



VERTIV ETHICS POLICY

Vertiv is proud of its long-standing policy of adhering to the highest ethical standards in dealing with customers, representatives, employees, and government agencies. We believe our contractors, distributors, representatives, and agents enjoy that reputation and share in our desire to maintain it.

We therefore want to remind you that we expect all people and organizations with whom we contract to maintain the highest ethical standards. You should take care to avoid any conduct that could reasonably appear to be improper or might damage Vertiv's reputation for honesty and integrity. In particular, we expect you to adhere to the principles set forth below while engaged to assist or render services for or on behalf of Vertiv:

1. Compliance with Laws, Rules, and Regulations

You must operate in full compliance with the laws of your country and the countries in which you operate, and with all other applicable laws, rules, and regulations. This includes, but is not limited to, applicable United States export control laws and regulations, as well as applicable laws of other countries.

2. Anti-Corruption

Corruption, extortion, and/or embezzlement is strictly prohibited. You must not pay or accept bribes or participate in other illegal inducements in business or government relationships. You must comply with all applicable anti-corruption laws, including without limitation the United States Foreign Corrupt Practices Act. Gifts, for whatever reason, are discouraged. You should not use any funds or assets to assist any candidate or nominee to gain political office, or to assist any political parties or committees generally, unless permitted by law and, if required, approved in advance by the relevant authorities.

3. Fair Competition

You must comply with all applicable antitrust and fair competition laws. You should not enter into any understanding, agreement, or plan, express or implied, formal or informal, written or oral, with a competitor with regard to prices, terms, or conditions of sale or service, production, distribution, territories, or customers. You should not exchange or discuss with a competitor prices, terms, or conditions of sale or service, or other competitive information, or engage in any other conduct that violates any applicable law.

4. Boycotts

United States antiboycott laws and regulations prohibit Vertiv entities, whether based in the United States or outside the United States, from complying with a request to support, give effect to, or comply with a boycott of any country that is contrary to the laws or policies of the United States. Vertiv must reject any such request and, in some cases, is required to report receipt of the request to the relevant government agency. You should not ask Vertiv or any of its employees to participate in such boycotts.

5. Conflict of Interest

You should disclose to Vertiv any personal, business, or financial interest that may arise that is incompatible with the loyalty and responsibility you owe to Vertiv.

6. Proprietary Data

You should take reasonable precautions to protect the confidentiality of Vertiv's proprietary data and deal with them in accordance with any agreements concerning their use or disclosure.



7. Personal Data

You should treat personal data in compliance with applicable data protection laws and any other applicable laws, rules, or regulations.

8. Human Rights

You should operate with reasonable working hours to maintain a positive and productive work environment consistent with commonly accepted practices in each locale. Vertiv opposes any form of forced, bonded, or indentured labor, or involuntary prison work. You should comply with all applicable wage laws, including those relating to minimum wages, overtime compensation, and legally mandated benefits. You should provide a workplace free of harassment and discrimination. Discrimination by reason of age, race, color, religion, creed, sex, pregnancy status (including childbirth, breastfeeding, or related medical conditions), marital status, sexual orientation, gender identity / expression (including transgender status or sexual stereotypes), genetic information, citizenship status, national origin, protected veteran status, political affiliation, or disability, or any other factor made unlawful by applicable laws and regulations, is not condoned. You should comply with all applicable laws and regulations that apply to your operations, including those concerning health, safety, and environment.

In addition to complying with the principles above, we also ask that you inform us if you feel any of our employees have asked you to violate any of such principles or the ethical standards or laws of any jurisdiction in which we or you do business.

We appreciate your ongoing vigilance in helping us maintain the highest ethical standards and reputation of Vertiv.