



# Our Code of Conduct

October 2020

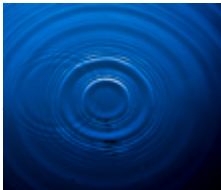
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# Our Values

# Our Values



Results



Relentless



Teamwork



Empathy



# A Message Regarding Our Code

# A Message from Duncan Angove

## Chief Executive Officer

We always strive to do the right thing at Blue Yonder, where we are known for our strong customer service and for delivering on our promises. Together we work relentlessly to seek results for our customers, but that does not mean we ever compromise our values or fail to follow the rules.

Our Code of Conduct (our “Code”) is an important tool for us to use in completing our mission ethically and in compliance with our policies and the law. Our Code applies to us all, therefore we all must take the time to review the important information that is contained here. It will help us identify issues, take proper courses of action, and provide guidance and resources on many dilemmas we may face.

Not every situation you come across is covered in our Code, and not every risk discussed here will apply to you in your role. But all of us, regardless of our roles, must be vigilant regarding the compliance risks we face and be prepared to speak up, ask questions, and report any concerns we may have. If you are unsure or have questions about a situation, do not wait—seek help using the [resources](#) discussed here in our Code.

As we move into the future guided by our core values, let us not lose sight of who we are: we are an ethical organization and we will never compromise that.



**“ We always strive to do the right thing at Blue Yonder. ”**



**Empathy**



**Results**



**Relentless**



**Teamwork**

# A Message from Rebecca Collins

EVP, General Counsel

We are pleased to share Our Code of Conduct with you. At Blue Yonder we are at the forefront of the industry and we are constantly challenging ourselves to provide better results for our customers. Those results can never be at the cost of our ethics or secured through misconduct. This applies to each of us; we all have a role in ethics and compliance at Blue Yonder.

Our Code is an important resource, but it is only valuable when we follow it. We all must be on the lookout for compliance risks and make sure that we fully understand our responsibilities and the rules that apply to our role at Blue Yonder.

Our Code cannot cover every potential question we might have – that is why we have many resources you can use if you have a question or need to report a concern. You can seek guidance from your manager, Human Resources, called Associate Success at Blue Yonder, or the Legal and Compliance department, or you can call the Blue Yonder EthicsLine.

We do not tolerate retaliation against those who bring up valid concerns and those who engage in retaliation will face discipline. So please, speak up when you have a question or concern.



**“ We all have a role in ethics and compliance at Blue Yonder. ”**



Empathy



Results



Relentless



Teamwork



# Our Commitment to Integrity



# Our Commitment to Integrity

## We Understand Our Code's Purpose

Our Code is here to help us. It can help us navigate our daily work challenges and many potential issues we might face with each other, our customers, our partners, or anyone else. While our Code cannot cover every issue we might face in our role at Blue Yonder, we rely on our shared values, teamwork, and our commitment to do the right thing in all circumstances.

Just as we relentlessly seek results in our work for our customers, we also seek to overcome any compliance challenges we face.

Our Code discusses several compliance risks we might face, how we might navigate those risks, and, more importantly, how to seek answers and get help when we need it.

Our Code applies to everyone at Blue Yonder. We all must follow our Code and know the valuable information it contains.

## We Understand Our Role

We follow our Code, Blue Yonder Corporate Policies (“our policies”), and the law, and we will all face the same consequences for not doing so. In the event that our Code or

policies differ from local law, we will always comply with the law. In some cases, it might be difficult to determine what law applies or how we should proceed. If you ever have any questions about the law, our Code or our policies, or what you should do, please contact the Legal and Compliance department for guidance.

We all have a role in compliance at Blue Yonder. As a team, we all have a duty to make sound decisions based on our shared values, and we all must speak up and be ready to ask questions when we suspect or know of potential misconduct.

We do not try to investigate or resolve issues on our own.

