

SUSE Code of Business Ethics (COBE)

Effective September 2025

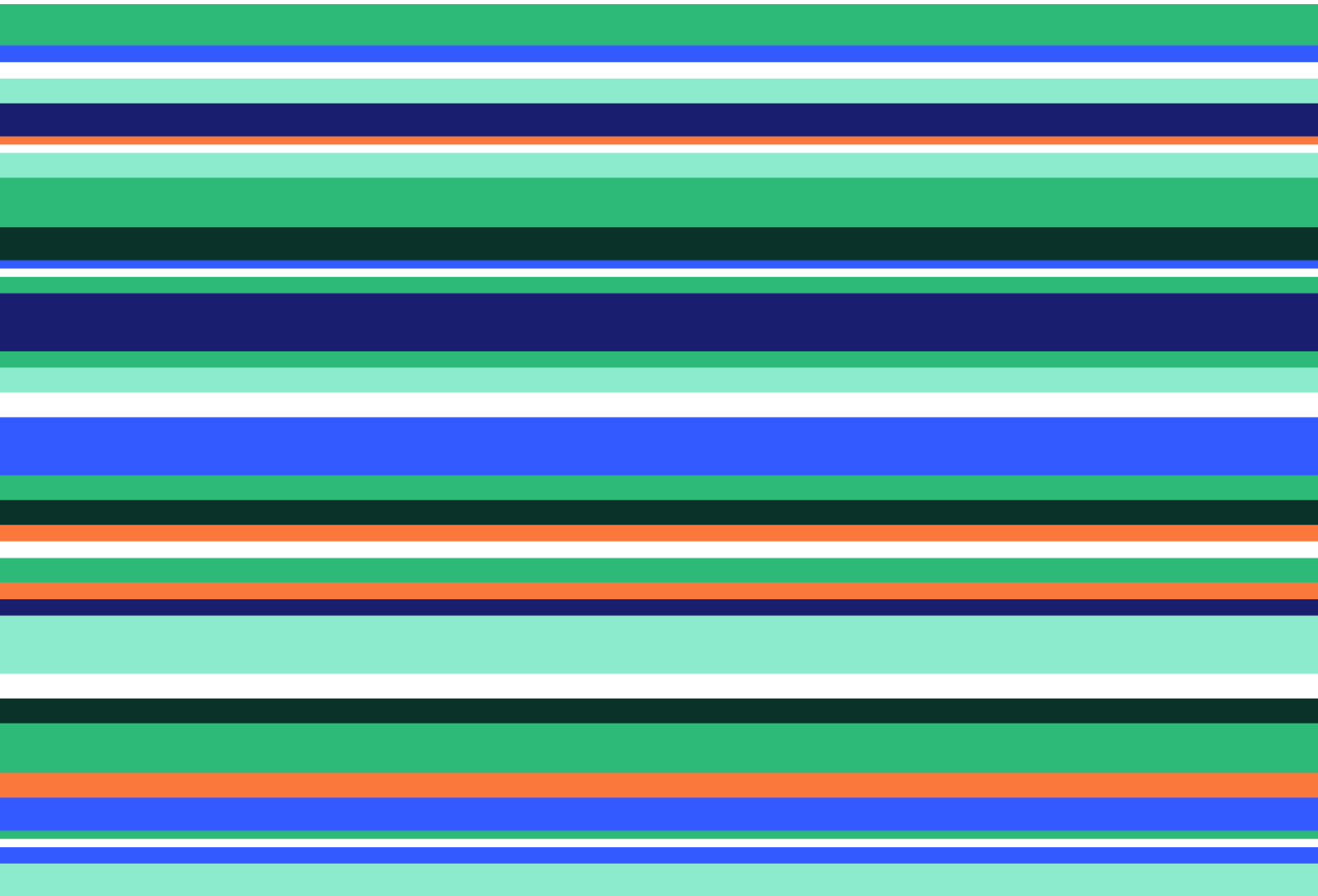


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This document is intended to provide policy, procedure, standards or guidance regarding SUSE. This document is reviewed at least annually to ensure validity.

