

Business Conduct

A Guide to the Way SIS Does Business

SIS conducts business ethically, honestly, and in full compliance with all laws and regulations. This applies to every business decision in every area of the company worldwide.

SIS's Principles of Business Conduct

SIS's success is based on creating innovative, high-quality services and on demonstrating integrity in every business interaction. SIS's principles of business conduct define the way we do business worldwide. These principles are:

- **Honesty.** Demonstrate honesty and high ethical standards in all business dealings.
- **Respect.** Treat customers, suppliers, employees, and others with respect and courtesy.
- **Confidentiality.** Protect the confidentiality of SIS's information and the information of our customers, suppliers, and employees.
- **Compliance.** Ensure that business decisions comply with all applicable laws and regulations.

Your Responsibilities

SIS's Business Conduct Policy and principles apply to employees, independent contractors, consultants, and others who do business with SIS. You are expected to:

- **Follow the policy.** Comply with SIS's Business Conduct Policy, principles, and all applicable legal requirements.
- **Speak up.** If you have knowledge of a possible violation of SIS's Business Conduct Policy or principles, other SIS policies, or legal or regulatory requirements, you must notify either your manager (provided your manager is not involved in the violation), Human Resources, Legal, Finance, or the Business Conduct Helpline.
- **Use good judgment.** Apply SIS's principles of business conduct, review our policies, review legal requirements, and then decide what to do.
- **Ask questions.** When in doubt about how to proceed, discuss it with your manager or your Human Resources representative. If you need more support, contact the Business Conduct Helpline. Failure to comply with the SIS's Business Conduct Policy, or failure to report a violation, may result in disciplinary action up to and including termination of employment or the end of your working relationship with SIS.

Retaliation Is Not Tolerated

SIS will not retaliate -- and will not tolerate retaliation -- against any individual for filing a good-faith complaint with management, HR, Legal, Finance, or the Business Conduct Helpline, or for participating in the investigation of any such complaint.

However, if a report is made in "bad faith," for instance, if a false or misleading report is made in

a deliberate effort to get someone in trouble (as opposed to an honest mistake), the person making the report may be subject to disciplinary action.

Can you give an example of conflicts of interest or potential divided loyalty?

Your cousin needs a summer internship and you decide to hire her into your organization, or, your best friend owns a business that is being considered as a vendor for SIS, and you are one of the decision makers.

Conflicts of Interest

A conflict of interest is any activity that is inconsistent with or opposed to SIS's best interests, or that gives the appearance of impropriety or divided loyalty. Avoid any situation that creates a real or perceived conflict of interest. Use good judgment, and if you are unsure about a potential conflict, talk to your manager, contact Human Resources, or contact the Business Conduct Helpline.

Do not conduct SIS business with family members or others with whom you have a significant personal relationship. In rare cases where exceptions may be appropriate, written approval from a director of your division is required.

You shouldn't use your position at SIS to obtain favored treatment for yourself, family members, or others with whom you have a significant relationship. This applies to product purchases or sales, investment opportunities, hiring, promoting, selecting contractors or suppliers, and any other business matter.

If you believe you have a potential conflict involving a family member or other individual, disclose it to your manager.

Outside Employment and Inventions

Full-time SIS employees must notify their manager before taking any other employment. In addition, any employee (full-time or part-time) who obtains additional outside employment, has an outside business, or is working on an invention must comply with the following rules. **Do not:**

- Use any time at work or any SIS assets for your other job, outside business, or invention. This includes using SIS workspace, phones, computers, internet access, copy machines, and any other SIS assets or services.
- Use your position at SIS to solicit work for your outside business or other employer, to obtain favored treatment, or to pressure others to assist you in working on your invention.
- Participate in an outside employment activity that could have an adverse effect on your ability to perform your duties at SIS.

- Use confidential SIS or SIS client information to benefit your other employer, outside business, or invention.

Before participating in inventions or businesses that are in the same area as your work for SIS or that compete with or relate to SIS's present or reasonably anticipated business, products, or services, you must have written permission from your manager, an SIS attorney, and the director of your division.

Individual Conduct

May I occasionally use my SIS email address for my outside business?

No. Although limited personal use of your SIS email is permitted for personal activities, you may never use your SIS email for an outside business.

Can I use the products or services offered by SIS clients to the public?

Generally, yes, but do not use your position at SIS to get favored treatment and always be mindful of your confidentiality obligations vis-à-vis Confidential Information of SIS and customers.

May I serve on the board of directors of an outside enterprise or organization?

