



Code of Ethics

And Business Conduct

A letter from our CEO and President

Mike Thomson

We are committed to creating a culture where associates challenge themselves, each other, and clients to push beyond the status quo, power progress, and win in the market. The only way we can reach any of these goals is by operating our company in keeping with our foundational values including integrity.

As you read our Code of Ethics, I hope you'll see it as more than just a document. Our Code is a living representation of who we are and how we operate, and it applies to everyone at Unisys, from entry-level associates to senior leadership. It's not just a set of rules to be reviewed and filed away but a reflection of our culture and baked into our DNA. It can help you navigate complex decisions with confidence and clarity. This includes how we show up to work together and how we show up in the market.

We are all responsible for nurturing a respectful workplace. This charge encompasses our commitment to making ethical decisions, speaking up when something does not feel right, and inclusivity. We do not tolerate harassment or discrimination of any kind. Rest assured; we have zero tolerance for retaliation against those who come forward.

Serving clients in more than 120 countries worldwide, we must compete fairly, exercise good judgment, and avoid conflicts of interest.

In all of these situations, each of us is responsible for protecting confidential information and operating in compliance with laws and regulations.

As we push ourselves and each other to create value for our clients, we must remember that our reputation for integrity is our most valuable asset. By adhering to our Code, we not only protect our company but also contribute to a workplace we can all be proud of.



Mike Thomson
Chief Executive Officer and President



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Our Values and Heritage

Unisys is a global technology solutions company that, for more than 150 years, has been dedicated to helping people and organizations reach the next breakthrough. And the one after that.

Across regions, industries and contexts, we apply specialized expertise and advanced technologies to strengthen and transform teams and processes. We change how people experience technology and help organizations act upon new opportunities through digital workplace, cloud, applications, enterprise computing and business process solutions.

How do we do it? **We create a winning culture where associates challenge themselves and each other to unlock potential.** We are anchored by **Integrity, Respect, and Client Focus** in everything we do, ensuring we deliver on our Winning Culture behaviors every day:

Explore: We tap into our innate curiosity to build new skills.

Experiment: We reimagine the status quo.

Act with agility: We identify opportunities for action.

Take ownership: We operate with accountability to foster trust and power progress.

For a detailed Values and Heritage page, please refer to [Company History](#).



Celebrated 150 years of breaking barriers with innovative technology that transforms organisations.

Gwendolyn Lee Hassan

Vice President, Chief Compliance Officer

Our Code sets out our fundamental principles across a wide range of risk areas, why they are important and what is expected from all of us to manage those risks. Although we follow local laws and regulations when they set a higher standard than our Code, you should consider this document the first step on a pathway that begins with asking the right question and finding the right answer to guide your business decisions and actions.

In each section, look for the icons with links to more guidance: related policies, frequently asked questions and other resources.



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The Ethics & Compliance Office is also at your disposal, whether you contact us directly or via the Helpline. You will find contact details at the end of this Code, or via the Helpline icon on the tool bar.



Leaders, you will find additional expectations associated with your elevated responsibilities in the organization. Ethical leadership is a key contributor to an ethical culture; we cannot do it without your active involvement. Look for the blue boxes and this symbol for more information:



Speak up – ask questions – get answers – take the right course of action.



Gwendolyn Lee Hassan
Vice President, Chief Compliance Officer

Integrity Is in Our Code

We are **honest** in
all our dealings
and stand for
what is right.





Every Associate's Responsibility

Compliance. Ethics. Integrity. These are all just words unless every associate at Unisys owns and accepts accountability for them. As a Unisys associate or Board member you are expected to comply with our Code, with Unisys policies and procedures, and with the law.

Associates and Board members must:

- Read, understand, and commit to act in compliance with our Code and the policies, laws and regulations that apply to your job.
- Be honest and transparent in all of your work for Unisys.
- Speak up when you observe, learn about or suspect violations of our Code or related policies.
- Cooperate in any internal investigations.
- Complete all assigned mandatory training on ethics and compliance issues.





Every Leader's Responsibility

As a Unisys leader, you are held to an even higher standard, and you have a special responsibility to lead with integrity. You must model ethical behavior and take active measures to make certain your team does, too. If you communicate and listen to your team and handle concerns and different opinions with ethical compassion and understanding, you will build trust, promote productivity and protect the company.

Leaders are expected to understand the risks associated with their organization's business activities and actively seek to mitigate them. These risks arise from the global nature of our business and include areas covered in our Code. Your comprehensive understanding will enable you and your team to take actions that minimize those risks and contribute to overall success.

Leaders must:

- Identify the risks relevant to your work, regularly discuss them with your team and implement mitigation measures.
- Clearly communicate and demonstrate that efforts to win business must never be compromised by unethical or illegal actions, even if it means losing a business opportunity.
- Complete your compliance training on time, and make sure your team does, too.
- Be approachable – make sure your team knows that you will listen and that they can ask questions and raise concerns without fear of retaliation.
- Know how to identify and manage suspected misconduct – refer the matter to the Ethics & Compliance Office for investigation, and do not attempt to investigate or resolve the issue yourself.



Our Code

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Making Ethical Decisions

Creating a culture of integrity starts with making good decisions. Ask yourself these questions before taking actions that might compromise our Code and our commitment to conducting our business with integrity:

Making ethical decisions and good choices builds a culture of integrity and a place we all want to work. When we act with integrity, we build trust with each other, our clients and our business partners. When faced with an ethical dilemma or difficult decision, ask yourself the following questions. When in doubt, seek guidance.



Leaders must also seek guidance from the Ethics & Compliance Office or the Legal Department when confronted with an ethical issue on their team.

If YES to ALL, it's probably OK to proceed.

If NO to ANY, it's NOT OK to proceed.

Are my actions consistent with our Code, our policies and the law?

NO



YES ▼

Would I be comfortable if my actions were public and my leader, co-workers, family and friends knew about them?

NO



YES ▼

Are my actions in the best interests of Unisys, our reputation and advancing our business interests?

NO



YES ▼





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Working with Third Parties

If you regularly supervise, manage or interact with third parties, whether they are consultants, sub-contractors, suppliers, contracted and contingent workforce, or anyone working on our behalf, you should be familiar with our Business Partner Code of Conduct.

Associates must:

- Ensure that third parties receive, acknowledge and follow the Business Partner Code of Conduct.
- Give third parties opportunities to ask questions and raise concerns that help them stay in compliance with that Code, including using the Unisys Helpline.
- Report any suspected violations of our Business Partner Code of Conduct to the Ethics & Compliance Office.

Can I answer "NO" to all questions in the decision tree?

Has the third party requested upfront payments?

YES → STOP

NO ▼

Has the third party requested excessive compensation for the work involved?

YES → STOP

NO ▼

Has the third party provided different entities, entity names, or locations for billing?

