

SUSE Supplier Code of Business Ethics

Effective December 2025

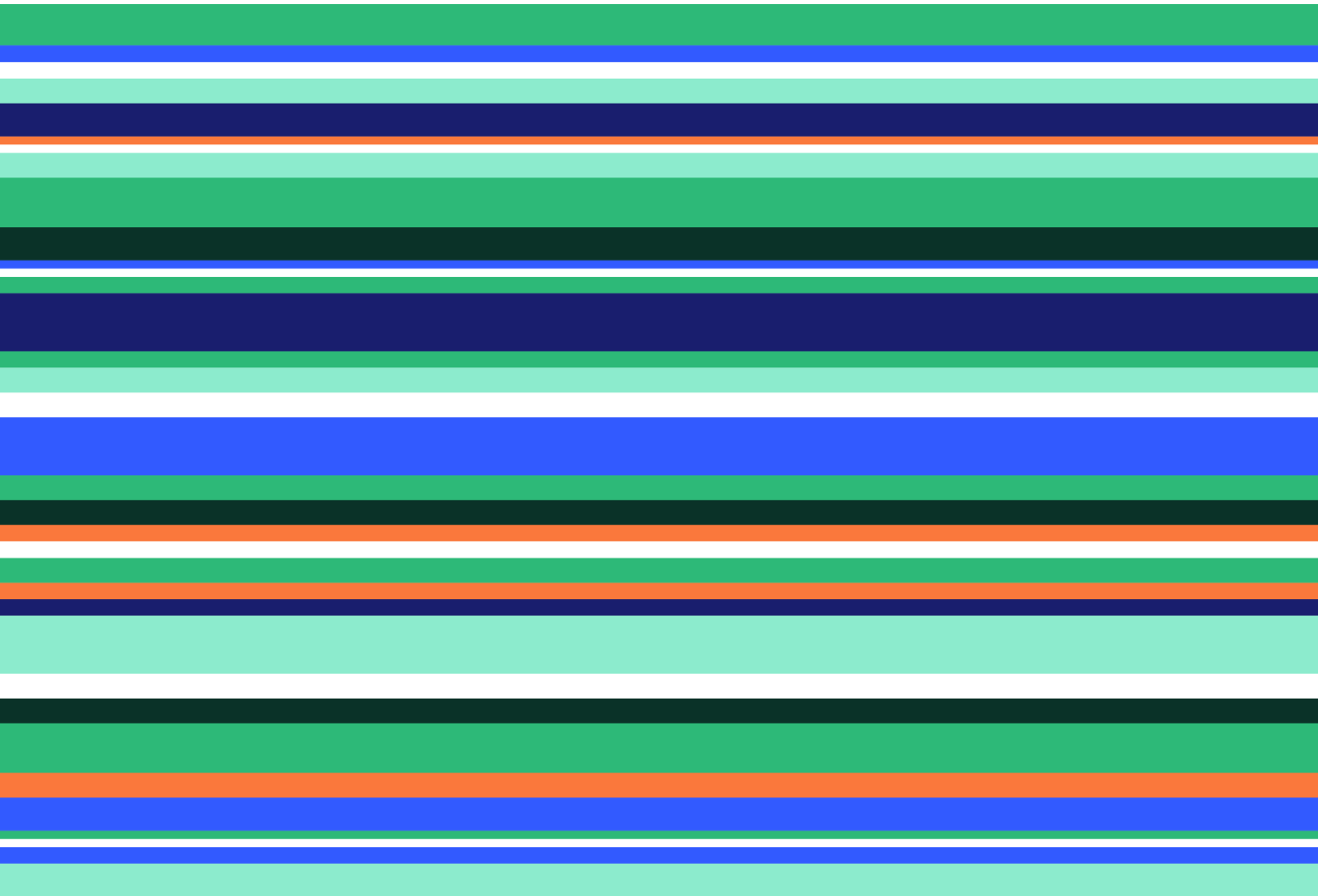


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This document is intended to provide policy, procedure, standards or guidance regarding SUSE. This document is reviewed at least annually to ensure validity.

SUSE reserves the right to modify or change any policies and procedures outlined in these pages at any time without prior notice (subject to consultation in some countries).

Neither all nor part of this document shall be reproduced or released by a recipient without the stated Policy Owner's explicit authorization.

Message from SUSE'S Chief Financial Officer

Dear Supplier,

SUSE is a global leader in innovative, reliable and enterprise-grade open source solutions, and we are equally open in how we do business. We behave responsibly and conduct business with suppliers and vendors with fairness, honesty, and in an environmentally and socially conscious manner. We promote the highest ethical standards and comply with both the letter and spirit of all applicable laws.

We believe high ethical standards are the foundation of a successful business. Supplier and vendor loyalty and respect from the communities in which we do business stem from our reputation that we do the right thing. SUSE's values inform all business interactions and how we do business.