If you plan to serve on a board, you must obtain approval from your manager and the director of your division. In addition, directors and other executive team members must obtain the approval of their manager and the CEO before they can accept a position on the board of directors of a private or publicly traded company (other than nonprofit entities).

I have stock in companies that do business with SIS. Is this a problem?

Probably not. However, it could be a concern if (1) you're influencing a transaction between SIS and the company, or (2) the transaction is significant enough to potentially affect the value of your investment.

How do I know whether information is material?

Determining what constitutes material information is a matter of judgment. In general, information is material if it would likely be considered important by an investor buying or selling the particular stock.

Does SIS's policy apply to buying or selling stock in other companies?

Yes. For example, say you learn about a customer's new product plans through activities to which you are privy while at work. If you purchase stock in the customer's company or advise others to do so, it could be viewed as insider trading.

Need more information?

In the U.S., refer to SIS's Harassment policy. Outside the U.S., contact Human Resources.

Personal Investments

Many SIS employees have investments in publicly traded stock or privately held businesses. In general, these are fine, but investments may give rise to a conflict of interest if you are involved in or attempt to influence transactions between SIS and a business in which you are invested. If a real or apparent conflict arises, disclose the conflict to your manager. Your manager will help determine whether a conflict exists and, if appropriate, the best approach to eliminate the conflict. If you still need help, contact the Business Conduct Helpline..

Workplace Relationships

Personal relationships in the workplace may present an actual or perceived conflict of interest when one individual in the relationship is in a position to make or influence employment decisions regarding the other. If you find yourself in such a relationship, you must notify Human Resources so they may assist you in resolving any potential conflicts. Employees should not allow their relationships to disrupt the workplace or interfere with their work or judgment.

Buying and Selling Stock

Never buy or sell stock while you are in possession of information obtained through your employment at SIS that has not been publicly announced and could have a material effect on the value of the stock. It is also against SIS policy and may be illegal to give others, such as friends and family, tips on when to buy or sell stock while you are in possession of material, nonpublic information concerning that stock.

Harassment and Discrimination

SIS encourages a creative, culturally diverse, and supportive work environment. SIS does not tolerate harassment or discrimination based on factors such as race, color, sex, sexual orientation, gender identity characteristics or expression, religion, national origin, age, marital status, disability, medical condition, veteran status, or pregnancy. Additional restrictions may apply based on regional laws and regulations. These requirements apply to interactions with employees, customers, suppliers, and applicants for employment and any other interactions where you represent SIS.

If you feel that you have been harassed or discriminated against or have witnessed such behavior, report the situation to a manager or Human Resources. You may also contact the Business Conduct Helpline.

What is harassment?

Harassment can be verbal, visual, or physical in nature. Specific examples of prohibited harassing conduct include, but are not limited to, slurs, jokes, statements, notes, letters, electronic communication, pictures, drawings, posters, cartoons, gestures, and unwelcome physical contact that are based on an individual's protected class.

Confidential Employee Information

As part of your job, you may have access to personal information regarding other SIS employees or applicants, including information regarding their employment history, personal contact information, compensation, health information, or performance and disciplinary matters. This information is confidential and should be shared only with those who have a business need to know. It should not be shared outside SIS unless there is a legal or business reason to share the information and you have approval from your manager.

Customer and Third-Party Information

Customers, suppliers, and others disclose confidential information to SIS for business purposes. It is the responsibility of every SIS employee to protect and maintain the confidentiality of this information. Failure to protect customer and third-party information may damage relations with customers, suppliers, or others and may result in legal liability. See the SIS Customer Privacy Policy.

Nondisclosure Agreements

When dealing with a supplier, vendor, or other third party, never share confidential information without your manager's approval. Also, never share confidential information outside SIS (for example, with vendors, suppliers, or others) unless a nondisclosure agreement is in place. These agreements document the need to maintain the confidentiality of the information. Original copies of nondisclosure agreements must be forwarded to the legal department. Always limit the amount of confidential information shared to the minimum necessary to address the business need.

Personal Information

Subject to rules or regulations affecting an employee's rights, SIS may monitor or search its work environments, including equipment, networks, mail, and electronic systems, without notice. SIS monitors facilities and equipment to promote safety, prevent unlawful activity, investigate misconduct, manage information systems, comply with legal guidelines, and for other business purposes.

Is personal information on my computer system private?

No. Limited personal use of SIS equipment and systems is allowed. However SIS may monitor equipment and systems. You should not have any expectation about the privacy of content or personal information.