**“ We all must be vigilant of the compliance risks we face and be prepared to speak up. ”**



## We Speak Up and Ask Questions

We have a duty to speak up when we have questions or concerns. If you have observed misconduct that potentially violates our Code, our policies, or the law, please contact your manager or one of the other resources listed on this page. Any concerns you have about financial, accounting, internal controls, or auditing matters must be reported to your manager or to the Blue Yonder [EthicsLine](#) and may be shared with the Audit Committee of the Board of Directors.

If you are not comfortable reporting an issue to your manager or the other resources listed here, you can make an anonymous report (if allowed by local law) on our Blue Yonder [EthicsLine](#).

**Remember:** we can only fix problems when we know about them – and you cannot assume others will speak up if you do not.



## CODE NOTES

### Speaking up

- It's our duty to speak up when we have concerns
- Retaliation is not tolerated
- We have many options when it comes to asking questions and reporting concerns



You have many different resources you can use:

- Your manager
- Associate Success
- The Legal and Compliance department
- The Blue Yonder EthicsLine (see [ethicsline.blueyonder.com/](https://ethicsline.blueyonder.com/) to report online or review a list of toll free numbers)

## We Do Not Tolerate Retaliation

Asking questions and reporting concerns free from the fear of retaliation is what we all expect. Blue Yonder prohibits any retaliation against anyone for asking questions or reporting issues in good faith.

We all should feel free to ask a question, make a report, or participate in any investigation without any fear. If you feel you, or someone else, has been retaliated against, you should immediately contact one of the resources listed in our Code.

Anyone who retaliates in any way against those who speak up in good faith will be disciplined, up to and including termination.



“Good faith” reporting means providing all the information you have that you believe to be true and accurate.

## We Have a Clear Investigation Process

Blue Yonder will take prompt action when a report is made.

What happens when a report is made?

- Blue Yonder will open a case and investigate all reported concerns
- We will not allow retaliation for making good faith reports
- We will make every effort to protect the reporter’s identity, consistent with local law

- Those who report may be asked to participate in the further investigation, including interviews
- Investigation findings are completed
- Investigation details may be provided to those reporting when consistent with privacy considerations
- If discipline is called for, it will be applied fairly and consistently



## We Expect Our Managers to Be Role Models

Managers have a special role when it comes to compliance at Blue Yonder. Managers are on the front line and they are the ones we all look to for support and leadership.

Managers must:

- Know our compliance resources, our Code, our policies, and any law that applies to our operations
- Have an open-door approach and be willing to answer questions and escalate reports of misconduct to the appropriate resource, including executive management, Associate Success, Internal Assurance, or the Legal and Compliance department
- Exhibit, discuss, and promote our shared values and ethical decision-making
- Proactively discuss compliance risks and ethical dilemmas
- Never discourage reporting nor engage in retaliation



**Q:** Omar has login credentials for a customer's system to do his work on a new project. Omar's co-worker Dianne asks him for his login credentials because hers are not working. Our agreement with the customer clearly states we cannot share login credentials. He doesn't want to get Dianne in trouble if she didn't mean to do anything wrong. What should he do?

**A:** Omar should tell Dianne that this is not allowed and refuse her request. If she insists that it is okay, he must report his concern to his manager or other appropriate resources listed in our Code. If you think you know of a potential problem, such as a security risk, speak up. You will never experience retaliation for making an honest report.

# Our Commitment to Our Team and Customers

# Our Commitment to Our Team and Customers

## We Value a Respectful Workplace

We work together as a team and believe in respect and inclusion. We do all we can to create a workplace free of harassment of any kind, a workplace where unwelcome or inappropriate conduct is not tolerated. Discrimination, harassment, and bullying in any form—whether verbal, physical, or visual—is prohibited.



### CODE NOTES

#### We value a respectful workplace

- We work together as an inclusive team
- We do not discriminate, harass, or bully
- We speak up if we are harassed or know of harassing conduct

If you are subject to harassing conduct or believe someone else is the subject of harassing conduct, you should immediately report the issue to your manager or one of the resources listed in our Code.