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.

1. Introduction

SUSE's members at all levels - whether part-time or full-time, employees or contractors or freelancers, any agents and directors as well as our Board members at a management and supervisory level (together, "SUSE Members") represent SUSE to our stakeholders, especially our customers, suppliers, business partners and investors.

In each interaction with our stakeholders, we expect that we will all behave in a manner that reflects the highest standards of ethics, integrity and respect. As a SUSE Member, we expect you to perform with competency, dedication and excellence, giving your full attention to our business in a manner consistent with SUSE's Vision, Mission and Values.

SUSE strives to provide attractive products and services that meet the needs of our customers and partners worldwide. We never sacrifice long-term reputation and trust for a short-term benefit.

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 regardless of team, position, or location. Every SUSE Member is expected to be a role model and live the behaviours outlined in our corporate values every day as we engage with our customers, investors, business partners, suppliers, communities, and each other.

But not all situations we encounter are straightforward. When faced with a difficult decision or situation, our Code of Business Ethics ("COBE") will help us to make the best choice and navigate ethical dilemmas. We ask our SUSE Members to follow these steps:

- Pause** for a moment when the situation makes you uneasy and your instincts tell you something is not quite right. Consider how to approach the situation.
- Reflect** on your intended approach and think if the approach is consistent with SUSE's culture, corporate values and this COBE.
- Ask** additional questions and get help where necessary. Talk to your line manager or our Chief Legal Officer (andrew.mcdonald@suse.com).
- Report** concerns and stay alert. Pay attention to any activity that is inconsistent with this COBE, any other SUSE policies or the law.

2. SUSE Values

The guiding principles behind SUSE's decision-making and actions are our Values, which were developed by our SUSE Members. Our Values are [Choice | Innovation | Trust | Community](#).

Every SUSE Member is expected to embody these values in all their interactions, be it with one another, customers, communities, or stakeholders. Read more on our Values and their associated action statements [here](#).

3. Purpose

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. It is the responsibility of each SUSE Member to comply with the laws, rules and regulations that apply to them personally and to their status as a SUSE Member. These laws include, but are not limited to, federal and state laws relating to SUSE's business, including securities and exchange laws, antitrust laws, fair

trade practices laws, occupational safety laws, advertising laws, export laws, equal employment opportunity laws, fair credit practices laws, internet usage laws, privacy laws, and employment related laws.

The reputation of SUSE, the quality of our workplace experience and the satisfaction of our obligations depends on each SUSE Member achieving these levels of conduct and compliance with laws and regulation. SUSE has adopted this COBE to inform all SUSE Members of their legal and ethical obligations.

Adherence to this COBE will help to create and maintain an environment of trust and loyalty. It can also prevent violations that could expose SUSE, its employees, officers and directors to civil liability and/or criminal prosecution and penalties.

This COBE is not intended to catalogue every activity that may present questions regarding appropriate conduct or list every policy that may address those questions. Its purpose is to state basic principles and to provide guidance in areas that bear special emphasis.

SUSE Members are expected to adhere to this COBE and all approved corporate policies and procedures. Failure to do so can result in disciplinary action up to and including termination. SUSE must, and will, report all suspected criminal violations to the appropriate authorities for possible prosecution, and will investigate, address and report, as appropriate, non-criminal violations.

If any part of this COBE conflicts with local laws or regulations, only the sections of the COBE permitted by applicable laws and regulations will apply. Any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this COBE.

4. Scope

It does not matter where you work or what you do for SUSE – the COBE applies worldwide for SUSE Members. SUSE Members who do not comply with the expected standards of conduct and our COBE may be subject to disciplinary action.

All SUSE Members and any others subject to or who may become subject to the COBE, must acknowledge that they have read and agree to uphold the COBE. This is included as a requirement in the mandatory training course for all SUSE Members.