Public Speaking and Press Inquiries

All public speaking engagements that relate to SIS's business or products must be pre-approved by your manager. If you receive approval to make a public presentation at a business meeting or conference, you may not request or accept any form of personal compensation from the organization that requested the presentation. This does not prohibit accepting reimbursement for expenses, if approved by your manager.

Only authorized spokespersons are permitted to represent SIS in media relations. SIS frequently has confidentiality commitments to its clients that preclude public commentary on client-related matters. If you are approached by a member of the media, respectfully decline comment on any matters relating to confidential information pertaining to a client of SIS.

If I make a presentation on my own time, may I accept a payment?

That depends. If you are representing SIS, you may not accept payment. If you are on your own time and are not representing SIS, you may be allowed to accept payment. Before accepting this type of opportunity, check with your manager, Human Resources, or the Business Conduct Helpline.

Publishing Articles

If you author an article or other publication, do not identify yourself in the publication as an SIS employee without prior approval from Human Resources. In addition, all publications that relate to your job, or to SIS's present or reasonably anticipated future business or services, must be pre-approved by Human Resources.

Substance Abuse

Employees are prohibited from manufacturing, distributing, dispensing, possessing, using, or being under the influence of illegal drugs in the workplace. Use of alcohol or medications on the job or before work can cause safety issues, damage customer relations, and hurt productivity and innovation. Use good judgment and keep in mind that you are expected to perform to your full ability when working for SIS. View SIS's policy on Drugs in the Workplace.

Individual Conduct

What if I have a substance abuse issue?

Help yourself and SIS by taking action. Talk to your Human Resources representative or, in the U.S., view information on the Employee Assistance Program.

Protecting SIS's Assets and Information

At SIS, we all have an obligation to protect SIS's property and to abide by the following guidelines:

- **Care for the company.** SIS remains an amazing company because of its people. SIS employees care deeply about the company. Protect our physical assets like equipment, supplies, cash, and charge cards. Be on the lookout for any instances you believe could lead to loss, misuse, waste, or theft of SIS property and tell someone about it. Speaking up shows you care.
- **Keep the mystery alive.** SIS is secretive because we know our clients expect us to safeguard their Confidential Information to an even greater extent than if it were our own. Frequently, SIS is directly responsible for ensuring client secrecy. Use extreme care to protect SIS's proprietary information, as well as that of its clients. Our job is to keep it from falling into the wrong hands, especially information about current and future products and services.
- **Be upstanding.** Follow our procurement procedures when acquiring goods or services, and use SIS's assets only for legal and ethical purposes.
- **Keep it clean.** Trash is inevitable. Waste is not. Before disposing of SIS assets, discuss your plans with your manager, get approval, and follow applicable policies.

What are assets?

Assets include SIS's proprietary information (such as intellectual property, confidential business plans, unannounced product plans, sales and marketing strategies, and other trade secrets), as well as physical assets like cash, equipment, supplies, and product inventory.

Can I give an SIS-owned asset (e.g. phone or laptop) to my family member for use?

No. You are responsible for protecting SIS's assets at all times. You must follow all security procedures regarding SIS's property. If you are done using an asset of SIS, return it to SIS.

Confidential SIS Information

Most SIS clients consider one of their greatest assets to be information about their products and services, including future product offerings. Never disclose confidential, operational, financial, trade secret, or other business information without verifying with your manager that such disclosure is appropriate.

Typically, disclosure of this information is very limited, and the information may be shared with vendors, suppliers, or other third parties only after a nondisclosure agreement is in place. Even within SIS, confidential information should be shared only on a need-to-know basis. The Non-

Disclosure Agreement you signed when you joined SIS defines your duty to protect information.

SIS Inventions, Patents, and Copyrights

SIS's practice is to consider for patenting the inventions of its employees, regardless of whether the inventions are implemented in actual products. If you are involved in product development, you should contact the legal department regarding the patentability of your work. Be alert to possible infringement of SIS's patents and bring any possible infringements directly to the legal department.

If you create original material for SIS that requires copyright protection, such as software, place SIS's copyright notice on the work and submit a copyright disclosure form to the legal department.

Responsibilities to SIS

First, verify that there is a business need for the disclosure. Second, obtain your manager's approval for the disclosure. Third, be sure that a nondisclosure agreement is in place with the vendor or third party, and that you forward the original copy of the agreement to the legal department.

If you are still unsure, check with the legal department before making the disclosure.

How do I identify confidential SIS information in documents?

