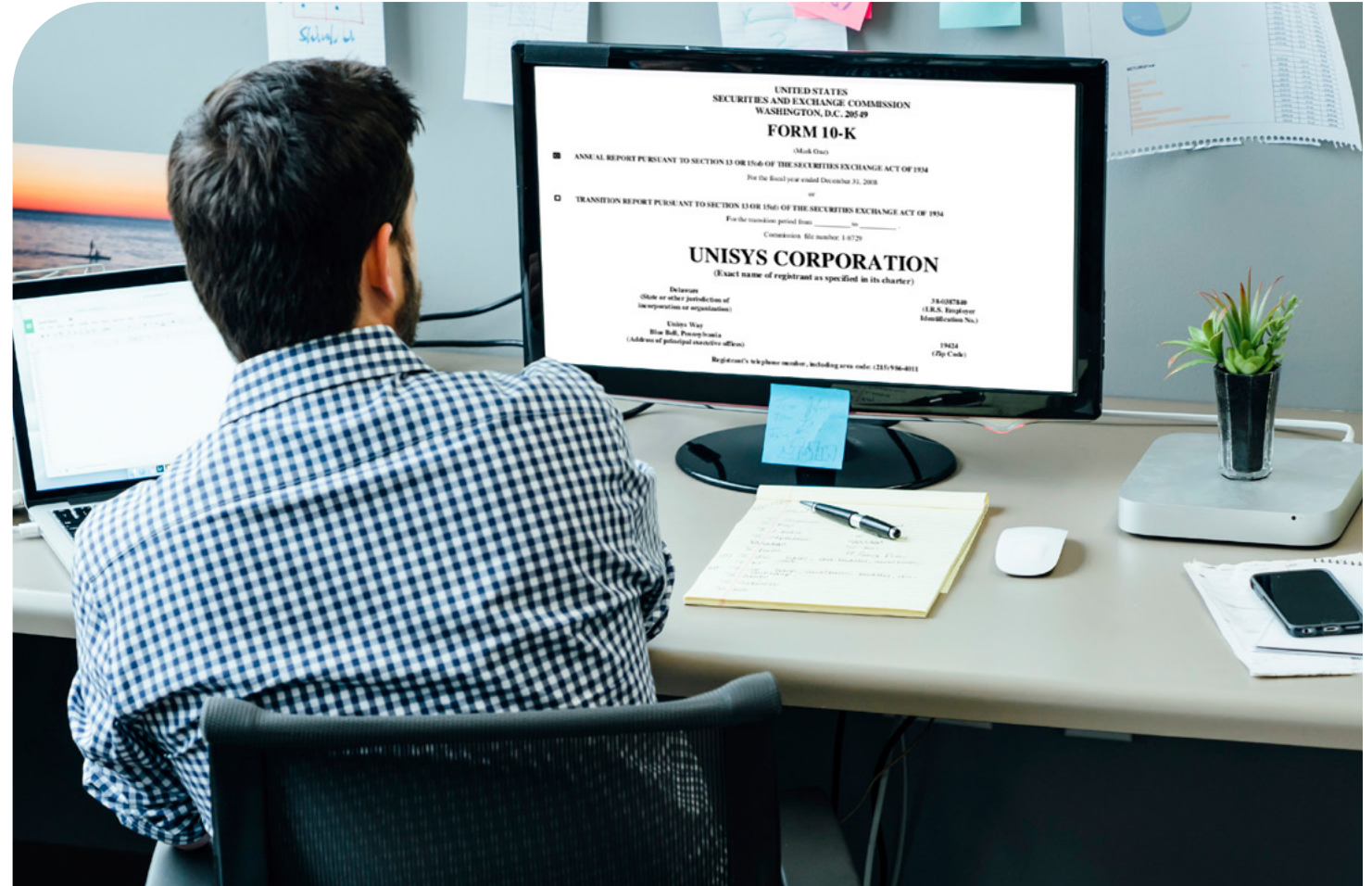
In your role, you may become aware of material, nonpublic information about Unisys or our business partners.

Information is material if a reasonable investor would consider it important in deciding whether to buy or sell a company's securities. Information is nonpublic if it has not been broadly communicated to the investing public.

It is illegal to trade in Unisys securities or the securities of another company based on material, nonpublic information.

### Associates must:

- Never buy or sell any securities based on material, nonpublic information.
- Never give someone else (for example, a friend, spouse or broker) a "tip" regarding material, nonpublic information, or recommend or suggest that anyone trade in material, nonpublic information.



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## CONFLICT MINERALS AND Human Rights

Unisys respects fundamental human rights. All forms of slavery, human trafficking, forced labor and child labor are prohibited within Unisys operations, and we make every effort to make certain they are not present in our supply chain.

We are committed to obtaining parts and supplies from businesses that share our values regarding human rights and ethical practices. We adhere to regulations regarding the use of conflict minerals and require the same from our suppliers.