We expect that anyone who works on SUSE's behalf (including suppliers, consultants, contractors and other business partners) shares our commitment to integrity by following the key principles of our COBE when providing goods and services to SUSE or acting on our behalf. Suppliers, as a condition of working with SUSE, must comply with our Supplier Code of Business Ethics or have their own commitment to ethics and integrity consistent with the Supplier Code of Business Ethics.

For more information please reference our [Supplier Code of Business Ethics](#).

5. Policy Statement

Choice

Choose Suppliers and Partners with Integrity

We respect our suppliers, partners and competitors and want to work or compete with them fairly. The 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 decision.

It is unacceptable to share or use any confidential information about our suppliers, partners or our competitors. The same applies for confidential information belonging to any of SUSE's former SUSE Members. Whenever an opportunity arises to take advantage of confidential information, be aware of any conflict of interest. Do not use the information and, if necessary, consult with your line manager or our Chief Legal Officer (andrew.mcdonald@suse.com).

Freedom of Association

SUSE fully respects and supports the rights of employees to participate or not participate in employee representation bodies without fear of intimidation, pressure or reprisal.

Innovation

Employee Development

Nurturing, growing and retaining our talent sits at the heart of our People vision. SUSE Members at all levels of the business have the opportunity to progress their careers, through regular career planning discussions where support in achieving goals is provided.

We enable our team members to create effective development plans to drive their own growth, combining opportunities to grow through new experiences, through exposure to and learning from others and through appropriate education and learning relevant to their role, level and function.

Our leadership development framework enables our leaders to grow and our aspiring leaders to benefit from tailored learning to support their career goals.

We partner with external vendors to provide high quality external expertise in Growth Mindset development and leadership principles. We provide high quality online learning resources to fulfil skill development as well as mandatory training requirements.

Trust

High Standards of Business Conduct

SUSE strives to provide a working environment where Members are fairly treated, feel safe and can work without unnecessary distraction from other Members or from the outside.

We aspire to continue being an ethical business and expect SUSE Members to conduct themselves in

accordance with high standards of business conduct and help us to make good decisions and ethical choices to build trust between each of us and the people we interact with. Any behaviour that is unethical, illegal, dishonest, fraudulent, reckless, damaging, or disruptive to the conduct of business is undesirable and prohibited. Our commitment to the highest standards also helps us hire great people, build great products and attract loyal customers.

We are guided by our policies, procedures and practices that among others enable us to uphold human rights and labour standards and conduct our business activities fairly and transparently.

Zero Tolerance of Harassment

SUSE is committed to provide a work environment of inclusion where all SUSE Members are treated with dignity and respect.

Discriminatory bullying or harassing behaviour is not tolerated under any circumstances. SUSE Members have the right to be free from harassment on the job from visitors, customers, business affiliates, contractors, suppliers, temporary workers, co-workers and management. For more information, please reference our [Global Anti-Harassment and Anti-Bullying Policy](#).

Zero Tolerance of Violence

SUSE strongly condemns and prohibits acts or threats of violence against SUSE Members, customers, or other stakeholders.

Such acts include, but are not limited to: intimidating, harassing, threatening, or any hostile behaviour, physical abuse, vandalism, arson, sabotage, wilful destruction of property, use of weapons, as well as carrying weapons of any kind onto SUSE's property or while conducting company business.

Privacy, Security and Communications

Data protection – specifically the protection of personal data of our employees, customers and partners – is of particular importance to SUSE. Personal data may be collected or processed only where we have a valid lawful basis to do so.