Our Supplier Code of Business Ethics reflects our commitment to uphold the highest ethical standards and is an integral part of our daily business operations and practices. We ask that you read it, understand it and promote it. We expect all SUSE's suppliers to comply with these requirements as a minimum and that you will always go beyond what is the legal minimum in the country under whose laws you operate. In the event a matter is reported to SUSE, we will ensure the protection of supplier/vendor whistleblower confidentiality.

SUSE values your partnership and commitment to doing business the right way - aligned to our approach to ethics and compliance - as we work together to make SUSE one of the world's leading open source companies.

Best regards,

Ian Halifax
Chief Financial Officer

1. Introduction

SUSE's suppliers are a vital part of the greater SUSE story. SUSE is an open, inclusive, and integrity-driven company and we require that our suppliers exhibit and live by these same values. Our values are the thread that unites us as a company. They sit at the heart of our culture and represent the ethos of everyone at SUSE. View SUSE's Values [here](#).

2. Purpose

The purpose of SUSE's Supplier Code of Business Ethics (Supplier COBE) is to ensure that our suppliers meet all their legal and ethical obligations. Among SUSE's most fundamental operating principles are adherence to high ethical standards and compliance with all laws and regulations applicable to our business.

There are a variety of laws that apply to SUSE and its operations, and some carry criminal penalties. These laws include, but are not limited to:

- Advertising laws
- Antitrust laws
- Employment-related laws
- Equal employment opportunity laws
- Export laws
- Fair credit practices laws
- Fair trade practices laws
- Federal and state laws (including securities and exchange laws)
- Internet usage laws
- Occupational safety laws
- Privacy laws

SUSE expects that its suppliers to "do the right thing," but as an absolute minimum, we expect that our suppliers comply with all laws and regulations of the countries in which they operate. In particular, laws that relate to anti-corruption, anti-slavery and anti-child working must be implicitly followed in spirit as well as to the letter.

Furthermore, in adherence to the UN Sustainable Development Goals - specifically Goal 8: "decent work and economic growth" and Goal 13 "climate action" - we must take steps to improve the sustainability and diversity of our supply chain in order to ensure positive social and environmental impact. Our Sustainable Procurement guidelines (outlined below) evidence our commitment to sustainability and set standards which all our suppliers should abide by as a condition for doing business with us.

The reputation of SUSE, the quality of our work-place experience, and the satisfaction of our obligations depends on each SUSE supplier achieving these levels of conduct and compliance with laws and regulation.

3. Scope

This policy applies to all SUSE suppliers globally, which in this context are defined as subcontractors, service providers, consultants, intermediaries and agents.

We expect all SUSE's suppliers to comply with the requirements outlined in this policy as a minimum. All applicable actions for the supplier will be communicated to the point of contact via email. This includes, but is not limited to, the supplier acknowledging that they have read and understood this policy.

4. Definitions

Term	Definition
Supplier	Any subcontractor, service provider, consultant, intermediary, or agent who provides goods or services to SUSE, either directly or indirectly. This includes any business or individual engaged by SUSE.
Supplier Code of Business Ethics (“Supplier COBE”)	A shared agreement between SUSE and its suppliers that outlines the expected behavior across areas such as labor rights, environmental practices, and ethical business conduct. It is designed to ensure suppliers meet consistent standards and to help SUSE improve traceability, reduce risk, and ensure regulatory compliance.
Conflict of Interest	A situation in which an individual's personal interests, including family, friendship, or financial ties, could compromise their professional judgment or actions in a way that harms SUSE's interests.
Sustainable Procurement	The practice of taking environmental, social, and ethical factors into account throughout the procurement process.
Environmental, Social, and Governance (“ESG”) Assessment	A screening process used to evaluate a supplier's performance and risk related to environmental, social, and governance factors. This may involve questions about a supplier's environmental policies and emissions reduction targets.
Bribery and Corruption	The act of offering, giving, or accepting payments, kickbacks, or other advantages that could improperly influence business decisions or secure an unfair advantage.
Antitrust Laws	Regulations designed to protect the rights of businesses to compete vigorously for the benefit of their customers by prohibiting anti-competitive agreements and behaviors.

5. Policy Statement

Diversity, Equity and Inclusion

SUSE expects all suppliers to comply with all applicable laws in providing their employees and applicants with equal employment opportunity without regard to an individual's race, colour, religion, gender, age, marital status, disability, national origin, veteran status, sexual orientation, or any other factor protected by law. We also expect that these policies are readily available for inspection. SUSE absolutely insists that our suppliers have robust policies covering diversity and inclusion, anti-bullying, and anti-harassment that go beyond what is provided for in law.

Choose Suppliers and Partners with Integrity

We respect our suppliers, partners and competitors and want to work or compete with them fairly. Price is very important, but it is not the only factor worth considering. Quality, service, reliability, and the terms and conditions of the proposed service can also make the difference and affect the final purchase decision.

Anti-Bribery and Anti-Corruption

SUSE expects that its suppliers take a strong stance against bribery and corruption, consistent with the anti-bribery and anti-corruption laws that exist in many countries around the world. As an absolute

minimum, suppliers must have policies that strictly prohibit bribes, fraudulent conduct, kickbacks, illegal payments, and any other offers that may inappropriately influence or secure an improper advantage with a government official, supplier or customer.