YES → STOP

NO ▼

Has the third party requested to use a specific individual, organization, or representative for the work or bidding process?

YES → STOP

NO ▼

Has the third party refused to agree to our Business Partner Code of Conduct or other compliance terms and conditions?

YES → STOP

NO ▼

Has the third party claimed to have a special agreement or arrangement with the client or the potential client?

YES → STOP

NO ▼

Has the third party reported family or business relationships with the client or potential client?

YES → STOP

NO ▼

Has the third party had a history of illegal or questionable behavior discovered in due diligence?

YES → STOP

NO ▼

OK



Policy



Resource



Integrity in our Workplace

We **value** one another by
treating everyone with
dignity and respect.



Respectful Workplace

We foster a business environment where we value all perspectives and treat our associates, clients and business partners with dignity and respect. We work better together because of our differences, not despite them. We hire and promote associates without regard to age, race, nationality, gender, pregnancy, disability, sexual orientation, religion, veteran status, marital status, citizenship or other protected classes.

Unisys maintains a respectful, healthy and safe work environment so we can all be productive, creative and successful. Each of us is responsible for championing a work environment that is free from discrimination, harassment and hostile behavior. Offensive, unprofessional, inappropriate or unsafe behavior has no place at Unisys.

Associates must:

- Create and maintain a respectful workplace.
- Engage in active listening; foster open discussions and the free expression of ideas.
- Acknowledge that our differences are an advantage to solving business challenges.
- Report any acts or threats of violence to the Global Security Operations Center or the Helpline.
- Comply with workplace safety regulations, and report any accident or injury sustained on the job to your leader or Human Resources.
- Never work impaired by drugs or alcohol.

How to get help if you believe our respectful workplace standards and expectations have not been upheld.

Seek advice and raise any concerns regarding Sexual Harassment, Harassment, Discrimination, Retaliation, Bullying or Mistreatment directly to: your leader, Associate Relations, Human Resources, Ethics & Compliance, Legal or the Unisys helpline.



What is Bullying?

Bullying is a type of conduct that may or may not be unlawful depending on local law but violates the Unisys Respectful Workplace Policy. Workplace bullying is mistreatment that is considered abusive based on the severity, nature, and frequency of the behavior. Bullying includes but is not limited to: repeatedly making derogatory or insulting remarks or mocking or making fun of someone; using an associate's known physical or psychological disability against them; serious or repeated verbal or physical conduct that could reasonably be considered threatening, intimidating or humiliating; intentionally isolating someone, or sabotaging and undermining their work performance.

Communications with an associate will not be considered bullying solely because they contain criticism or negative feedback. Conduct is not bullying if it is a legitimate, critical performance assessment provided in a respectful and professional manner.




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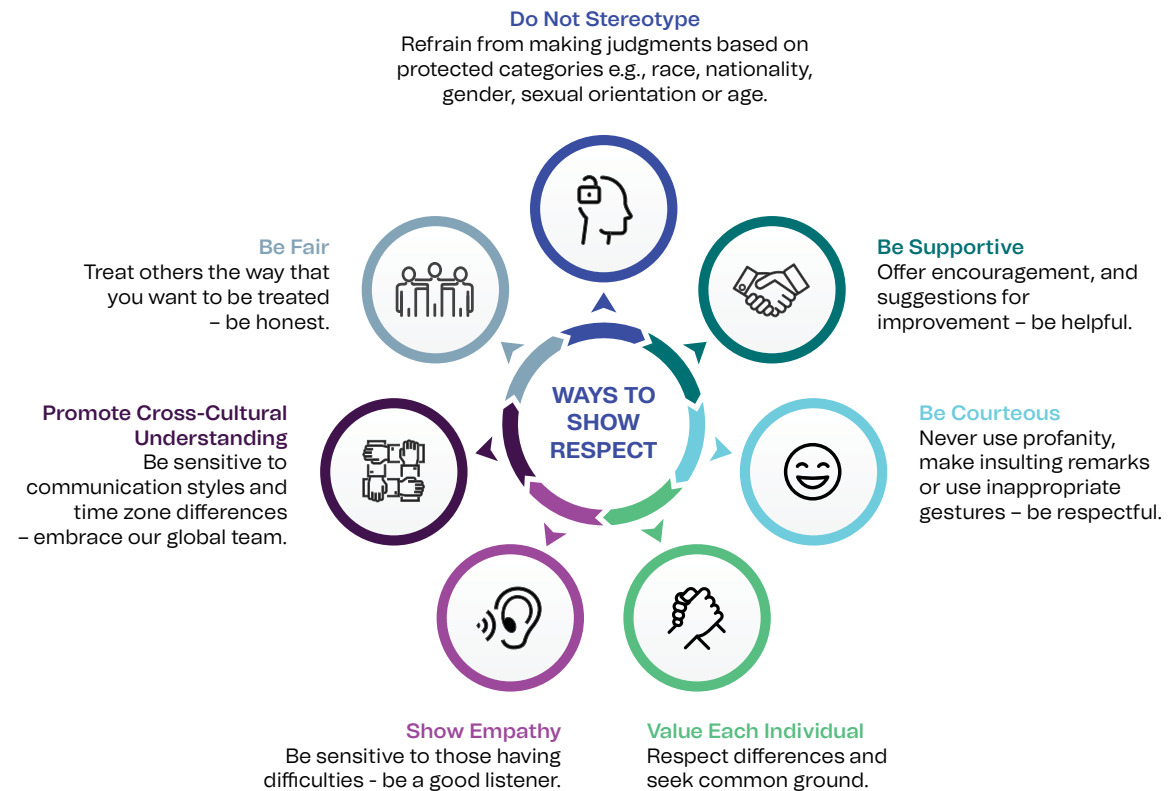
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Respectful Workplace



What Harassment Looks Like

Sexual Harassment

May include unwelcome touching, advances, obscene gestures.



Sexually offensive remarks, conversation, jokes, whistling, repeated invitations for dates despite refusals.

Requests, threats or demands for sexual favors in exchange for continued employment or promotions.



Visual images, verbal or electronic communications that are sexual in nature.

Taking work away or allocating more work, more difficult tasks or more shifts after a refusal of sexual advance.



Harassment

May include assault or threats of violence.



Derogatory remarks, joking, teasing and commenting about sensitive and/or controversial subjects.



Requests, threats or demands in exchange for continued employment or promotions or to avoid negative consequence.



Visual images that are demeaning or discriminatory.



Allocating more work, more difficult tasks or more shifts and exclusion from meetings and team activities.





Integrity in Our Business Dealings

We are **accountable** for
our actions and honor our
commitments.

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Compete Fairly

Unisys competes in the world marketplace vigorously but fairly. We do not engage in unfair or anti-competitive behavior, nor do we make untruthful statements about our products and services or those of our competitors.

