Table of Contents

Introduction 3
The Code Applies to All of Us 4
Comply With Applicable Laws, Rules, Regulations and Unisys Policies 4
Avoid Conflicts of Interest 5
Maintain Accurate Books and Records 8
Deal Honestly and Fairly with Others 9
Meals, Gifts, Entertainment and Other Business Courtesies 9
Bribery is Prohibited 11
Marketing Consultants, Lobbyists and Other Third Parties 12
Hiring of Government Employees 12
Charging of Costs/Timecard Reporting 12
Respect Your Workplace 13
Use Company Resources Properly 14
Protect Confidential Information and Properly Maintain Unisys Records 16
Make Ethical Decisions 20
Associate Responsibility to Promptly Report Potential or Suspected Violations 21
For all Associates Outside of Continental Europe 21
For all Associates in Continental Europe 21
Ethics Investigations and Discipline 21
Contacting the Compliance Office 22
Introduction

As a Unisys Associate or member of the Unisys Board of Directors, you are expected to always act in accordance with our Code of Ethics and Business Conduct. Four key principles form the basis for our Code:

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

- **Respect**
  We show respect for one another by treating everyone with dignity and fairness.

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

- **Responsibility**
  We conduct our business as responsible citizens in accordance with applicable laws and regulations in each country where we operate.

While the Code does not cover every situation you may encounter, it provides general guidance. If you have questions about a particular policy, law or regulation or how to handle a situation that arises at work, refer to the Code and, most importantly, seek guidance from the Compliance Office or the Law Department.

You have the obligation and responsibility to report any suspected, potential or actual violation of the Code to your Leader, the Compliance Office or the Law Department. As a Leader, if you receive such a report, you should immediately notify the Compliance Office or the Law Department. The Compliance Office, working with the Law Department, has the responsibility to review and investigate every ethics matter.

If in doubt, contact the Compliance Office.
The Code Applies to All of Us

The Code applies to all Unisys Associates worldwide, including Associates of Unisys subsidiaries, as well as members of the Unisys Board of Directors (Directors).

It also applies to third parties representing Unisys, including consultants, agents, sales representatives and lobbyists. Associates working with third parties are required to provide them with a copy of the Code and obtain their agreement that they will comply with the Code.

Any request for a waiver of any provision of the Code must be submitted to the Compliance Office for approval. Any request for a waiver for a Corporate Officer or Director should be submitted to the Unisys General Counsel for consideration by the Audit Committee of the Unisys Board of Directors. Any waivers for Corporate Officers or Directors will be disclosed to the extent required by law or regulation.

Comply With Applicable Laws, Rules, Regulations and Unisys Policies

Unisys is a global company committed to conducting its business in full compliance with the law. You are expected to comply with all applicable laws, rules and regulations in every country, state or locality where we do business. No Associate or Director shall commit an act in violation of applicable laws or the Code of Ethics and Business Conduct, or directly or indirectly instruct, encourage or help others to do so, for any reason.

The laws governing our business have grown in number and complexity. It is not practical to think that every Associate will be fully versed in every law affecting his or her work responsibilities. However, you are expected to have a working knowledge of permissible activities in your area of work and to be familiar with the laws that relate to your activities. You should be aware of laws in the areas of antitrust and competition, export controls, anti-bribery, financial reporting, insider trading, trade secrets, environment, health and safety matters, human trafficking, privacy and data protection, confidentiality and workplace practices.

In addition to complying with the Code and applicable laws and regulations, you also are responsible for complying with Unisys policies and procedures. Unisys policies and procedures are available on the Unisys internal website.
Avoid Conflicts of Interest

A conflict of interest occurs when you have a personal interest that conflicts with the best interests of Unisys. You should avoid relationships, arrangements, investments or situations in which loyalties are divided between Unisys interests and personal interests. It is important to avoid even the appearance of a conflict of interest.

Associates who find themselves in a possible conflict of interest situation should review the issue with their Leader and the Compliance Office. Directors should raise possible conflicts of interest with the Chief Executive Officer or the General Counsel.

Consider the Following

You are considering starting an outside technology business offering services similar to those you provide through your Unisys position. Is this permissible?

This arrangement could present a conflict of interest if it interferes with your ability to perform your job at Unisys effectively and objectively or takes time away from your job at Unisys. It could also be a problem if you are competing against Unisys for the same business, or your clients might think that you are representing Unisys when in fact you are representing your own business. You must first get the approval of your Leader and the Compliance Office before starting this outside business.

Outside Employment

You are expected to devote your full efforts to performing your job at Unisys. Avoid obligations that interfere with your ability to perform your job effectively. Outside employment should never involve the use of Unisys technology or proprietary information or be done on Unisys time. Additionally, avoid any outside employment or obligation that conflicts, or even appears to conflict, with your obligations and responsibilities to Unisys.