We also know that we are stronger when we provide an inclusive environment of varied viewpoints and talents where our employees are respected and where all decisions about employment are made on the basis of merit and qualifications. We are committed to equal employment opportunity and do not make employment decisions based on:

- Race
- Color
- National origin
- Citizenship status
- Gender
- Age
- Past or present military service
- Disability



**Q:** Natasha’s manager regularly makes comments about her appearance. His comments are complimentary, but they still make Natasha uncomfortable. Natasha has not said anything to her manager about the comments. What should she do?

**A:** Natasha should inform her manager that his comments make her uncomfortable if she feels comfortable saying so. In the event she is not comfortable confronting her manager directly, she should report the issue to Associate Success or one of the other reporting resources in our Code. Even if the comments are not meant to offend, they still can constitute harassment or the creation of a hostile work environment.

## We Work Safely

While we are relentless in pursuing our goals, the safety and well-being of everyone who works with us and shares our community is our priority. We keep a safe workplace and follow all safety rules.

We do not tolerate any violence or any threat of violence in our workplace.

If you have a question or concern about health or safety, please contact your supervisor or one of our other reporting resources.

We must also maintain a drug-free and alcohol-free workplace where the use, sale, or possession of illegal drugs, and the misuse of prescription drugs, along with the abuse of alcohol, is strictly forbidden.



**“ We all must fully understand our responsibilities and the rules that apply to our role at Blue Yonder. ”**





## We Protect Privacy

We keep the personal data of our fellow associates, contractors, customers, partners, and any third parties private and secure. When legitimate purpose requires that we collect, use, process, and store personal data, we make sure to follow all company policies and applicable laws. We provide limited access to only those who have a specified purpose for accessing and using such personal data and who have been provided authorization to access it. For additional information, please visit our website and review our [Privacy Commitment](#).

If you have any questions about how to handle such information or know of a potential breach of such information, contact your manager or our [EthicsLine](#).



## CODE NOTES

### Protecting privacy

- We maintain the privacy of others' personal data
- We follow privacy laws and our policies and procedures
- We report potential breaches



**Q:** James found a list of associate names, addresses, and salary information sitting on the copy machine in the copy room. He did not look at the information. Is it okay if he just puts the list in the trash can?

**A:** No. While it is appropriate that James did not review the information, he cannot simply throw it in the trash. He should contact our [EthicsLine](#) to find out how to handle the issue.





# Our Commitment to Blue Yonder

# Our Commitment to Blue Yonder

## We Avoid Conflicts of Interest

We are loyal to each other and to Blue Yonder, and we avoid conflicts of interest or even the appearance of a conflict. Conflicts can make it difficult for us to perform our work objectively and can cause others to question our loyalty or objectivity.

We do not enter into any agreement or business to compete directly or indirectly with Blue Yonder. We do not use our position to acquire improper benefits or opportunities including gifts, loans, investment opportunities, outside employment, contracting opportunities, or professional opportunities such as a position on another organization's board of directors.

We may not directly or indirectly supervise any member of our own family or someone with whom we have a personal relationship. Additionally, when a personal or family relationship may impact our decision-making or hiring, or might lead to the appearance of a conflict of interest, we must come forward promptly to disclose the potential issue to a manager or to one of the reporting resources in our Code.

When we've identified a potential conflict of interest, we must tell our manager or the Legal and Compliance department so that the potential conflict can be evaluated.

**“ We have many resources you can use if you have a question or need to report a concern. ”**



A conflict of interest occurs when our individual interests interfere or compete in any way with Blue Yonder's interests. Conflicts can arise when we use our position with the company, or information we have access to due to our role, to pursue opportunities or other benefits for ourselves, family members, or friends.



Circumstances where conflicts can arise include:

- Developing products or providing services that could compete with Blue Yonder, even if you do not use Blue Yonder resources or complete the projects while working for Blue Yonder
- Having a family member or friend who works for a Blue Yonder customer, competitor, or partner
- Possessing or pursuing investments in or opportunities with a customer, competitor, or partner other than an incidental investment that you do not direct (such as in a mutual fund)



**Q:** A customer that Hanna has been working with has some additional work in line with Hanna's skill set. The customer suggests that she do the work herself rather than through Blue Yonder. The project is not that large, it is not clear Blue Yonder would be interested, and Hanna is sure she can complete it on her own time on weekends. Is this okay?