Mark these documents "SIS Confidential."

What if I have a specific question on the use of the SIS name, names of products or services, or the SIS logo?

Please direct questions about the SIS corporate identity to legal department.

Accuracy of Records and Reports

Accurate records are critical to meeting SIS's legal, financial, and management obligations. Ensure that all records and reports, including timecards, customer information, technical and product information, correspondence, and public communications, are full, fair, accurate, timely, and understandable. Never misstate facts, omit critical information, or modify records or reports in any way to mislead others, and never assist others in doing so.

Business Expenses

All employees must observe policies and procedures regarding business expenses, such as meal

and travel expenses, and submit accurate expense reimbursement requests. Guidelines on daily meal expenses vary worldwide.

How can I learn more about procedures for meals and travel?

See SIS's Travel Policy or talk to your manager.

Establishing Bank Accounts

All SIS bank accounts must be approved and established by SIS's finance department. All payments must be made by recordable and traceable methods. For more information, contact the finance department.

Money Laundering

Money laundering is the process by which individuals or organizations try to conceal illicit funds or make these funds look legitimate. If you deal directly with customers or vendors, the following examples may be indications of potential money laundering:

- Attempts to make large payments in cash
- Payments by someone who is not a party to the contract
- Requests to pay more than provided for in the contract
- Payments made in currencies other than those specified in the contract
- Payments from an unusual, nonbusiness account

If I suspect money laundering, what should I do?

Advise your manager or contact the SIS legal department.

Document Retention and Legal Hold

As an SIS employee, you have a responsibility to manage documents and make decisions on document retention. The definition of "document" is extremely broad. For example, every email or other electronic file, every customer record, and every transaction involves the creation of a document. Different documents have different retention periods. Check with your manager or contact Records Management to determine the appropriate retention period for documents in your area.

At times, SIS may need to retain documents beyond the period they would normally be retained. The most common reasons are litigation or other legal matters. In these situations, retention and preservation of documents is critical. If you have documents that may be required for litigation or other legal matters, the legal department will place those documents on a legal hold, meaning the documents cannot be altered, destroyed, deleted, or modified in any manner. Legal will notify the individuals most closely identified with the documents about the legal hold and will provide instructions for retaining the documents. Recipients of a legal hold must ensure that

these instructions are followed. A legal hold remains in effect until you are notified by the legal department in writing.

Tell me more about legal holds.

In a litigation case or other legal matter, SIS may be required to produce documents. In these cases the legal department may put a legal hold on certain documents to prevent the documents from being destroyed, altered, or modified. If it is found that SIS has failed to retain or produce required documents, penalties or adverse rulings may result. Adverse rulings in major litigation cases can cost SIS a significant amount of money. Failure of employees to retain and preserve documents placed on legal hold may result in discipline or discharge.

Customer Focus

Every service we provide is for our customers. Focus on providing innovative, high-quality services and demonstrating integrity in every business interaction. Always apply SIS's principles of business conduct.

Competition

SIS will always compete vigorously and in a fair and ethical way. Competitive success is built on providing good value and service excellence. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not publicize, discuss or share with competitors (even indirectly) pricing information or engage in any conduct or practices which would conflict with the laws applicable to the business concerned.

Freedom of Association

SIS respects the right of workers to choose whether or not to lawfully and peacefully form or join trade unions of their choosing and whether or not they wish to bargain collectively.

Third-Party Intellectual Property

It is SIS's policy not to knowingly use the intellectual property of any third party without permission or legal right. If you are told or suspect that SIS may be infringing an intellectual property right, including patents, copyrights, trademarks, or trade secrets owned by a third party, you should contact the legal department.

Copyright-Protected Content

Never use or copy software, music, videos, publications, or other copyright-protected content at work or for business purposes unless you or SIS are legally permitted to use or make copies of

the protected content.

Never use SIS facilities or equipment to make or store unauthorized copies.

Customer and Business Relationships

Where can I learn more about information protection and nondisclosure agreements?

See frequently asked questions about nondisclosures and confidentiality agreements at SIS.

Where can I get a nondisclosure agreement?

SIS provides nondisclosure agreements for the U.S. and other locations outside the US.

As long as the information helps SIS, why is the source of business intelligence an issue?

Obtaining information illegally or unethically could damage SIS's reputation and in some cases could subject you and SIS to legal liability. For example, using illegally or unethically obtained information in a bid to the government could result in disqualification from future bidding and in criminal charges.

May I keep my personal music on my computer at work?

