



A MESSAGE FROM INSIGHTSOFTWARE'S CEO

Dear Colleagues:

insightsoftware is committed to conducting business honestly, ethically and responsibly to the community at large. It is our responsibility as a company and as individuals to always act with integrity and to conduct our business with respect. To be a successful organization, insightsoftware employees must act in a manner that reflects the principles of integrity outlined in this code.

As such, I encourage to take time to read the following pages and become familiar with insightsoftware's Code of Conduct. Maintaining integrity is the responsibility of all insightsoftware employees. If you become aware of a problem or issue – don't remain silent – step forward and report it,

This code may not prepare you for every situation you might encounter at work. When the appropriate course of action is not clear, you should seek guidance from your manager or our legal department.

Acting with integrity, openness, trust and good ethics should guide us all. These words matter. If we all act with integrity and encourage our colleagues to do the same, we will make insightsoftware a stronger company and terrific place to work. Thank you for your unwavering commitment to maintaining integrity for yourself, for insightsoftware, our customers and partners.

Regards,

Jim Triandiflou
Chief Executive Officer



CODE OF CONDUCT

Effective: April 12, 2021

GS Topco GP, LLC, including its subsidiaries and affiliates (collectively, “*insightsoftware*”), is committed to maintaining the highest standards of business conduct and ethics and ensuring legal compliance in every jurisdiction where we operate. This Code of Conduct (the “*Code*”) reflects insightsoftware’s policies, procedures, and principles of behavior that support this commitment. insightsoftware requires all of its world-wide board members, officers, management and employees (“*Representatives*”) to read, understand, and follow this Code. We expect all of our service partners, subcontractors, referral partners, consulting partners, distributors, resellers, and other business partners (collectively “*Business Partners*”) to adhere to legal and ethics compliance standards that are not lower than those set forth herein. insightsoftware expects its employees to inform Business Partners for which they are responsible of this expectation and to share copies of this Code with them. The insightsoftware Compliance Committee, composed of our Chief Financial Officer, Chief People Officer and General Counsel, is responsible for administering this Code. Please contact our Compliance Committee if you have any questions or are aware of any concerns in relation to this Code. You are required to report violations of this Code to the following email address: compliance@insightsoftware.com, as discussed in more detail below.

- 1. Honest and Ethical Conduct.** insightsoftware promotes high standards of integrity by conducting our affairs in an honest and ethical manner. The affairs and reputation of insightsoftware depend on the honesty, fairness, and integrity brought to the job by each of its Representatives and Business Partners. Unyielding personal integrity is the foundation of strong corporate ethics.
- 2. General Legal Compliance.** Obeying applicable laws and regulations, both in letter and in spirit, is a key element of this Code. Our success depends upon each Representative and Business Partner operating within legal guidelines and cooperating with local, national, and international authorities. We expect our Representatives and Business Partners to understand and comply with the legal and regulatory requirements applicable to their areas of responsibility. Our Representatives and Business Partners must comply with all applicable laws and regulations in the countries where they perform insightsoftware-related services or business. We are aware that laws may not be strictly enforced in certain countries or that legal violations may not trigger public scrutiny; however, these factors do not excuse our Representatives or Business Partners from fulfilling their legal compliance obligations.
- 3. Labor Laws.** Representatives and Business Partners are prohibited from using unlawful or forced labor or child labor when performing services for or on behalf of insightsoftware. All Representatives and Business Partners must abide by such restrictions.
- 4. Anti-Bribery & Anti-Corruption Compliance.** insightsoftware is strongly committed to complying with all applicable anti-corruption, anti-bribery, and anti-kickback laws. Engaging in bribery, corruption, or kickbacks in any form in relation to our business is strictly prohibited. Specifically, we prohibit offering, promising, providing, authorizing, requesting, or receiving directly or indirectly corrupt, improper, or illegal payments, gifts, hospitalities, entertainment, favors, or other benefits to or from any person whether in the government or private sector.



5. **Anti-Money Laundering Compliance.** insightsoftware prohibits its Representatives and Business Partners from engaging in any activity that facilitates money laundering or the funding of terrorist or criminal activities (collectively, “*Prohibited Transactions*”) in connection with our business. Money laundering is the act of concealing or disguising the existence, illegal origins, and/or illegal application of criminally derived income so that such income appears to have legitimate origins or constitute legitimate assets. While money laundering involves giving “dirty” money the appearance of legitimacy, terrorist financing generally involves using legally earned income to finance illegal activities. insightsoftware expects all of its Representatives and Business Partners to comply with all applicable laws and regulations regarding Prohibited Transactions.

6. **U.S. Export Control and Sanctions Compliance.** It is the policy of insightsoftware to fully comply with all applicable laws of the United States and other countries in which insightsoftware operates. U.S. export control laws and U.S. sanctions regulations include, but are not limited to: (1) the Export Administration Regulations (“EAR”) administered by the U.S. Commerce Department, Bureau of Industry and Security (“BIS”) at 15 C.F.R Sections 730-774; and (2) U.S. Sanctions administered by the U.S. Treasury Department, Office of Foreign Assets Control (“OFAC”) at 31 C.F.R Parts 501-599, (collectively, the “Export Regulations”).

7. **Anti-Boycott Compliance.** The U.S. Export Administration Act (EAA) and the Internal Revenue Code prohibit U.S. persons from participating in boycotts imposed by other countries if those boycotts are not approved by the United States. Companies and individuals that violate these anti-boycott restrictions may face criminal consequences. In addition, companies that are asked to comply with such boycotts are obligated to report those requests to the U.S. government, even if they do not agree to abide by such boycotts.