Depending on your role, you may have access to information systems or tools that enable you to view certain information relating to customers, users, suppliers, business partners or other SUSE Members, which would otherwise not be visible to you without working at SUSE. These tools are important and necessary to enable you to perform your work effectively. However, it is of the utmost importance that all SUSE Members treat this data access with extreme sensitivity and caution. You are only authorized to access this data to the extent it is required for you to do your job. This data is confidential and subject to privacy protections in many jurisdictions. Our brand and the trust customers, employees, partners and communities put in SUSE depend on each SUSE Member's responsible use of tools that allow you to view information that would otherwise not be visible to you.

SUSE respects the personal privacy not only of its employees but also of the people we interact with. Online privacy and propriety in communications are mandatory. Therefore, SUSE has set up a Personal Information Management System (PIMS). For more information please reference our [PIMS Policies](#).

To support PIMS, SUSE has also established an Information Security Management System (ISMS) to protect all forms of information that SUSE holds, whether it is in soft or hard copy. For more information please reference our [ISMS Policies](#).

Anti-Bribery and Anti-Corruption

SUSE takes a strong stance against bribery and corruption consistent with the anti-bribery and anti-corruption laws that exist in many countries around the world. We demand the same from our business partners. We 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.

We comply with all anti-corruption laws of the countries in which SUSE does business, including the U.S. Foreign Corrupt Practices Act (FCPA), which applies globally. For more information please reference our [Anti-Bribery and Anti-Corruption Policy](#).

Antitrust Law and Fair Competition

Healthy competition and fair business practices put our customers first by giving them access to products and services at fair prices. We operate in a highly competitive environment, and we believe strongly in fair and open competition. As a result, antitrust laws are an important fact of everyday business life.

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

We 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 and 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.

Combat Criminal Activities

To protect SUSE's reputation and avoid criminal liability, it is important not to become associated with the criminal activities of others. We must ensure SUSE does not receive the proceeds of any criminal activities, as this can constitute a money laundering crime.

We must look out for any suspicions about actual or potential money laundering activities. Look out for warning signs like a supplier or business partner paying funds to a bank account in the name of a different third party or outside the country of their operation, one who takes payments in a form outside the normal terms of business, or splits payments to several bank accounts or overpays.

When engaging or contracting with third parties such as new suppliers and business partners, we must ensure that the third party in question is subject to screening to assess their identity and legitimacy before contracts are signed or transactions occur.

Conflicts of Interest

SUSE Members are expected to act in the best interests of SUSE while performing their duties and responsibilities. Therefore, they should attempt to avoid conflicts of interest.

The term "conflict of interest" describes any circumstance that could cast doubt on an SUSE Member's ability to act in a manner consistent with SUSE's best interests. SUSE Members must conduct themselves in a manner that avoids even the appearance of conflict between their personal interests and those of SUSE (potential conflict of interest).

Conflicts of interest arise in many ways and can result from financial or business interests or personal relationships. For example, a conflict of interest may occur when you or a family member receive a personal benefit as a result of your position with SUSE. A conflict may also arise from a personal relationship with a customer, supplier, competitor or business partner if that relationship impairs, or may be perceived to impair, your objective business judgement. Other areas of potential conflict of interest can be external business relationships, personal investments, employment outside of SUSE or serving on third-party boards, gifts and entertainment, corporate opportunities, and personal relationships with colleagues. For guidance on conflicts associated with outside employment, refer to section 5.3(e) of the [Anti-Bribery and Corruption Policy](#).

The best approach for any situation that might constitute a conflict of interest is to pause and not act until approval is granted. Ask yourself whether the action you are considering could create an incentive for you or appear to others to create an incentive for you. Could this benefit yourself, your friends or family, or an associated business at the expense of SUSE, even where this is indirect or minimal? If it is not possible to avoid participating in the activity that is creating the conflict, promptly disclose the potential conflict to your line manager and avoid participating in decisions that might raise the appearance of a conflict until you receive appropriate guidance or approval from your line manager or SUSE's Chief Legal Officer (andrew.mcdonald@suse.com).