If you are authorized to make copies of the music for personal use (for example, you purchased the music on iTunes), you may keep the music on your computer.

Are business meals, travel, and entertainment considered gifts?

Yes. Anything of value is considered a gift.

Can I avoid these rules if I pay for gifts to customers or business associates myself?

No. If the gift is given for business reasons and you are representing SIS, the gift rules apply.

Giving and Receiving Business Gifts

Employees may not give or receive gifts or entertainment to or from current or potential vendors, suppliers, customers, or other business associates unless all of the following conditions are met:

- **Nominal value.** The value of the gift is less than US\$150. Exceptions must be approved by your director (for director-level employees, exceptions must be approved by your vice-president).
- **Customary.** The item is a customary business gift and would not embarrass SIS if publicly disclosed. Cash is never an acceptable gift. Giving or receiving cash is viewed as a bribe or kickback and is always against SIS policy.

- **No favored treatment.** The purpose of the gift is not to obtain special or favored treatment.
- **Legal.** Giving or accepting the gift is legal in the location and under the circumstances where given.
- **Recipient is not a government official.** Never provide a gift, including meals, entertainment, or other items of value, to a U.S. or foreign government official without checking with the legal department in advance. See page 13 for more information on gifts to government officials.

This policy does not preclude SIS as an organization from receiving and evaluating complimentary products or services. It is not intended to preclude SIS from giving equipment to a company or organization, provided the gift is openly given, consistent with legal requirements, and in SIS's business interests. The policy also does not preclude the attendance of SIS employees at business-related social functions, if attendance is approved by management and does not create a conflict of interest.

Competition and Trade Practices

Laws regulating competition and trade practices vary around the world, but certain activities, such as price fixing and agreeing with a competitor to allocate customers, are almost always illegal and are absolutely prohibited under SIS policy.

You should not:

- Agree with competitors or exchange information with competitors on prices, policies, contract terms, costs, inventories, marketing plans, or capacity plans.
- Agree with a competitor that the competitor will sell services to Customer A (and you will not), and that you will sell services to Customer B (and your competitor will not).
- Describe the products or services of competitors inaccurately to promote SIS products or services.
- Engage in any pricing or other practices that could defraud a customer or others.
- Violate fair bidding practices, including bidding quiet periods, or provide information to benefit one vendor over other vendors.

Endorsements

When representing SIS, never endorse a product or service of another business or an individual unless the endorsement has been approved by your manager and Corporate Communications. This does not apply to statements you may make in the normal course of business about third-party products that are sold by SIS.

What is an example of an endorsement?

A friend writes a great book on security architecture and asks you to endorse the book by making a statement on the back cover. If you make such an endorsement, don't include your job title or affiliation with SIS.

Governments as Customers

Governments are unique customers for SIS. Governments often place special bidding, pricing, disclosure, and certification requirements on firms with which they do business. Discuss these requirements with your SIS Legal representative before bidding for government business. SIS rarely bids on government business.

Gifts to U.S. Officials

It may be illegal to give a gift, even an inexpensive meal or a T-shirt, to a government employee. The rules vary depending on the location and job position of the government employee (for example, rules may vary by state, school district, and city, and there may be different rules for various elected and non-elected officials). To prevent violations, review all gifts to government officials with Government Affairs before giving a gift.

Gifts to Non-U.S. Officials

In many countries it is considered common courtesy to provide token/ceremonial gifts to government officials on certain occasions to help build relationships. Check local requirements and review any such gifts exceeding US\$25 in advance with the legal department.

For meals, the US\$25 limit does not necessarily apply. Check here for value limits by country on meals to public officials and employees. Meals of any value should be avoided with officials from government agencies where SIS has a pending application, proposal, or other business.

What is considered a gift to a U.S. or foreign official?

In most cases, anything of value that is given is considered a gift. This includes items such as meals, golf, entertainment, and product samples. Cash is never an acceptable gift. Typically, giving cash is viewed as a bribe or kickback and is against SIS policy.

Who is a "foreign official"?

A foreign official is any official or employee of a foreign government or public international organization (including departments or agencies of those governments or organizations), or any person acting in an official capacity. Also included are employees of a state-run or state-owned business, such as a public utility, and employees of a public/government-run school or university.

No Bribery or Corruption

At SIS, we do not offer or accept bribes or kickbacks in any form, and we do not tolerate corruption in connection with any of our business dealings. You may not offer or receive bribes or kickbacks to or from any individual, whether that individual is a government official or a private party. For additional information, see SIS's Anti-Corruption Policy.