There are laws designed to promote competition in the marketplace. They provide a fair landscape for companies to compete, whether with each other or in the supply chain, and offer consumers a choice. These laws prohibit activities such as bid rigging, price fixing, dividing or allocating market segments or territories and any interaction with competitors that might be seen to limit competition. Even making informal arrangements or sharing information about our products and services with competitors can violate these laws.

Associates must:

- Avoid any formal or informal agreements with competitors that may appear to limit competition.
- Respect competitive bidding processes and be transparent if there are conflicts or other issues that might be viewed as interference.
- Limit contact with our competitors, immediately end any discussions regarding pricing or other inappropriate matters and report incidents to the Legal Department.
- Avoid dictating the prices that our independent partners charge their customers.
- Source competitive intelligence appropriately, honestly and transparently. If you gain access to confidential information from a competitor, contact the Legal Department.



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Improper Payments and Benefits, Bribery and Corruption

At Unisys, we are transparent in our interactions with our business partners, and we do not influence their decisions by offering or making bribes or improper payments, promises or other arrangements. In addition to betraying our commitment to conduct our business with integrity, these actions violate national and international laws and may be a serious criminal offense for companies and individuals.

Unisys strictly prohibits offering, promising or giving anything of value to a government official or to a business partner with the intent to keep or get business, influence a business decision or action, or for any other improper purpose. The third parties we engage are also prohibited from such activities; others cannot bribe on our behalf. We cannot make cash payments, promises of some future benefit or discounting or kickback arrangements, all of which may be considered a bribe or other corrupt action.

National and other laws define who are government officials. They may include employees or officers of government institutions, as well as employees of state-owned companies or public international organizations.

Associates must:

- Be able to identify whether a business partner or other third party may be considered a government official.
- Work only with third parties, agents, consultants and advisors who have undergone due diligence and who include best practices in compensation and other contract terms.
- Offer a gift, hospitality or travel courtesy that is reasonable, and appropriate.
- Take actions such as making charitable donations, hiring employees or engaging third parties only during the normal course of business, not as part of an exchange for a favor.
- Accurately describe payments or expenses in our books and records.



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Offering or Accepting Business Courtesies

Gifts, meals or other courtesies are an important part of developing goodwill, and they can play a role in enhancing business relationships. If they are or could be considered lavish or inappropriate, if they lack transparency or if they are unrelated to a legitimate business purpose, however, they may cause concern about corruption and even be characterized as bribes, which can lead to legal consequences for the individual and/or Unisys.

Exercising good judgment and moderation is critical for ensuring that business courtesies are appropriate and within established limits. Associates must make sure that they do not violate Unisys policies or those of the intended recipient's organization.

Associates must:

- Check any restrictions in the organization of the intended recipient before offering a business courtesy.
- Learn and follow the limits set out in the Gifts & Entertainment Policy.
- Obtain prior approvals where required, particularly before offering a business courtesy to a government official or any public sector client.
- Ensure a business courtesy is appropriate to the occasion and business relationship. Branded Unisys items are preferable to an unbranded gift.
- Keep track of and limit the cumulative value of business courtesies offered to a single individual over the course of the year.
- Politely refuse or return anything that violates our Code or policies.



Leaders must also closely monitor the business courtesies expenses that you approve and ask questions when you are unsure whether an expense is within policy limits.



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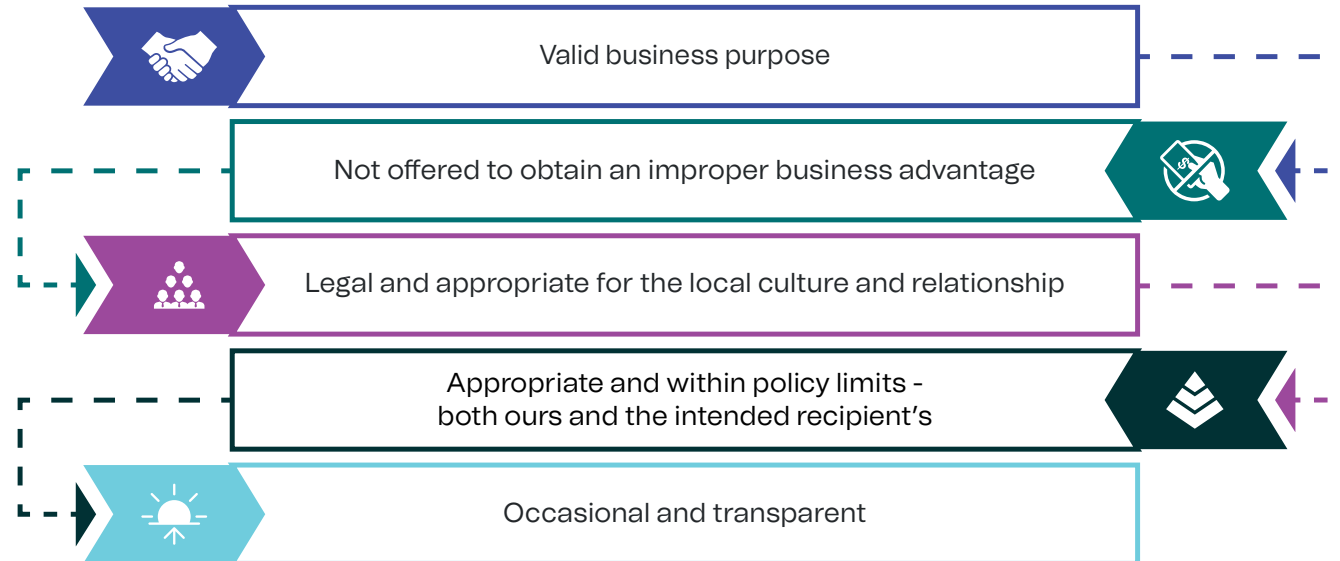
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Navigating Business Courtesies

Exchanging business courtesies with our clients, partners and suppliers can build goodwill and strengthen relationships if done with respect. Follow these tips to respect the laws and the rules applicable for most companies.



MAY I KEEP IT? YES, you may accept gifts as long as they are not intended to influence your business judgment and they comply with our policy and guidelines. They must be of nominal value, appropriate and infrequent. You may never accept cash or a cash equivalents including gift cards. You may accept reimbursement for lodging or travel expenses ONLY with approval from your leader and the Ethics & Compliance Office.



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Conflicts of Interest

Sometimes our personal interests and the interests of Unisys can come into conflict. It is important that all associates avoid even the appearance of a conflict between their personal interests and Unisys' interests.