Gifts and Entertainment

Gifts and Hospitality are often used during the course of business as a means to build goodwill and strengthen working relationships. Giving and receiving appropriate Gifts and Hospitality can be part of building and strengthening normal business relationships. However, Gifts or Hospitality (including entertainment) may create a Conflict of Interest or the perception of inappropriate business conduct.

Gifts and Hospitality should always be legitimate, with a business purpose and given for the goal of furthering a business relationship.

You must consider whether the giving or receiving of a Gift or Hospitality is appropriate, proportionate and reasonable. You must ensure they are offered and received openly and without any attempt to mislead or hide their nature, value, purpose, or identity of the giver and recipient.

Any forms of giving or receiving cash, cash equivalents (such as gift cards), lavish or extravagant Gifts or Hospitality, or any item that obligates you to provide something in return are strictly forbidden. Financial thresholds are set out in the [Gifts and Hospitality Policy](#), please consult with this policy before accepting any gift or courtesy.

Political Contributions

SUSE complies strictly with laws, rules, and regulations governing political activities, including political contributions.

Political contributions on behalf of SUSE or using company funds for political contributions are prohibited and require the prior written approval of the Chief Financial Officer (ian.halifax@suse.com) to override this prohibition.

Corporate Opportunities

Employees are not allowed to exploit or take advantage of business opportunities that are discovered using SUSE's property, information or position for personal gain.

Personal Investments

Personal investments in companies that are SUSE's competitors, major customers or business partners when the investment might cause, or appear to cause, you to act in a way that could harm SUSE are

prohibited.

Confidentiality

SUSE's success is dependent on our ability to bring ideas and innovations to market. Consequently, confidentiality is of paramount importance because it relates not only to what we have done or are doing now, but what we are planning to do in the future.

Therefore, every SUSE Member should be extremely careful about disclosing confidential or proprietary information and ensure outside communications do not disclose confidential or proprietary information or represent (or give the impression) that you are speaking on behalf of SUSE unless you are authorized to do so by SUSE. The same applies to communications with the press. Please refer to our [Communications Policy](#) for more detail.

All SUSE Members have a continuing obligation to protect confidential information concerning SUSE or its clients, partners, customers and competitors. We must also only obtain information about competitors in legal and ethical ways. Do not accept any information about a competitor that you believe has been obtained improperly.

We have an open and transparent culture, but we also refrain from sharing confidential information internally beyond those persons who legitimately need to know it for purposes of their job.

The obligation to protect SUSE's confidential information and trade secrets continues after leaving SUSE for any reason.

Public Disclosure and Communication

Many stakeholders rely on accurate, timely and comprehensible information to understand our business performance and where we are heading as a company, among them are institutional and individual investors and government regulatory agencies. Therefore, financial integrity is a core aspect of corporate professionalism.

Inaccurate financial reporting could undermine shareholder trust, impact our reputation and business success, and expose SUSE to fines and penalties. SUSE is committed to deliver accurate, transparent and timely annual reports and other external communications.

We are a company that conducts business in many countries. In all our dealings, we must keep clear, accurate and complete books and records that maintain the integrity of SUSE's financial reporting. This will not only strengthen our reputation with our stakeholders, but also support internal decision-making and external success.

For any internal and external communication, we expect SUSE Members to follow SUSE's [Communications Policy](#) and follow these communication guidelines:

- Act honestly, ethically and with integrity.
- Endeavor to ensure full, fair, timely, accurate and understandable disclosure of information to auditors, lenders and regulatory authorities.
- Act in good faith, responsibly, and with due care, competence and diligence without misrepresenting material facts or allowing your independent judgment to be subordinated by others.
- Proactively promote honest and ethical behaviour among peers in your work environment.

Respect of Human Rights

Consistent with our [Modern Slavery Statement](#), SUSE is committed to respecting human rights across our value chain, from our own SUSE Members to our supplier and business partners to the communities

in which we live and work. Child labour, human trafficking, and illegal, abusive or forced labour have no place in our operations or in the operations of our suppliers or business partners.