**A:** No. Even if the second job would not interfere with Hanna's duties at Blue Yonder, she is potentially taking an opportunity that belongs to Blue Yonder. There is also a likelihood of confusion about who may be responsible for the work. Before you take on any additional outside work, including acting as a member of a board or other outside organization, you must first contact your manager or another reporting resource in our Code.



## We Keep Accurate Records

Our records must be a fair and honest reflection of our business. All of us who have responsibilities for financial records or any other Blue Yonder records or reporting must make sure that these records accurately reflect our business activities, are supported by evidence, and are complete, precise, and timely.

We do not:

- Make false or misleading statements or create false records or reports
- Mislead or manipulate others, including independent auditors, investors, or other stakeholders
- Falsely report financial accounting nor misstate or evade tax liabilities

We follow generally accepted accounting principles as well as all applicable accounting and record-keeping policies and procedures for preparing all records. Records can be on paper, or they can be digital or electronic. Blue Yonder has clear records management policies, and we must be familiar with the record retention policies or procedures that apply to our role. We comply with all legal holds (directives from the Legal and Compliance department to save certain records) and all tax holds (directives from the Finance or Tax departments to save certain records).

If you know of any inaccurate or incomplete records or have questions about any record or our record-keeping procedures, you should contact the Legal and Compliance department immediately.



**Q:** Henry supervises Carrie, who is responsible for entering project time for invoicing purposes. Carrie does not enter her time consistently, accurately, or as instructed. Henry adjusts the recorded time to reflect an estimated number of hours he believes she has worked. Is Henry doing the correct thing since he's trying to honestly estimate the time?

**A:** No. By keeping false or inaccurate records Henry undermines our commitment to transparency and accuracy. Henry should talk to Carrie and let her know that she must accurately follow our process and record-keeping rules every time.

## We Protect Confidential Information

Protecting confidential and proprietary information is vital to our success. Confidential information can belong to Blue Yonder, our customers, or other partners, and it can take many forms, including any non-public information that could be useful to competitors or could bring harm to Blue Yonder, our customers, or other partners if disclosed.



Types of confidential information include:

- Trade secrets
- Business trends and projections
- Blue Yonder associate, customer, contractor, or supplier data
- Research and development data
- Information about existing or potential contracts, orders, suppliers, or customers
- Information on potential mergers, acquisitions, divestitures, or investments
- Financial performance data
- New product or marketing plans

We must take reasonable steps to protect confidential information, including labeling, securing, and disposing of it safely and in accordance with our procedures. We do not share confidential information with anyone who has no valid business reason to use it. If we share confidential information outside of Blue Yonder, it must be done under the terms of a non-disclosure agreement.

Our duty to keep confidential information secure continues even after we leave Blue Yonder.



### CODE NOTES

#### Protect confidential information

- We properly handle, label, secure and dispose of confidential information
- We do not share confidential information unless there is a business reason or a non-disclosure agreement in place
- We keep Blue Yonder's confidential information secure even if we leave Blue Yonder



**Q:** Shilpa travels on Blue Yonder business and has to stay connected while on the road. Recently, when the battery in her company-issued laptop died, she used a public computer at her hotel to send and receive emails about confidential Blue Yonder business. It is okay for Shilpa to do this?

**A:** No. Shilpa should only use approved, secure means to communicate, particularly when she is conducting business with confidential information. We must be careful working with confidential information while we are in public places or using facilities that provide resources, such as shared computers, to the general public.

## We Protect Our Assets

We never use Blue Yonder assets for our own benefit, and we take care to ensure that Blue Yonder assets are not stolen, damaged, or misused by others. We need our assets and resources to complete our mission, so we have to make sure to use them properly and protect them. While we may use company resources in a limited personal manner, we understand that Blue Yonder has access to all the information stored on Blue Yonder assets as permitted by law, and we expect no right to privacy when using Blue Yonder assets and systems.