Political Contributions

SIS does not make political contributions to individual candidates. The only exceptions to this might be in countries where there is a legal requirement to do so. All corporate political contributions, whether monetary or in-kind (such as the donation/lending of equipment or technical services to a campaign), must be approved in advance by SIS legal department.

Employees may not use SIS assets (including employee work time, or use SIS premises, equipment, or funds) to personally support candidates and campaigns.

It is illegal for SIS to reimburse an employee for a contribution.

Hiring Government Employees

Laws often limit the duties and types of services that former government, military, or other public sector employees may perform as employees or consultants of SIS. Employment negotiations with government employees are prohibited while the employees are participating in a matter involving SIS's interests.

Environment, Health, and Safety (EHS)

SIS operates in a manner that conserves the environment and protects the safety and health of our employees. Conduct your job safely and consistently with applicable EHS requirements. Use good judgment and always put the environment, health, and safety first. Be proactive in anticipating and dealing with EHS risks. In keeping with our commitment to the safety of our people, SIS will not tolerate workplace violence. For additional information, review SIS's Workplace Violence policy.

Charitable Donations

Employees are encouraged to support charitable causes of their choice, as long as that support is provided without the use or furnishing of SIS assets (including employee work time, or use of SIS premises, equipment, or funds). Any charitable donations involving SIS assets require the approval of the Chief Executive Officer or Chief Financial Officer.

Community Activities and Public Positions

At SIS, we comply with all laws and regulations and operate in ways that benefit the communities in which we conduct business. SIS encourages you to uphold this commitment to the community in all your activities. If you hold an elected or appointed public office while employed at SIS, advise the legal department. Excuse yourself from involvement in any decisions that might create or appear to create a conflict of interest.

Your Obligation to Take Action

Always apply SIS's principles of business conduct, follow SIS policies, and comply with laws and regulations. When you are unsure, take the initiative to investigate the right course of action. Check with your manager, Human Resources, Legal, Licensing & Compliance, or Finance, and review our policies on SIS website. If you would like to talk with someone outside your immediate area, consider contacting the Business Conduct Helpline.

If you know of a possible violation of SIS's Business Conduct Policy or legal or regulatory requirements, you are required to notify your manager (provided your manager is not involved in the violation), Human Resources, Legal, Finance, or the Business Conduct Helpline. Failure to do so may result in disciplinary action.

Employees must cooperate fully in any SIS investigation and should keep their knowledge and participation confidential while the investigation is ongoing to help safeguard the integrity of the investigation.

Business Conduct Helpline

The Business Conduct Helpline is available 24/7 to all employees worldwide to help answer your questions on business conduct issues, policies, regulations, and compliance with legal requirements. It also allows you to advise SIS of situations that may require investigation or management attention.

Employees can expect that SIS will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, policies and procedures.

The Business Conduct Helpline is committed to keeping your issues and identity confidential. If you would be more comfortable doing so, you may contact the Helpline anonymously. Your information will be shared only with those who have a need to know, such as those involved in answering your questions or investigating and correcting issues you raise. Be advised, however, that if you raise issues anonymously, we will make an initial determination regarding whether your issue has been raised in good faith. If we decide that your issue has not been raised in good faith, we will not investigate further.

Different states and different countries have varying laws on what is required to be kept

confidential. All parties who raise issues under this Business Conduct Policy should be aware that SIS treats matters confidentially to the extent it can do so. This means that SIS frequently will not share the results of its investigation(s) with the party or parties who raised or reported an issue, including any actions that may or may not have been taken in response to a report, as well as the conclusions reached as the result of an investigation.

Note that if your information involves accounting, finance, or auditing, the law may require that necessary information be shared with the SIS Board of Directors.

Due to legal restrictions, anonymous use of the Business Conduct Helpline is not encouraged in certain countries (for example, France).

SIS will not retaliate—and will not tolerate retaliation—against any individual for good-faith use of the Business Conduct Helpline. Information on contacting the Business Conduct Helpline—including via email, toll-free telephone, and web access—is available on the Business Conduct section of the SIS website.

Contact Points

Telephone

Business Conduct Helpline: **888-487-7658**

Main SIS Telephone Number: **800-201-3742**

Internet

www.sis.us

[Business Conduct Helpline Webform](#) (available through the SIS Backstage)

Email

Human Relations (HR)	hr@sis.us
Legal	legal@sis.us
Finance	finance@sis.us
Licensing & Compliance	compliance@sis.us
Business Conduct Helpline	helpline@sis.us