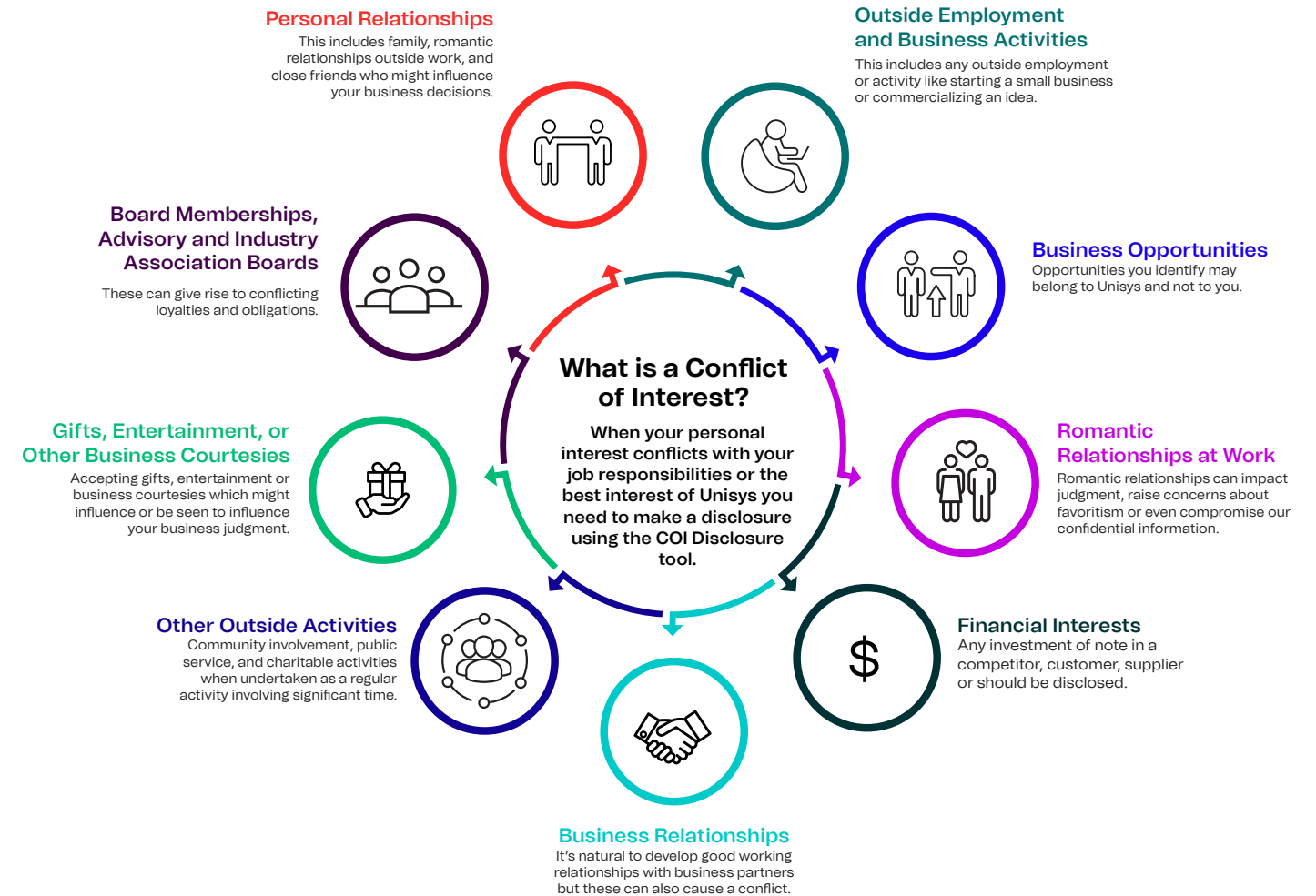
Potential conflict situations do arise and are not automatically evidence of wrongdoing. In most cases, when potential conflicts are disclosed promptly, they can be resolved with little or no further action. Associate disclosure allows us to navigate the situation together in a way that protects both the associate and the company, while being as transparent as possible about our business dealings.

Associates must:

- Be able to identify a conflict of interest as it arises.
- Avoid conflicts where possible.
- Promptly (and in advance, where possible) disclose a potential conflict to obtain clearance from the Ethics & Compliance Office and approval from your leader.
- Manage and follow any conditions related to a cleared conflict.



Leaders must also understand the criteria for approving a conflict of interest and monitor any cleared conflicts which may have an impact on performance.





Fraud

It is never acceptable to take any part, no matter how small your role, in any activity that involves theft, fraud, embezzlement, extortion or misappropriation of property. You participate in a fraud any time you help conceal, alter, falsify or omit information in Unisys records either for your benefit or at the direction of any others.

Associates must:

- Refuse to engage in any questionable activities
- Promptly report any suspected fraudulent activities



Integrity with Assets and Information

We **safeguard** assets and
information, whether belonging
to Unisys or others.





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Use of Unisys

Property and Resources

Unisys property and resources are intended to help associates achieve business objectives. Associates must protect and use company property and resources responsibly and honestly. Unisys does not tolerate careless, inefficient, fraudulent or illegal use of company property or resources, including budgeted funds and time.

Company-provided devices and access to systems are for Unisys business only and should never be used for illegal activities, gambling, viewing or sending obscene, hateful or disrespectful material or images, or uploading or downloading software that is copyright protected or subject to export controls.

Associates must:

- Spend Unisys funds wisely, as if they were your own, guard against waste and abuse.
- Be honest and accurate in your time and expense reporting.
- Be alert to situations or incidents that could lead to the loss, misuse or theft of company resources or property.
- Use Unisys resources, like company computer equipment, phones and internet systems, only for legitimate Unisys business activities.



Leaders must also be accountable for their team's proper management and use of company assets and should carefully review expense reports, asset allocation and management.



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Confidential Information

And Intellectual Property

Unisys information, trade secrets and intellectual property are valuable assets that demand protection. We could lose our competitive advantage if our confidential information is disclosed outside of the company. We must also respect the confidential information and intellectual property of others. This includes protecting information our business partners share with us. Safeguarding information and ideas, whether our own or those of others, is crucial to our business success and our reputation as a trusted partner.

Associates must:

- Never discuss confidential information in public spaces and share it only with those who are authorized or need to know it.
- Use confidential information only for Unisys business, and maintain confidentiality even when your employment with Unisys ends.
- Secure Unisys intellectual property rights through copyrights, trademarks and other forms of intellectual property to protect the value of our innovation.
- Protect confidential information by using correct classification, encryption and other methods.
- Do not solicit or use the confidential information or intellectual property of others without license or permission.



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Personal Data

The appropriate use and protection of personal data is critical to Unisys, whether the data belongs to our associates or is entrusted to us by our clients, business partners and other third parties. Maintaining the integrity and confidentiality of personal data that we collect, process, store and transfer is how we build and maintain the trust that is essential to the way we conduct our business activities.

We operate using established principles to embed “privacy by design” into our operations, products and services.

Associates must:

- Identify the information in your business activities that is considered personal data, learn the requirements for its use or management and allow access only to those who need to know.
- Provide clear and accurate privacy notices when collecting or processing personal data.
- Collect, use and share only the data that is needed for a specified business purpose.
- Apply appropriate records management rules for the storage and destruction of the data.
- Incorporate privacy considerations in the design or planning of any solution or project.