Blue Yonder assets include our intellectual property (IP), such as:

- Trade secrets, patents, trademarks, and copyrights
- Business, marketing, and service plans
- Engineering and manufacturing ideas
- Salary and other associate information
- Financial data
- Designs
- Customer data

Company assets include both physical equipment such as computers, telephones, smart phones, tablets, printers, and copiers, as well as digital assets such as email, voicemail, internet access, and computer software and applications.

If you have any questions about the proper use of any Blue Yonder property or assets, please consult your manager, or any of the resources mentioned here in our Code.



## CODE NOTES

### We protect our Company's assets and information

- We do not use Blue Yonder assets for our own benefit
- We protect Blue Yonder assets from misuse and damage
- We protect Blue Yonder's intangible assets such as intellectual property (IP)



**Q:** Zane used to be a graphic designer before he started in a sales position at Blue Yonder. A former customer contacts him for help designing a new marketing campaign for products that do not compete with Blue Yonder. Zane agrees to the job and only plans to work on the project after hours. Sometimes he uses his Blue Yonder-assigned work computer because it is faster and also allows him to work on

Blue Yonder projects when he needs to catch up. Is this okay?

**A:** No. We all are responsible for using Blue Yonder computer systems ethically and legally. While occasional personal use of our systems can be permitted, our computing systems are primarily intended for Blue Yonder business use and not outside business use.

## We Communicate Responsibly

We are relentless about our mission, and we rightly want to share our passion for Blue Yonder—but we must temper that passion with responsible communication to the public. Only a few of us who have been explicitly authorized to do so may speak publicly on behalf of Blue Yonder.

All of us must take care when we are using social media or otherwise making public statements and realize:

- What we say or write will be public
- We must be clear we are speaking for ourselves and not Blue Yonder
- We cannot violate our Code, our policies, or the law online



We should refer requests for information to the correct resource:

- Financial or investor questions  
➔ Finance department
- Media requests  
➔ Marketing department
- Government or regulator requests  
➔ Legal and Compliance department



**Q:** Kyoko noticed a post on a social media site incorrectly stating that Blue Yonder was involved in an illegal transaction. She's really upset because she knows it is not true, and she feels she can prove it. Can she post in response?

**A:** She should not. Blue Yonder has designated specific personnel to speak on behalf of the company, and unless you are so designated, you should withhold any comment that might be interpreted to be on behalf of Blue Yonder, even if you do not mean it to be. Please see our Social Media Policy.

# Our Commitment to Customers and Communities



# Our Commitment to Customers and Communities

## We Do Not Bribe or Accept Bribes

Our business is about seeking results, but not at the expense of our integrity or through corruption. Just as we strive relentlessly to succeed and innovate, we should work equally hard to avoid bribery, to be careful when we give gifts or entertainment, to keep track of our business expenses, and to make sure those who represent us also do not engage in corruption.

We never provide anything of value to our commercial partners or any foreign government officials to either secure an advantage or influence any of their decisions. We win through customer value, not by paying bribes to secure or retain work or other opportunities. When dealing with our partners and other third parties, we never accept or demand anything of value on Blue Yonder's behalf to influence our decision-making.



### CODE NOTES

#### We don't bribe

- We do not provide or accept any bribes
- We are careful when providing gifts and entertainment and follow our policies
- We keep accurate and complete records



A “foreign government official” can be someone employed by a government or an employee of a business that is owned or controlled by a government. It can include politicians and those who work for international bodies like the World Bank.



When we are providing business courtesies, gifts, or entertainment, we must carefully follow the rules described in our [Travel and Entertainment policies](#) and make certain that any gifts we give or entertainment we provide cannot be confused for a bribe. Be aware that many government officials are not allowed to accept any gifts. This topic can be deceptively complex, so please contact the Legal and Compliance department if you have any questions or concerns.

Keeping [accurate records](#) of our expenses and related activities is also an important aspect of our anti-corruption program. Never misallocate funds or provide false information in Blue Yonder's records.

We also never retain a third party to engage in such misconduct for us. No one can bribe on our behalf. We make sure to work with reputable third parties on whom we've conducted due diligence and who we have educated about our anti-corruption policy.