### Associates must:

- Understand the human rights issues that might apply to your activities at Unisys.
- Expect our suppliers to be socially responsible and to comply with laws, regulations and standards related to employment, human trafficking, slavery and the use of conflict minerals.



# EXPORT CONTROLS AND Trade Sanctions

We comply with all laws that govern how our technology may be distributed and used internationally. Global trade controls, boycotts, embargoes and other sanctions limit or prohibit us from doing business with restricted entities, such as certain countries, governments and individuals. These rules dictate how we import or export goods, services, software and technologies. As a technology company, we must be particularly responsible with our products and services.

**Associates must:**

- Know about the various restrictions on exporting our technology and services to direct customers and end users.
- Collaborate with the Export Controls group to obtain any required authorization or license.

 **Leaders must also** conduct appropriate due diligence on business partners and understand the full structure of any deals involving exported technology.



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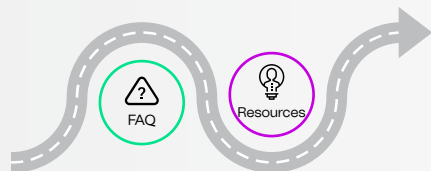
ANTI-MONEY

# Laundrying

Unisys complies with anti-money laundering laws to prevent third parties from attempting to conceal the source of illicit funds. We have procedures and conduct due diligence to avoid receiving funds which may be the proceeds of criminal activity.

**Associates must:**

- Follow onboarding procedures when working with a new business partner.
- Alert the Finance Department to any suspicious transactions or unusual requests from third parties regarding payment structures.



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# Environment

We incorporate sustainability into every aspect of what we do, which strengthens our ability to better serve our clients, our associates, our surrounding communities and the environment. We strive to operate our business in a manner that mitigates the potential for adverse environmental impact, promotes the conservation of energy and resources, reduces waste and meets or exceeds governmental environmental requirements.

## Associates must:

- Work with our operations group to meet or exceed governmental environmental requirements.
- Utilize our recycling program to recycle office waste and ensure safe disposal of electronics.
- Seek opportunities to conserve energy and resources and engage in actions that promote sustainability.





# Compliance with Our Code

*Our company **CULTURE**  
depends on following  
Our Code, asking questions  
and raising concerns.*

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## CONDUCTING OUR BUSINESS with Integrity

Our Code does not contain everything you will need to know about conducting our business with integrity and a clear commitment to complying with our policies and the law. You must exercise good judgment, seek further guidance from our available resources, ask questions and, where something does not look or feel right, raise concerns.





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# Speaking Up

We all have a responsibility to speak up if we have an ethics concern or suspect that someone we work with, work for or contract with is violating our policies, behaving illegally or acting unethically. We should speak up even if we believe that the issue has been resolved. If you are in doubt, ask for guidance.

## NO RETALIATION

Unisys does not tolerate retaliation. It can be uncomfortable to act with integrity, and speaking up can take courage. That is why we do not tolerate retaliation for reports made in good faith. Anyone who retaliates against an associate for reporting concerns or participating in an investigation will be subject to disciplinary action, up to and including termination.

If you experience retaliation, or you know of someone else being subject to retaliation, you should speak up and report your concerns to the Ethics & Compliance Office immediately.