Leaders must also collaborate with the Privacy Office to keep current on privacy developments related to their work and to identify areas that may require input or support.



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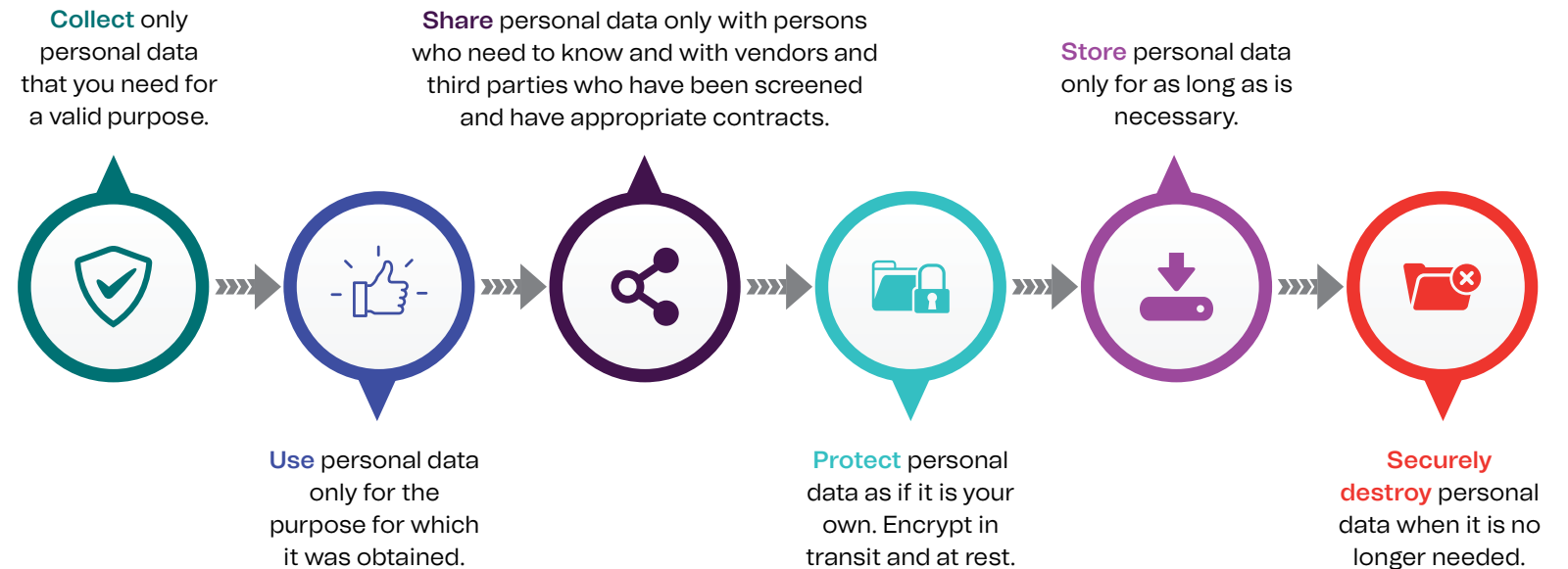


Data Privacy Principles

While the global regulatory environment for data privacy is constantly evolving, there are some fundamental principles that apply regardless.

You have a responsibility to protect the personal data of our clients and associates. Our clients take privacy very seriously, and so does Unisys.

Follow these data principles:



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Records Management

Unisys records, including any written, printed or electronic data, are a valuable company resource, whether they are structured or unstructured. Unisys records must be managed and controlled throughout their life cycle according to our policies, procedures and retention schedules. Records created or collected by Unisys associates are Unisys property and should be respected and managed accordingly.

Associates must:

- Keep records only as long as needed for business purposes, then destroy or archive them according to our Global Records Retention Schedule (GRRS). Refer to the GRRS to determine retention based on the type of record and jurisdiction (location).
- Safeguard confidential information by marking it appropriately, encrypting it, or storing it securely when necessary. Utilize InfoSec Std1.6 Data Classification to correctly classify information and refer to the information lifecycle for guidance on proper handling throughout the record's existence.
- Preserve records that are subject to a "legal hold" or part of an investigation.
- Take responsibility and regularly review the records you create to ensure compliance. Reference the information lifecycle to understand the steps from creation to disposition. If in doubt, refer to our Global Records Retention Schedule (GRRS) for guidance.



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Accurate Financial, Costs and Timekeeping Records

We maintain policies and procedures that help ensure the accuracy of our financial reporting and honor our commitment to stakeholders. Accurate and complete records are the foundation of the Unisys financial reporting and controls process.

Associates must:

- Ensure that Unisys payments and transactions are properly approved and recorded on Unisys books.
- Comply with applicable accounting requirements in each country where Unisys does business.
- Ensure that your time records are current, that they reflect the hours that you worked and that the time is charged to the correct code.
- Accurately and honestly charge costs, including in your expense statements.
- File accurate and timely financial disclosures and reports to the U.S. Securities and Exchange Commission and other national and international regulators.



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Information Security

As a company that provides security solutions to our clients, security is part of our DNA. Everyone has a responsibility to protect Unisys data and that of our clients. Remember that we are all responsible for cybersecurity, and we are all obligated to maintain information security by complying with the relevant laws and Unisys Information Security Policies.

Associates must:

- Protect and never share your password.
- Create and maintain complex passwords.
- Identify phishing and social engineering attempts, and immediately report suspicious activity to Information Security.
- Safeguard Unisys or client data and not store it on personal or removable devices.