**“ We are an ethical organization and we will never compromise that. ”**

Anti-corruption and anti-bribery laws can be complex, and the penalties for violating them are severe. Associates engaging in corrupt activity or bribery may also face discipline, including termination. Please seek more information and guidance if you have questions, and remember, if you contact our Legal and Compliance department or our Blue Yonder [EthicsLine](#), they can help.



“Anything of value” can be almost anything, including cash, cash equivalents (gift cards), gifts, favors, food, entertainment, and opportunities.



**Q:** Sidney is trying to secure a new project with a state-owned power company and has been told that working with a certain distributor will be helpful. The distributor tells Sidney that if Blue Yonder works with them, they will “get things done.” When Sidney explains that we have a due diligence process for third parties, the distributor states, “I’ve heard about this before. Those investigations take too long, and we are not interested. You can engage us or not, but we’re not participating in your investigation.” This new business will be important. What should Sidney do?

**A:** Sidney should recognize several red flags in this situation and should not continue discussions with the distributor unless the company is willing to engage in our due diligence process. We cannot work with partners that we are unsure of or who might violate the law.

## We Compete Fairly

We are successful because of our relentless pursuit of results, our superior products and services, our focus on our customers, and our strict adherence to our values. We do not cheat to win at business, and we engage in fair and open competition. We comply with all competition and antitrust laws, and we do not engage in any activities, nor make any verbal or written agreements, with our competitors or potential competitors relating to any of the following:

- Prices
- Discounts
- Bids (or the intent to bid)
- Costs
- Profits
- Margins
- Products

- Services
- Terms and conditions
- Market share or division of customers
- Customer or supplier lists
- Salaries
- Boycotting customers or suppliers
- Selection or retention of suppliers or customers
- Sales or marketing plans
- Limiting production or sale
- Associate hiring



## CODE NOTES

### We compete fairly

- We do not cheat to win—we engage in fair and open competition
- We do not make agreements with competitors to unfairly compete
- We do not make false or misleading claims about our competitors

## We Compete Fairly

If you know of agreements or discussions regarding any of these topics, you should immediately contact the Legal and Compliance department.

We also must not make false or misleading claims about our products or services or a competitor's products and services. We should never do anything that might confuse or mislead our customers about our products or a competitor's products. We compete on our merits, not on false statements. We also do not misuse or seek to misuse any intellectual property rights in any effort to unfairly limit competition. We must demonstrate our commitment to fair competition, so please contact the Legal and Compliance department or [EthicsLine](#) if you have questions about how antitrust or competition law applies to you.



**Q:** Lane is at an industry trade show and is eating lunch at a table with people she does not know. It turns out that two men sitting next to her work for a competitor, and they are talking about a new product and product strategy. Should Lane listen closely and report back to her team about this?

**A:** No. We compete fairly and honestly and do not seek an advantage against our competitors that's based on overheard gossip or intelligence. Lane should leave the table, contact the Legal and Compliance department and report the conversation.



## We Follow Trade Laws

Blue Yonder is a global company, and we must be aware of all trade restrictions or sanctions that might apply to the work we do. Trade and sanction laws and regulations can be complex and can change often. If your job responsibilities involve the import, export, or transfer of hardware, technology,

software, or information, you must be aware of the regulations that apply to that activity as well as our internal policies and procedures that cover it. Even if you do not physically transfer technology or technical data out of the country (particularly in the case of the United States), transfer to a foreign person can be considered an export.

If you have any questions about this process, you should contact the Legal and Compliance department.



**Q:** Ghingi is working with a new partner based in the United Kingdom. The partner will not tell her who the product end user is despite Ghingi asking multiple times. Can Ghingi move ahead with the transaction?

**A:** No, Ghingi should not move ahead. We must know who the end

user is. While the partner is based in the U.K., the end user might be in a country where we have strict sanctions prohibiting export, or the end user may otherwise be forbidden to receive the technology. Ghingi should talk to her manager; together, they should decide whether to involve the Legal and Compliance department.