Without any limitation to the above, insightsoftware expects all Representatives and Business Partners to refuse to engage in the following types of boycotts in relation to insightsoftware’s business:

- Agreements to refuse or any actual refusal to do business with or in Israel or with blacklisted companies from Israel.
- Agreements to furnish or any actual furnishing of information about business relationships with or in Israel or with blacklisted companies from Israel.
- Agreements to discriminate or any actual discrimination against other persons based on race, religion, sex, national origin, or nationality.
- Agreements to furnish or actual furnishing of information about the race, religion, sex, or national origin of another person.
- Implementing letters of credit containing prohibited boycott terms or conditions such as those listed above.

Representatives and Business Partners must notify our Compliance Committee if any party asks them to engage in boycotts or boycott-related activities such as those described above.

8. **Conflicts of Interest.** All Representatives must avoid conflicts of interest with respect to the performance of services for insightsoftware. This may occur when a Representative’s business or personal interests interfere in any way with the performance of its duties for or the best interests of insightsoftware. We expect our Representatives to be free from influences that conflict with the best



interests of insightsoftware. Even the appearance of a conflict of interest where none actually exists can be damaging and must be avoided.

- 9. Maintenance of Corporate Books and Records.** insightsoftware is committed to maintaining accurate books, records, and accounts in relation to its business. Representatives and Business Partners are prohibited from concealing bribes, fraud, or criminal activities, or falsifying any other transaction or expense in invoices, purchase orders, or other documents that they prepare in relation to their services for insightsoftware. In relation to our business, we expect Representatives and Business Partners to maintain (i) accurate and honest corporate, business, and accounting records, and (ii) follow our internal accounting controls that prevent unauthorized activities or expenses. insightsoftware prohibits Representatives and Business Partners from using off-the-books accounts or other slush funds in relation to our business.
- 10. Protection and Proper Use of Company Assets.** Representatives are expected to protect insightsoftware's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on insightsoftware's profitability. Company property, such as office supplies, computer equipment, buildings, products, and rental or other equipment, must only be used for legitimate business purposes. Representatives may not use insightsoftware's corporate name, any brand name or trademark owned or associated with insightsoftware, or any insightsoftware letterhead stationery for any personal or other purpose, unless such purpose is approved in advance by our management in writing.
- 11. Confidentiality.** As a private company, one of insightsoftware's most important assets is our confidential information. As a Representative or Business Partner of insightsoftware, you may learn of information about insightsoftware that is non-public, confidential or proprietary. This includes non-public information that might be of use to competitors or harmful to insightsoftware or its customers if disclosed, such as business, marketing and service plans, financial information, ideas, designs, databases, customer lists, pricing strategies, personnel data, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers and e-mail addresses), and similar types of information provided to us by our customers, suppliers and partners. Representatives are expected to keep all such information confidential.
- 12. Media/Public Discussions.** It is insightsoftware's policy to disclose material information concerning insightsoftware to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in insightsoftware will have equal access to information. All inquiries or calls from the press and financial analysts regarding insightsoftware must be referred to the insightsoftware Chief Marketing Officer.
- 13. Business Partners.** We are committed to working with only ethical Business Partners. insightsoftware forbids Representatives from working with Business Partners in relation to insightsoftware's business if those Business Partners have a history or reputation for engaging in corrupt, unethical, or illegal practices, raise a material money laundering risk, are the subject of US sanctions, or would otherwise cause insightsoftware to be viewed in a negative light.

Representatives must work with our Business Partners to ensure that they do not raise legal or reputational risk for us. No Business Partner may perform services for or be compensated by



insightsoftware, unless that Business Partner has executed a written agreement with insightsoftware. Verbal agreements are not acceptable. Representatives that become aware of any violations by a Business Partner of those terms or any applicable law must report those violations to our Compliance Committee.

14. Government Contracts. From time to time, insightsoftware may engage in business with certain governments. Doing business in the public sector is very different from doing business in the commercial marketplace. Government contracting laws are far reaching and complex. Many of these laws apply to both prime contracts and subcontracts. Submitting an invoice or filing a claim in relation to a government contract that relies on false supporting data can result in civil fines or penalties and even criminal prosecution. Also, improper conduct by a contractor or subcontractor can result in price reductions, contract cancellation, and the contractor's suspension or debarment from doing business with a government. Insightsoftware expects its Representatives and Business Partners to comply with all laws and regulations in this area.

15. Questions and Reporting. You must notify the Compliance Committee of violations of this Code or any of our other policies or procedures. By reporting such matters, you will enable us to achieve our compliance goals. All questions, concerns or violations of applicable laws/regulations or this Code must be directed to our Compliance Committee, which consists of insightsoftware's Chief Financial Officer, Chief People Officer and General Counsel. You may reach out to each respective member individually, or email compliance@insightsoftware.com.

If necessary, you may contact the Compliance Committee on an anonymous basis; however, insightsoftware will be able to respond more effectively if you provide your name.

Insightsoftware will ensure that appropriate confidentiality measures are taken and will not retaliate against any individual for reporting violations in good faith.

If credible allegations or evidence of violations of this Code of Conduct are submitted to the Compliance Committee, the Compliance Committee will determine appropriate actions, including investigating those matters.

16. Changes to this Code of Conduct. insightsoftware reserves the right to modify any part of this Code from time to time to reflect changes to legal obligations and company policies. insightsoftware will alert you to any change to this Code by indicating the date it was last updated at the top of the first page.