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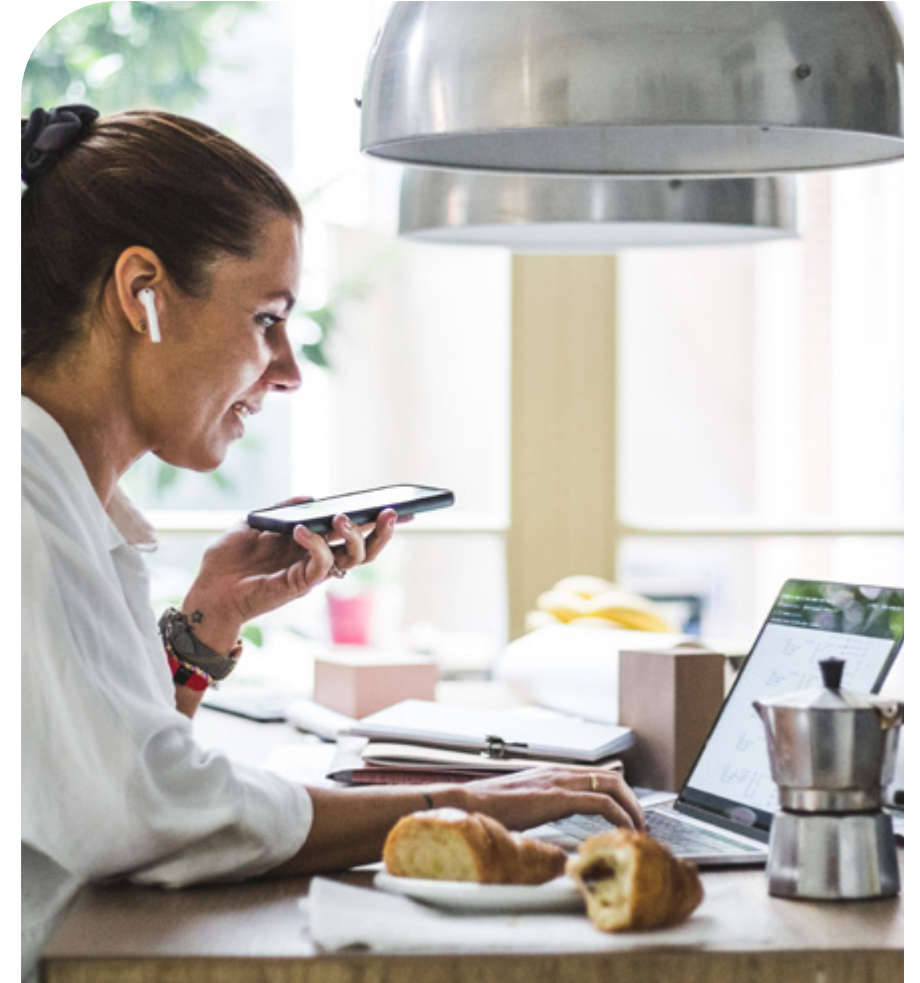

Responsible Use of Artificial Intelligence

Artificial intelligence (“AI”) has transformed how we work, how we serve our clients, and how we deliver value. At Unisys, we embrace AI as a powerful tool to push beyond the status quo and power progress, but only when used responsibly. Our commitment to integrity extends to every AI-enabled decision and action we take. Just as we hold ourselves to the highest ethical standards in all we do, we apply those same standards when working with AI.

These principles apply to every associate in every role. Using AI responsibly is an integrity obligation that belongs to all of us. We also expect our business partners and suppliers to apply the same standards when using AI on Unisys’ behalf.

Associates must:

- Use only AI tools that are approved by Unisys and authorized under Unisys’ AI Policy, AI Acceptable Use Guidelines and AI Governance Risk Evaluation and Escalation Standard.
- Ensure all AI use complies with contractual obligations and Unisys policies and standards, including those governing data privacy, information security, records management and confidential information.
- Never input non-Unisys copyrighted material into any AI tool.
- Verify AI-generated output before acting on it or sharing it.
- Clearly label AI-generated content in work products where disclosure of AI use is required by law or contractual obligation but not in routine business communications such as email.
- Never rely solely on AI output and remain personally accountable for the result.
- Report any AI tool, use case, or output that raises a concern, appears biased, or may violate our Code or Unisys policy to the AI Governance Office (AIGovernance@unisys.com) or through the Compliance Helpline.
- Submit new or proposed AI use cases through the Unisys AI Governance intake process (outlined in the AI Governance Risk Evaluation and Escalation Standard) before deployment.
- Read, understand, and certify compliance with Unisys’ AI Policy, AI Acceptable Use Guidelines, and the AI Risk Governance Risk Evaluation and Escalation Standard.



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Integrity With Society and Governments

We Conduct Our Business as
Responsible Citizens in Accordance
With the Laws and Regulations
Everywhere We Operate.



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Interactions with the Public Sector and Government Officials

We have special obligations to comply with laws and regulations when we are conducting our business with public sector clients and government officials. These obligations also apply to lobbyists, consultants and other third parties who represent Unisys in the public sector.

Associates must:

- Obtain approval from your Business unit head (for U.S.) and the Ethics & Compliance Office (outside of the U.S.) before hiring a lobbyist, consultant or other third party or joining a trade group that engages with the government.
- Consult with the Legal Department to understand any requirements associated with contracting with United States local, state or federal agencies or other government bodies globally.
- Ensure that any entertainment or business courtesies are in line with Unisys Antibribery and Gifts & Entertainment policies.
- Consult with Human Resources and the Ethics & Compliance Office before hiring a current or former government employee.
- Immediately contact the Ethics & Compliance Office if you receive a request for information from a government agency.
- Never engage in lobbying activity on behalf of Unisys. If a lobbying need arises, contact Public Sector Risk & Governance for guidance.



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Political Activities

Unisys encourages personal participation in the political process in accordance with local, state, federal and international law. Personal activities, including making contributions, should never be represented as coming from Unisys or as reflecting Unisys sponsorship and must be done using your personal time and resources. Unisys does not allow political campaign or partisan political activities at any Unisys workplace or facility or on Unisys media channels. Violations could lead to loss of business, financial penalties and prosecution by state or federal entities.

Associates must:

- Contact the Ethics & Compliance Office if you plan to run for office or actively assist a political campaign.
- Never use Unisys resources, including company computers, telephones or e-mail for political campaigning, fundraising or other political activities.



Leaders must also take care not to directly or indirectly pressure, or allow others to pressure, associates to support, contribute to or campaign for any candidate or party.


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External Communications and Social Media

Our public statements, marketing materials and communications must be honest, accurate and transparent. Only designated associates are authorized to speak on behalf of Unisys with external parties like the media or analysts; others are prohibited from doing so without permission from Corporate Communications.

There are many communication channels, and social media is a key part of our Unisys culture in the ways we connect, network, collaborate and exchange knowledge, expertise and information. It is critical that we exercise good judgment, common sense and courtesy when using all social media platforms. All use of social media by associates must abide by our principles even when posting on personal accounts.

What and how we communicate has an impact on our well-earned reputation.

Associates must:

- Never post items that might violate our Code and policies, including photos or information about our colleagues, posts that disclose confidential information, or messages that might be viewed as harassing or discriminatory.
- Never speak on the company's behalf on any topic unless you receive prior approval. Only authorized individuals can communicate the company's official position on certain topics such as financial performance, strategic business plans, legal matters and public policy issues.
- Remember that you represent Unisys, and consider how your communications support our business, our values and our brand.
- Make sure that any posts clearly indicate you are expressing your own views and not those of Unisys.
- Refrain from posting information about a prospective, current, or former client of Unisys.



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Charitable Contributions

While Unisys encourages us to support our communities, any charitable contributions made by the company must be consistent with company practices.

Associates must:

- Obtain necessary approval from the Ethics & Compliance Office before making any contributions.
- Seek opportunities to take tax deductions for any contributions.
- Take measures necessary to ensure that contributions of hardware comply with Information Security requirements, such as certifying that information has been deleted and that software transfers are in line with licenses.