## We Respect Others' Assets

We carefully maintain any customer resources or data over which we have care, custody, or control. This includes third-party property such as licensed software. In handling others' assets and data, we follow

the same standards and procedures we use regarding Blue Yonder's assets and data.

We never intentionally violate the confidentiality, privacy, or intellectual property (IP) rights of others. Even if information is freely revealed by a third

party, if we know that the information is confidential or that such information must not be used nor disclosed, then we must report the disclosure to our manager or another resource listed in our Code.



**Q:** Samuel needs some software that other associates in his group already have so that he can be more efficient at his work, but he has been told it will take several weeks to get it approved. Can he copy the program from one of his colleagues so he can load it on his Blue Yonder work computer if he knows he will eventually get the software through the proper channels?

**A:** Samuel should check with the Information Technology Group to see what our contract with the software manufacturer allows. Sometimes our license is for everyone at the company, but sometimes there are limits on the number of people who are allowed to use the software. We want to be sure we don't violate our agreement.



## We Prevent Money Laundering

We must be aware of the signs of money laundering and make sure we do not facilitate or support the process of covering up the source of illicit funds of terrorist or criminal activities through our legitimate business.

We must know our customers and partners. If you have any concerns about payments or transactions or conducting business with a party that refuses to provide information about its identity or transaction details, or otherwise suspect any involvement in money laundering activity, you should immediately report such concerns to the Legal and Compliance department.

Money laundering red flags:

- Request to bypass normal processes or normal record-keeping
- Request to or from countries with no relation to the relevant agreement or invoices
- Request to pay in cash
- Request that involves undue complexity or uses third parties or intermediaries with no clear role in the transaction



**Q:** Willa is working with a new customer who wants to pay for services using wires that do not appear to be coming from the company they represent or even from the same country of origin. What should she do?

**A:** Willa should talk to her manager and the Legal and Compliance department because these could be red flags that indicate money laundering activity.



Money laundering is the process of concealing the true origin of illicit or illegal funds through transactions that appear to be legitimate. It can include funds from criminal activities such as terrorism, drug trafficking, fraud, bribery, smuggling, and robbery.



## We Give Our Time and Money Responsibly

Our team cares about the communities where we work and live. Many of us want to serve those communities in charitable roles, through volunteering, engaging in the political process, or providing donations.

While Blue Yonder encourages an engaged team, there are some things to keep in mind.

Blue Yonder employees may not:

- Lobby on behalf of Blue Yonder without written permission from the CEO and the Legal and Compliance department
- Provide or use any Blue Yonder funds or assets for political or charitable campaigns
- Provide any funds, or anything else, on behalf of Blue Yonder to any political or charitable campaigns
- Suggest Blue Yonder's support for any cause, charity, or political issue



**Q:** Dante supports a local charity and sees that it needs some computers. He knows that Blue Yonder is getting ready to update to newer laptops at his office, so would it be okay for him to provide some of the older laptops to the charity once all the Blue Yonder data is removed?

**A:** No. Dante is encouraged to devote his free time and his own funds to his favorite charities; he cannot commit Blue Yonder assets and resources to any outside group.





## Waiver

Any waiver of this Code for officers or directors of Blue Yonder must be made by the Board of Directors and will be promptly disclosed. Any waiver of this Code with respect to all other associates must be approved by the CEO and will be reported to the Board of Directors.

## We Speak Up and Ask Questions

If you are not comfortable reporting an issue to your manager or the other resources listed here, you can make an anonymous report (if allowed by local law) on our Blue Yonder [EthicsLine](#).

**Remember:** we can only fix problems when we know about them - and you cannot assume others will speak up if you do not.

Doing the right thing is not always easy, so if you are not sure what to do, speak up and ask your manager or the Legal and Compliance department.



You have many different resources you can use:

- Your manager
- Associate Success
- Legal and Compliance department
- The Blue Yonder EthicsLine (see [ethicsline.blueyonder.com](https://ethicsline.blueyonder.com) to report online or review a list of toll free numbers)





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Blue Yonder Experience Center