Antitrust Law and Fair Competition

Healthy competition and fair business practices benefit everyone by putting customers first and by giving them access to products and services at fair prices. As a supplier to SUSE, you should believe strongly in fair and open competition. As a result, antitrust laws are an important fact of everyday business.

We require that you are truthful and transparent in your interactions with SUSE, and you do not influence our decisions through taking unfair advantages through manipulation, concealment or misrepresentation of key facts, improper payments, or other unfair practices. Competing fairly ensures that we both meet our objectives and business strategy without losing our integrity.

You must comply strictly with all applicable antitrust and competition laws. These laws protect the rights of businesses to compete vigorously for the benefit of their customers. They prohibit anti-competitive agreements or understandings between competitors, restrict the behaviour of dominant companies, and require advance review or permission for mergers and acquisitions as well as other commercial arrangements that might affect competition.

Export Trade Compliance

Suppliers must comply with all applicable export control, re-export, and trade sanctions laws and regulations, including those administered by the U.S. Department of Commerce's Bureau of Industry and Security, the U.S. Department of the Treasury's Office of Foreign Assets Control, the European Union and its Member States, the United Kingdom, and the United Nations. Suppliers may not, directly or indirectly, do business with sanctioned countries, regions, entities, or individuals. They must screen all relevant parties, including beneficial owners, against applicable restricted-party lists before engagement and on an ongoing basis. Suppliers must also prevent diversion; accurately classify items and obtain licenses when required; follow deemed-export and technology-transfer rules; maintain required records; promptly escalate and address red flags, end-use or end-user concerns, and potential violations. Upon request, Suppliers will certify compliance and provide information reasonably necessary to enable SUSE to meet its own trade compliance obligations and regulatory inquiries.

Conflict of Interest

A conflict of interest occurs when an individual's personal interests – family, friendship, financial or social factors – could compromise their judgement, decisions or actions in the workplace to the detriment of SUSE.

Any conflict of interest between a supplier and SUSE should be immediately reported using our [online declaration form](#) and a log should be kept to ensure a fair and impartial relationship between SUSE and the supplier.

Environment, Health and Safety

Safety should be a primary concern of any SUSE supplier. You must be committed to providing a safe working environment for all who are involved in your company, including visitors. You must comply with occupational health, safety and environmental laws.

Sustainable Procurement

To realise our commitment to a sustainable supply chain, SUSE is undertaking an initiative to gain visibility for the suppliers that we work with and identify potential ESG risks.

Key suppliers will be requested to undergo an ESG assessment as part of their engagement with SUSE. Under this screening, the supplier will be asked:

- To share their environmental policy or sustainable procurement terms and conditions with us.

- Have you set emissions reduction targets? (Yes or No)
- Are the targets aligned with an independent body such as the Science Based Targets initiative?
- Please reshare your environmental policy or sustainable procurement requirements if and when they are updated in the future.

The supplier will be notified via email if this screening applies to them and further details. By conducting an ESG supplier risk assessment, SUSE can proactively address potential issues, drive improvements in its supply chain, and ultimately enhance its overall ESG performance and resilience.

6. What you need to do?

This Supplier COBE defines SUSE's basic requirements for business relationships with our suppliers and partners in alignment with our company values. We expect the commitment from our suppliers and partners to this policy. We do therefore request your confirmation that you read and understand this policy and respect the included commitments, which can be indicated via [this form](#).

7. Sanctions

All Suppliers are expected to adhere to SUSE's Supplier COBE. Failure to comply with these principles will result in the immediate review of the business relationship. Depending on the severity and nature of the non-compliance, sanctions may range from a mandatory corrective action plan and re-audits to the suspension of future orders, or, in severe cases, the immediate termination of the contract. The company reserves the right to pursue all available legal remedies and will report any illegal activities to the relevant authorities.

8. Roles and Responsibilities

Role	Responsibility
Environmental & Social Governance team	Responsible for conducting ESG reviews and assessments of suppliers to ensure alignment with SUSE's sustainable procurement goals.
Head of Procurement	Acts as the Policy Owner and is responsible for the overall management and implementation of the policy. The Head of Procurement also serves as the Policy Creator/Updater and is the main point of contact for any exceptions.
Risk & Compliance Committee	Responsible for reviewing and approving the policy to ensure it is suitable for publication and aligns with legal and compliance standards.
Supplier	Responsible for reviewing, understanding, and complying with all the requirements and commitments outlined in SUSE's Supplier COBE. Suppliers must adhere to all applicable laws and ethical standards.

9. Related Documentation

Document	Link
SUSE Supplier COBE Acknowledgement	SUSE Supplier COBE Confirmation - Form
SUSE Supplier Conflict of Interest Declaration	SUSE Supplier CoI Declaration

10. Policy Review

This Policy will be reviewed at least annually or as required by the Policy Owner in conjunction with any relevant departments, where necessary, to ensure the policy stays up to date with applicable laws and regulations.