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Insider Trading and Self-Dealing

In your role, you may become aware of material, nonpublic information about Unisys or our business partners.

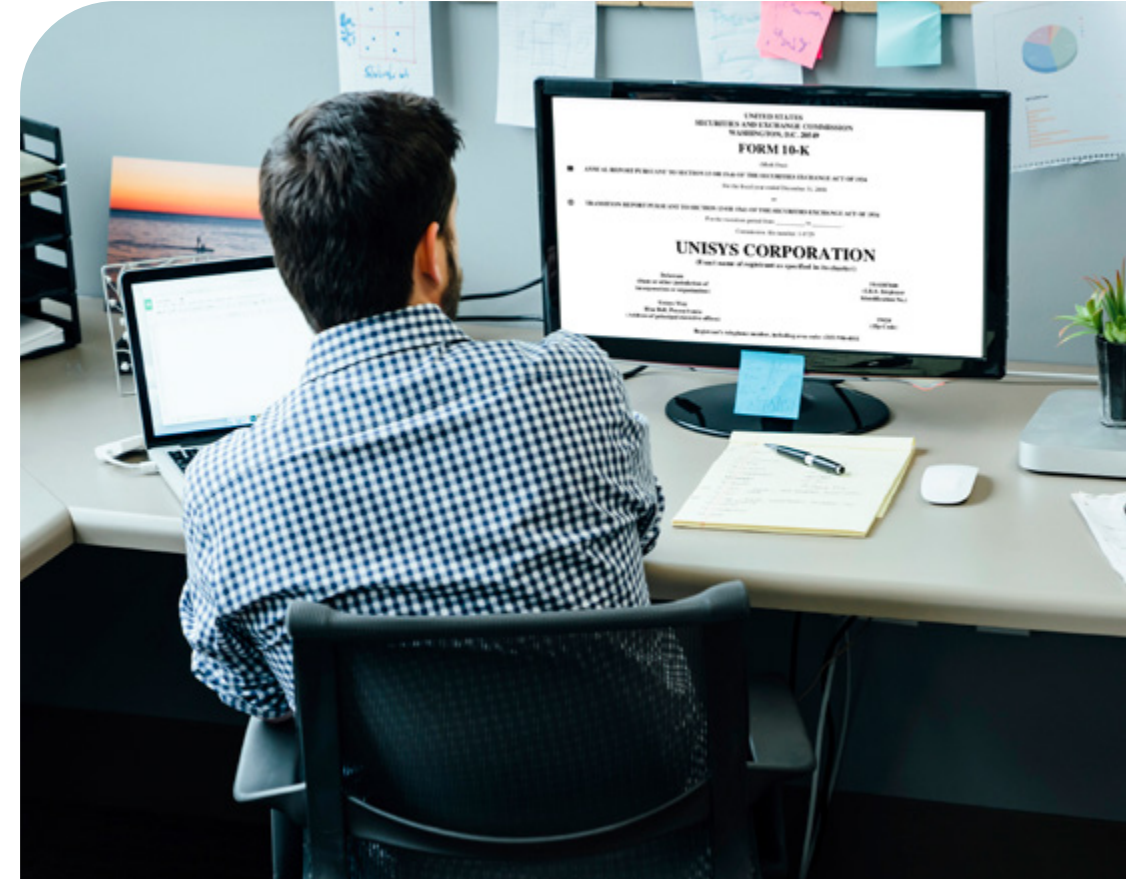
Information is material if a reasonable investor would consider it important in deciding whether to buy or sell a company's securities. Information is nonpublic if it has not been broadly communicated to the investing public.

It is illegal to trade in Unisys securities or the securities of another company based on material, nonpublic information.

You have a duty to Unisys to advance Unisys's legitimate interests should the opportunity arise. Self-dealing occurs when you use information gained as a result of your position at Unisys to take advantage of or influence a business decision, transaction, or opportunity in order to benefit yourself, a family member, or a business in which you or a related person have a personal financial or other significant interest.

Associates must:

- Never buy or sell any securities based on material, nonpublic information.
- Never give someone else (for example, a friend, spouse or broker) a "tip" regarding material, nonpublic information, or recommend or suggest that anyone trade in material, nonpublic information.
- Never use nonpublic information you learned through your work for Unisys to place bets on prediction markets.
- Never take personal advantage of opportunities or favors offered to you by virtue of your employment with Unisys.
- Never take for yourself or your family members any opportunities that Unisys could have an interest in that are discovered using your Unisys position, information or property.
- Be respectful of company property, information, and position, and make sure that neither you nor your family members use them for personal gain.



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Conflict Minerals and Human Rights

Unisys respects fundamental human rights. All forms of slavery, human trafficking, forced labor and child labor are prohibited within Unisys operations, and we make every effort to make certain they are not present in our supply chain.

We are committed to obtaining parts and supplies from businesses that share our values regarding human rights and ethical practices. We adhere to regulations regarding the use of conflict minerals and require the same from our suppliers.

Associates must:

- Understand the human rights issues that might apply to your activities at Unisys.
- Expect our suppliers to be socially responsible and to comply with laws, regulations and standards related to employment, human trafficking, slavery and the use of conflict minerals.



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Export Controls and Trade Sanctions

We comply with all laws that govern how our technology may be distributed and used internationally. Global trade controls, boycotts, embargoes and other sanctions limit or prohibit us from doing business with restricted entities, such as certain countries, governments and individuals. These rules dictate how we import or export goods, services, software and technologies. As a technology company, we must be particularly responsible with our products and services.

Associates must:

- Know about the various restrictions on exporting our technology and services to direct customers and end users.
- Collaborate with the Trade Compliance group to obtain any required authorization or license.



Leaders must also conduct appropriate due diligence on business partners and understand the full structure of any deals involving exported technology.



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Anti-money

Laundrying

Unisys complies with anti-money laundering laws to prevent third parties from attempting to conceal the source of illicit funds. We have procedures and conduct due diligence to avoid receiving funds which may be the proceeds of criminal activity.

Associates must:

- Follow onboarding procedures when working with a new business partner.
- Alert the Finance Department to any suspicious transactions or unusual requests from third parties regarding payment structures.





Environment

We incorporate environmental sustainability into what we do, which strengthens our ability to better serve our clients, our associates, our surrounding communities and the environment. We strive to operate our business in a manner that mitigates the potential for adverse environmental impact, promotes the conservation of energy and resources, reduces waste and meets or exceeds governmental environmental requirements.

Associates must:

- Work with our operations group to meet or exceed governmental environmental requirements.
- Utilize our recycling program to recycle office waste and ensure safe disposal of electronics.
- Seek opportunities to conserve energy and resources and engage in actions that promote sustainability.



Compliance with Our Code

Our company
Culture depends on
following Our Code,
asking questions and
raising concerns.