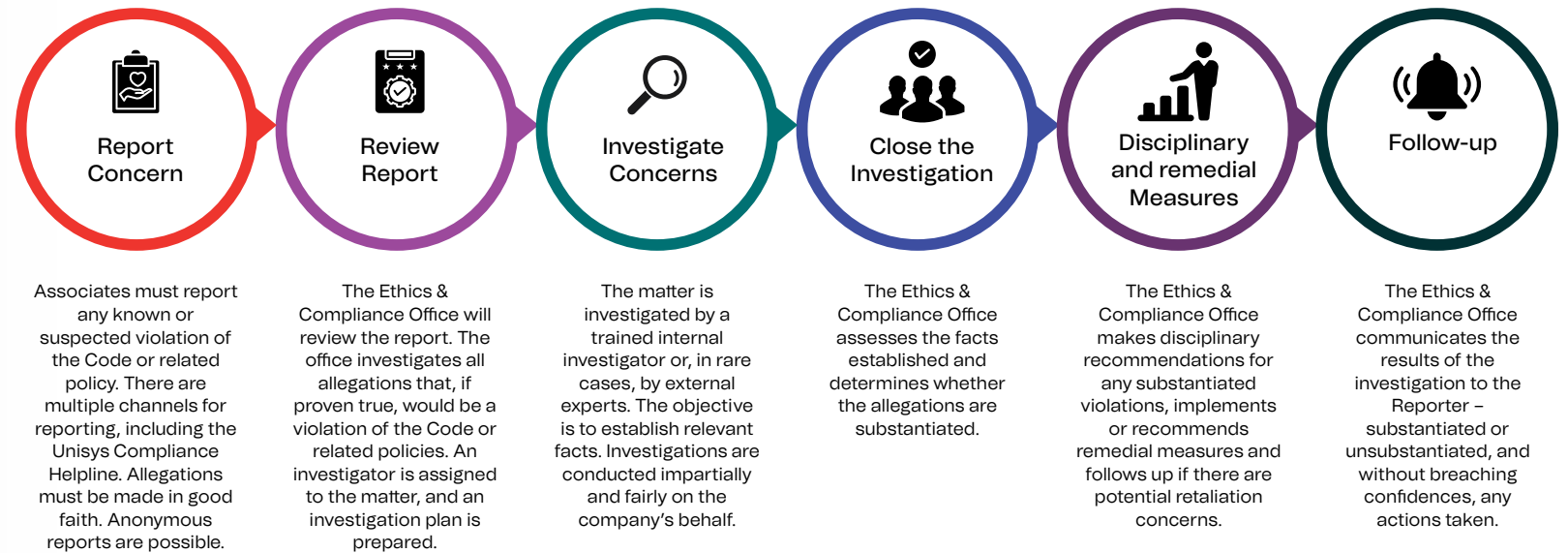
# Investigations

The Ethics & Compliance Office takes all reports made in good faith seriously and investigates them promptly, fairly, confidentially and with every effort to protect your identity. Associates should cooperate with any Unisys investigation conducted by the Ethics & Compliance Office, Human Resources or the Legal Department. Government agencies and other third parties may also request information from or about Unisys. If an outside party contacts you in an investigation, be courteous and respectful, but forward any requests immediately to the Ethics & Compliance Office or the Legal Department.

**Associates must:**

- Cooperate in any investigation: answer questions truthfully, and promptly provide all information requested.
- Never investigate matters yourself.
- Examine your actions to ensure you do not intentionally or unintentionally retaliate against anyone involved an investigation.

## The Investigations Process



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# Oversight

The Unisys Leadership Team and the Board of Directors are responsible for overseeing the Ethics and Compliance Program and compliance with our Code.

## ENFORCEMENT AND WAIVERS

Violation of our Code may result in disciplinary action, up to and including termination of employment. Waivers to provisions of our Code must be requested in writing sent to the Unisys Chief Compliance Officer and are not valid until approved by the Chief Compliance Officer and the General Counsel. Only the Board of Directors may waive a provision of our Code for a member of the Leadership Team or an officer of the company. Any waiver that is granted to an officer or a leader will be publicly disclosed as required by NYSE listing requirements and applicable laws, rules and regulations.



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## HOW TO CONTACT THE

# Ethics & Compliance Office

There are several ways to contact the Ethics & Compliance Office to report a concern or ask a question. Where permitted by law in your country, your report may be made anonymously through the Unisys Compliance Helpline, or you can ask the Ethics & Compliance Office to treat your report as anonymous.

Choose the reporting option you are most comfortable using, and trust that whichever option you choose, your confidentiality will be protected.

Web: [www.UnisysCompliance.com](http://www.UnisysCompliance.com), E-mail: [ComplianceEthicsOffice@unisys.com](mailto:ComplianceEthicsOffice@unisys.com)

Phone: U.S. toll-free 800-732-3247/ Outside the U.S., visit [www.UnisysCompliance.com](http://www.UnisysCompliance.com) for your local number.

Mail: Compliance & Ethics Office, Unisys Corporation, 801 Lakeview Drive, Blue Bell, PA 19422 USA



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This document constitutes Ethics Policy 1.0, effective 2/23/2021 and supersedes any prior versions. Printed versions of this document may not be current; verify the current version on the Unisys Policies & Procedures [website](#) before taking action. The English version is the prevailing version of this document. However, it is specified that in the circumstances where there would be discrepancies between this code and mandatory local laws, local laws will apply.

Country	Toll-Free Number	Country	Toll-Free Number	Country	Toll-Free Number
Argentina	800.1777.9999	Germany	0800.181.2396	New Zealand	0800.002341
Australia	1.800.763.983	Hong Kong	800.906.069	Norway	800.62.492
Austria	800.281119	Hungary	36.21211440	Peru	800.78323
Belgium	0800.260.39	India	000.800.050.1466	Philippines	(+63).2.8626.3049
Brazil	0.800.892.2299	Ireland	1800.904.177	Singapore	800.852.3912
Canada	800.461.9330	Japan	0800.170.5621	Spain	900.905460
Chile	1230.020.3559	Lithuania	8.800.30451	Switzerland	0800.838.835
China	400.120.3062	Luxembourg	800.27.311	Taiwan	00801.14.7064
Colombia	01.800.5189703	Malaysia	60.(0).1548770383	United Kingdom	0.(808).189.1053
Costa Rica	506.4000.3876	Mexico	800.681.6945	United States	800.461.9330
France	805.080339	Netherlands	0.800.022.0441	Uruguay	(000).401.912.22

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