

Partner Code of Conduct

Updated November 2023

Introduction

Leapwork ApS and its subsidiaries (“Leapwork” or “we”) is determined to conduct its business in an ethical and responsible manner, and we expect the very same of our partners and resellers (“Partners”). This Partner Code of Conduct (“CoC”) describes the expected behavior required from our Partners who are engaged in the Partner Program.

Leapwork requires all Partners to comply with applicable and controlling laws, rules, and regulations (collectively herein referenced as “applicable laws”) and at a minimum, with standards of business conduct consistent with those set forth in this Partner Code of Conduct, as updated from time to time.

You should read the Code carefully in its entirety, and you should reference it frequently as a guide to making the right decisions as a Leapwork Partner.

Scope

This CoC covers our Partners engaged in the Partner Program. It applies globally to any Partner and is to be read and understood in addition to the applicable Partner Agreement, as entered into between Leapwork and Partner, as well as the Leapwork Partner Program Guide. Leapwork requires that all Partners comply with the contents in this CoC as updated from time to time.

Leapwork maintains open business dealings with all Partners and strives to develop mutually advantageous relationships. Partners are therefore expected to adhere to high ethical standards and to avoid engaging in any activity that involves even the appearance of impropriety.

Integrity

Anti-corruption and anti-bribery

Leapwork is committed to conduct business in an honest and ethical manner in every country where we are present. Accordingly, Leapwork takes a zero-tolerance approach to bribery and corruption and seeks to conduct business only with Partners who act professionally, fairly and with integrity in all their business dealings and relationships, wherever they may operate. As such, Leapwork strictly prohibits our Partners from engaging in bribery – whatever its form or shape, and we expect our Partners to comply with all applicable laws and regulations on bribery and corruption including, but not limited to, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010 (UKBA) and any other applicable anti-bribery law or regulation.

Facilitating payments

Leapwork does not allow the use of facilitating payments regardless of whether it may be customary in some jurisdictions. Employees and third parties – in particular third-party intermediaries – are prohibited from making facilitating payments whether on behalf of Leapwork or not.

Bribery

The following acts are strictly prohibited (regardless of whether the item of value is accepted by the intended recipient or not):

- Offering, promising, or receiving money, or anything else of value, to or from a government official in order to secure an improper advantage, and
- Offering, promising, or receiving money, or anything else of value, to or from any individual or entity in the private sector, to obtain an improper advantage.

The above-mentioned payments are prohibited regardless of whether or not they are made directly or indirectly through third party intermediaries. The prohibitions covers e.g. cash payments, benefits and favors. It could however also cover otherwise legitimate business expenditures such as gifts, entertainment, travel, donations, sponsorships or training, unless certain conditions are met.

Antitrust and competition

At Leapwork, we are committed to conducting our business in strict compliance with antitrust laws and regulations to ensure fair competition and foster an open marketplace. Our Partners are therefore expected to adhere to the following principles:

Fair Competition

Competition shall occur fairly and honestly in the marketplace, avoiding any practices that could harm or stifle competition. Partner shall not engage in collusion, price-fixing, bid-rigging, market allocation, or any other anticompetitive behavior.

Customer Choice

The right of customers to make informed decisions based on their preferences and needs is respected. Partner will not engage in practices that restrict customer choices or hinder their ability to switch to alternative providers.

Pricing Transparency

The pricing and billing practices of our Partners must be transparent, accurate, and consistent. Partner must not manipulate prices or engage in discriminatory practices that could harm competition.

Trade controls

It is essential that our Partners comply with export control regulations applicable to their business and Leapwork, and that they provide accurate and truthful information about it to Leapwork, customs and other authorities when required. This includes e.g. avoiding business with individuals or entities of sanctioned countries.

Sustainability

Labor and human rights

Our Partners must recognize the human rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. They take responsibility for avoiding any infringements of human rights.

Employment relationships

Partner's employees hired and retained should be suitable for the job. Our business partners are committed to apply principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. People are not employed against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights. Legal minimum age requirements as outlined

in the relevant ILO conventions and the laws of the countries of operation are adhered to and children under the age of 16 are not employed.

The people our Partners deal with are treated with dignity and respect. Our Partners do not harass or discriminate, whether through culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation or age.

Working hours and remuneration must comply with laws while being fair and just. Overtime is compensated and leave is offered as required. Individual rights to freedom of opinion and association, including the right to collective bargaining, are respected.

Whistleblower protection

Our partners provide their employees and other interested parties with a mechanism to raise concerns about violation or potential violation of laws and the values provided in this Code. These concerns will be addressed in a fair and transparent way. Our business partners protect confidentiality and prohibit retaliation against those raising the concern.

Professionalism

Product Knowledge and Training

Our Partners must commit to maintaining a high level of product and industry knowledge, and are required to stay up-to-date on the [documentation related to the Leapwork Automation Platform](#). We expect our Partners to have a comprehensive understanding of the Leapwork product and understand the problems it solves and the value it provides to customers.

Feedback

Our product has been developed through a customer-centric approach, and we constantly strive to improve our product. As such, we expect our Partners to share any feedback from their customers, and to communicate any difficulties encountered in promoting or selling the product. We warmly welcome any feedback on feature requests, customer needs and pain points.

Enforcement, Reporting and Contact

Leapwork's standards can be met only with your cooperation. As such, Leapwork trusts that you will adhere to the standards of this CoC.

Any (suspected) violations of this CoC can be reported anonymously to Leapwork using the whistleblower hotline. In the event that a Partner is found in breach of this CoC, Leapwork will be entitled to terminate the Partner Agreement immediately.

If you have any questions or doubts with regards to this policy or on how to interpret the terms, please contact Leapwork at legal@leapwork.com.