Conducting our Business with **Honesty and Integrity**

Our Code does not contain everything you will need to know about conducting our business with honesty, integrity, and a clear commitment to complying with our policies and the law. You must exercise good judgment, seek further guidance from our available resources, ask questions and, where something does not look or feel right, raise concerns.

You are expected to be honest and always act in accordance with our Code, and failure to do so could result in discipline, including termination of employment.





Speaking Up

We all have a responsibility to speak up if we have an ethics concern or suspect that someone we work with, work for or contract with is violating our policies, behaving inappropriately, illegally or acting unethically. We should speak up even if we believe that the issue has been resolved. If you are in doubt, ask for guidance.

No Retaliation

Unisys does not tolerate retaliation. It can be uncomfortable to act with integrity, and speaking up can take courage. That is why we do not tolerate retaliation for reports made in good faith. Anyone who retaliates against an associate for reporting concerns or participating in an investigation will be subject to disciplinary action, up to and including termination.

If you experience retaliation, or you know of someone else being subject to retaliation, you should speak up and report your good faith concerns immediately.




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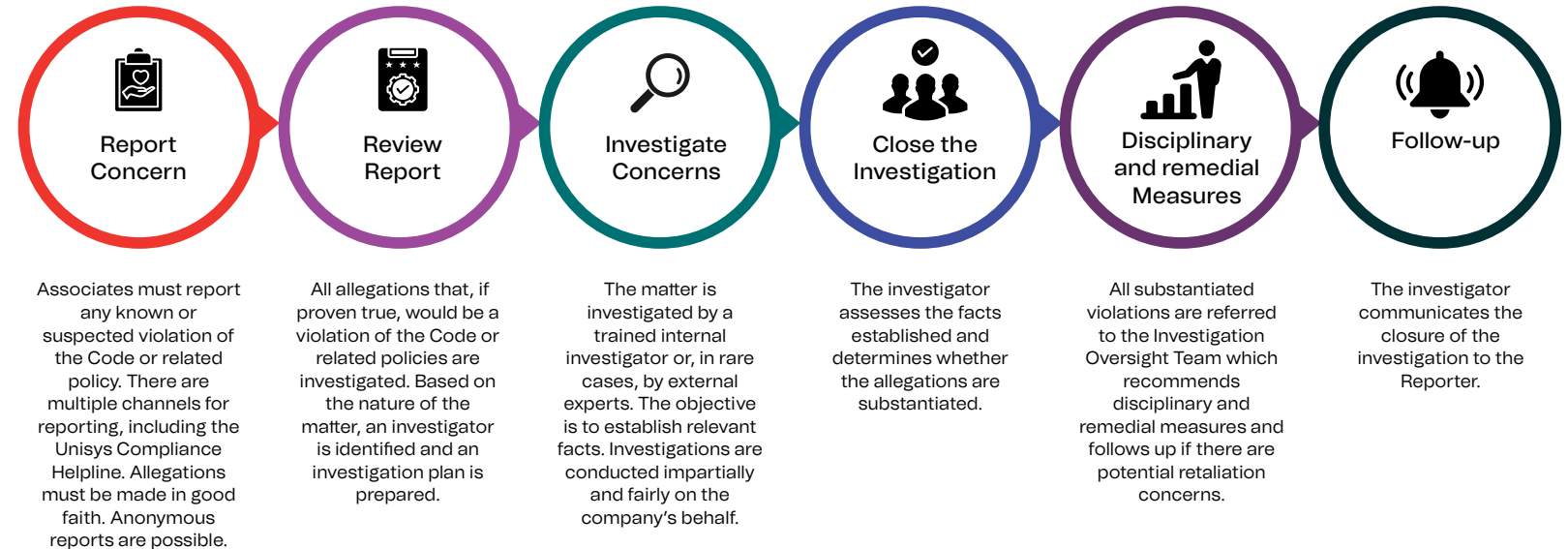

Investigations

We take all reports made in good faith seriously and investigate them promptly, fairly, and confidentially when possible. Associates should cooperate with any Unisys investigation conducted by the Ethics & Compliance Office, Associate Relations, Human Resources or the Legal Department. In addition, Government agencies and other third parties may also request information from or about Unisys. If an outside party contacts you in an investigation, be courteous and respectful, but forward any requests immediately to the Ethics & Compliance Office or the Legal Department.

Associates must:

- Cooperate in any investigation: answer questions truthfully, and promptly provide all information requested.
- Never investigate matters yourself.
- Examine your actions to ensure you do not intentionally or unintentionally retaliate against anyone involved an investigation.

The Investigations Process





Oversight

The Unisys Leadership Team and the Board of Directors are responsible for overseeing the Ethics and Compliance Program and compliance with our Code.

Enforcement and Waivers

Violation of our Code may result in disciplinary action, up to and including termination of employment. Waivers to provisions of our Code must be requested in writing sent to the Unisys Chief Compliance Officer and are not valid until approved by the Chief Compliance Officer and the General Counsel. Only the Board of Directors may waive a provision of our Code for a member of the Leadership Team or an officer of the company. Any waiver that is granted to an officer or a leader will be publicly disclosed as required by NYSE listing requirements and applicable laws, rules and regulations.





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How to Speak Up

There are several ways to report a concern or ask a question. Where permitted by law in your country, your report may be made anonymously through the Unisys Compliance Helpline, or you can ask that your identity be kept confidential.

Choose the reporting option you are most comfortable using, and trust that whichever option you choose, your confidentiality will be protected.

How to Report a Concern Internally

All associates are expected to identify and speak up about behavior they believe could violate our Code or related policies through one of several reporting channels. The channel you select to report a concern may depend on the circumstances, the involved parties, and your comfort level.



Immediate or senior level Leaders, Human Resources, Associate Relations, the Ethics & Compliance Office, or the Legal Department



The Unisys Compliance Helpline
(www.Unisyscompliance.com)



Call Center (U.S. toll-free 800-376-7504 / Visit www.UnisysCompliance.com for local numbers outside the U.S.)



~ComplianceEthicsOffice@unisys.com
~AssociateRelations@unisys.com



Ethics & Compliance Office, Unisys Corporation, 801 Lakeview Drive, Blue Bell, PA 19422 USA



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Integrity

is in our code.



Have a question or concern? The Compliance helpline is a global, multilanguage website for reporting potential wrongdoing that also includes international toll-free phone numbers. Use it to ask a question or let us know about a potential violation of a policy or our Code of Ethics and Business Conduct. No adverse action or retribution will be taken against you for reporting a potential problem in good faith.

www.UnisysCompliance.com

This document constitutes Ethics Policy 1.0, effective 7/31/2026 and supersedes any prior versions. Printed versions of this document may not be current; verify the current version on the Unisys Policies & Procedures [website](#) before taking action. The English version is the prevailing version of this document. However, it is specified that in the circumstances where there would be discrepancies between this code and mandatory local laws, local laws will apply.



[unisys.com](#)

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