Environment, Health and Safety

SUSE is committed to providing a safe working environment for all SUSE Members and to comply with occupational health, safety and environmental laws. We take the integration of safety and health measures into each job task so that safety, health and job performance become inseparable. This can only be accomplished through the cooperative efforts of all of us as we seek to maintain an accident-free environment.

All SUSE Members are expected to follow all safety rules and practices, cooperate with officials who enforce these rules and practices, take necessary steps to protect themselves and other employees, attend required safety training, and immediately report all accidents, injuries and unsafe practices or conditions.

SUSE understands the environmental responsibility to preserve our planet for generations to come. We are committed to being responsible environmental stewards. Implicitly, our business model helps our customers address their carbon footprint by adopting cutting-edge IT solutions, and we remain committed to technologies that support our planet.

Contributing positively to the environment is of the utmost importance to our company. We strive to buy, sell and use environmentally friendly products and improve our own carbon footprint by reducing our carbon emissions progressing to our science-based emissions targets set for 2030. We encourage all business partners to share in our mission.

For more information, please reference our [Health & Safety Policy](#) and [Environmental Policy](#).

Protection of Intellectual Property

SUSE's intellectual property rights (our trademarks and logos, copyrights, know-how and patents) are valuable assets and unauthorized use can be detrimental to their value and even lead to their loss. Therefore, we must respect all copyright and other intellectual property laws. We must never use SUSE's logos or other protected information or property without pre-clearance from our Product & Marketing team. Please report any suspected misuse of trademarks, logos, or other SUSE intellectual property to our Chief Legal Officer (andrew.mcdonald@suse.com).

Likewise, we respect the intellectual property rights of others. SUSE is committed to open source software collaboration and development, so that we strictly comply with the license requirements under which open source software is distributed. Inappropriate use of others' intellectual property may expose SUSE to legal claims, criminal and civil fines and penalties, as well as significant damage to SUSE's reputation and its standing in the open source community.

Community

Diversity, Equity and Inclusion

We dare to be different, think different, find purpose and be the difference every day. SUSE strongly believes that we work better together because of our differences and our unique abilities, strengths and differences. We are dedicated to fostering a diverse and inclusive workplace where SUSE Members are treated fairly, flourish and grow both personally and professionally. We do this by providing spaces for SUSE Members to belong, opportunities to learn and lead, and avenues to give back to our communities and society at large.

We promote diversity not only just for each other, but also for our customers, suppliers and all others with whom we interact. That makes us stronger for attracting, developing and retaining talented and highly qualified individuals who represent the diverse strengths of our community.

We comply with all applicable laws in providing SUSE Members and job applicants with equal employment opportunity without regard to an individual's age, disability, marital status, pregnancy and parental leave, race (including colour, nationality, ethnic or national origin), religion or religious beliefs, sex or gender; gender transition or expression, sexual orientation, working pattern (fixed or part-time), neurodivergent conditions, social class, or any other factor protected by applicable laws and regulations in countries where we employ staff. Our decisions and criteria governing the relationship with all employees and other SUSE Members are non-discriminatory, based on job requirements, and an individual's skills, experience, and compliance with company policies and values. Our policy applies to all employment terms and conditions, including but not limited to hiring, placement, promotion, demotion, transfer, compensation, benefits, training, lay-offs and termination.

Further, it is the policy of SUSE to make reasonable accommodation for the employment of persons with disabilities. For more information please reference our [Diversity, Equity & Inclusion Policy](#).

SUSE Communities

At the heart of SUSE's ambition to leverage "the power of many" and "innovate everywhere" is an unwavering commitment to collaborative and purpose-driven results. Due to our commitment to open source software development, the open source communities are essential to our corporate success. We embrace our global communities by listening and debating and having an open mind to deliver and give back every day.

As the largest independent enterprise open source company, we also recognize the positive contributions that our resources can and do make to society. Consequently, we aim to continuously live out our open source ethos by creating shared value for SUSE and the communities we touch, dedicating portions of our revenue, our technology and our people's time for philanthropic causes.

Living and acting according to our SUSE values and our COBE help us to ensure to maintain and foster our reputation in the communities. Any breach has the potential to endanger what we stand for.

Social Media

Social media is an important tool for the establishment of our company's brand. Social media includes any digital communication channels that allow individuals to create and share content and post comments, e.g. blogs, wikis, social networks and virtual worlds.

Every SUSE Member is welcome to participate in social media, following one overall goal: to participate online in a respectful, accurate, meaningful and legal manner in accordance with our SUSE values as well as with the legal rules and standards applicable for companies like SUSE.

This is applicable to any communications, whether work related, personal or otherwise, that may impact SUSE. The impact on SUSE is typically greater on social media platforms where you are identifiable as a SUSE employee (for example, LinkedIn) and where it is common to post on both non work and work related topics. In personal activities on social media, we should be respectful and recognize that our conduct may impact the way others view who we are and what we stand for as a company. For more information, please reference our [Communications Policy](#).

6. What you need to do

Report Concerns

SUSE expects all of its SUSE Members - whether Board Members, the Management Leadership Team, other executives or employees - to behave in accordance with the COBE. Integrity inspires our work, strengthens our reputation and is an essential part of our success.

The principles and standards in SUSE's COBE are necessarily general in nature. From time to time, questions might arise as to whether a particular course of conduct violates our COBE or any other company policy. Your line manager is your first point of contact for questions about the application of the COBE and our policies in your daily work. All employees are encouraged to discuss questions openly. The HR and the Legal department are also available to help evaluate a course of conduct or understand a particular law, regulation or policy.

If you think that something might be wrong at work or you saw or heard something that may violate our COBE, our policies or the law, do not ignore it. You have the responsibility to prevent harm to SUSE and its reputation and share your concerns by reporting right away, even if you are not sure that a violation has occurred. We also encourage our customers, partners, suppliers to report any concerns.

We take every report and every potential violation seriously and will investigate it thoroughly and as confidentially as possible. Such behavior damages SUSE by creating an unnecessary risk of criminal prosecution or of civil liability and by tarnishing SUSE's reputation. This can have a profoundly adverse effect on the livelihood and safety of all employees.

If an internal investigation determines that the COBE, a company policy or the law has been violated, SUSE will determine a fair and consistent disciplinary action in accordance with applicable law that matches the nature and circumstances of the violation. Disciplinary actions could include suspension without pay, loss of merit increases or annual incentives, and termination of employment. If an act violates the law, it could result in fines or criminal prosecution.

Speaking Up Protection

Reporting known or suspected violations is a sensitive issue. If you give your name, we will do all we can to protect your identity consistent with conducting a thorough investigation.

Under no circumstances will any SUSE Member be subject to disciplinary or retaliatory action solely as a result of making a good faith report of a violation or potential violation.

- SUSE also actively advocates the protection of its SUSE Members, from any adverse or harmful action, threatening, harassing or otherwise discriminating for: Providing information to or assisting in an investigation conducted by a federal regulatory or law enforcement agency or similar.
- Filing, testifying or participating in any legal proceeding relating to an alleged violation of the laws described above.
- Providing to a law enforcement officer any truthful information relating to the commission or possible commission of a violation of law.
- Reporting known or suspected violations of any company policy to your manager, the Chief Legal Officer (andrew.mcdonald@suse.com), the Chief People Officer (lisa.sherwell@suse.com) or other reporting channel put in place by SUSE, including the Safecall platform, our independent reporting line.

As much as we encourage honest reporting, SUSE does not tolerate knowingly false reports, lies to investigators or refusal to cooperate in an investigation.

For further information, please reference our [Speaking Up Policy](#).

7. Policy Review

This policy should be reviewed annually by the Legal Team in conjunction with any relevant departments.