You are home based and work as a help-desk technician that requires you to be on-call during the day for client contacts. You are considering taking a second full-time position that would also allow you to work from home. As long as you can handle both positions is it acceptable to hold two full-time jobs simultaneously?

No, this is not acceptable. Full-time Unisys Associates are expected to devote their time and efforts during their Unisys work schedule to their Unisys position only and are being paid to do so. You may not accept a second position of any type that requires you to work during the same period as your Unisys position.

Set out below are particularly sensitive areas that require careful review. Further information about conflicts of interest can be found in Ethics Policy ETH 11.0.
Outside Directorships
If you are interested in serving as a Director of an outside company you should obtain approval in accordance with Ethics Policy ETH 11.0, which details the procedures to secure the required approvals. Approval to serve as a Director of a non-profit or charitable entity does not require approval under Ethics Policy ETH 11.0.

Family and Personal Relationships
A conflict of interest may arise if a family member of a Unisys Associate or Director does business with or is employed by competitors, clients or suppliers of Unisys. Avoid conducting Unisys business with family members.

The employment by Unisys of family members, relatives or others with whom you have a close personal relationship may raise questions as to the integrity and objectivity of work relationships. While Unisys does not prohibit the employment of relatives or those in a close personal relationship, we do not allow Associates to be involved in the hiring or supervision of family members or close personal friends.

Consider the Following
Your cousin is employed by a Unisys supplier and your position involves directing business to suppliers and other third parties. Does this represent a conflict of interest?

As a general matter, it would be inappropriate for you to be in a position to decide to award business to a company where a family member or relative works. A conflict could arise if you were influenced in your decision to award the work by the fact that your cousin is employed by the supplier. This should be disclosed to your Leader and the Compliance Office. Depending on the circumstances, such as the size of the supplier and the cousin’s position, it may be necessary for you to be removed from procurement decisions involving that particular supplier, or to have any decision awarding business to that supplier reviewed by another Leader.
Personal Investments

Depending upon the facts and circumstances, your ownership of stock in a competitor, client or supplier can create a conflict of interest. Ownership of one percent or more of the stock of a competitor, client or supplier should be reviewed with the Compliance Office. A Director must remove himself or herself from any Board activity that directly affects the relationship between Unisys and any supplier, client or competitor in which the Director has a financial interest.

Ownership of less than one percent of the securities of a company that is a competitor, client or supplier of Unisys is not considered a conflict of interest under our policy.

Personal Loans

The Company is prohibited from, directly or indirectly, providing a personal loan to or for any Corporate Officer or Director. The Chief Executive Officer must approve loan requests for any non-officer Associates.

Using Corporate Opportunities for Personal Gain

You may not personally (1) take for yourself opportunities that are discovered through the use of corporate property, information or position; (2) use corporate property, information or position for personal gain; or (3) compete with the Company.

Insider Trading

Insider trading laws prohibit trading in securities of a company by a person who is aware of material nonpublic information about the company. These laws also prohibit disclosure of material nonpublic information to others who then trade, commonly called tipping.

Unisys has established an Insider Trading Policy, LEG 3.1, to promote compliance with insider trading laws by Unisys and our Associates, Officers and Directors.

Refer to the Insider Trading Policy, LEG 3.1, for more specific guidance on insider trading or contact the Law Department or the Compliance Office.

Consider the Following

In talking with a co-worker, you learn Unisys is in discussions to acquire a small technology company. You and the co-worker are considering buying stock in the technology company before the acquisition is announced to the public. Is this acceptable?

You may not purchase stock in the technology company until the news of the acquisition is made public. Insider trading laws prohibit you from trading in Unisys stock or the securities of our acquisition or merger targets, clients, partners or suppliers when you have information about these companies that could be viewed as significant to an investor and is not yet in the public domain.
**think ETHICS.**

## Maintain Accurate Books and Records

You are expected to create all company records fairly and accurately and in accordance with all laws, rules and regulations. You must always disclose and report financial information in an accurate, timely and honest manner. This includes invoices, sales records, travel expense reports, time records and all public reports and filings. False, incomplete or misleading entries or records must not be created under any circumstances.

All Unisys payments and other transactions must be properly authorized and approved by leadership and recorded on Unisys books and records in a timely and accurate manner in accordance with generally accepted accounting principles and established corporate accounting policies. You also must comply with the applicable accounting requirements of each country in which Unisys operates. Our financial representations to the external markets are based on our books and records and it is critical that they be accurate in all respects. All payments and other transactions must be processed through established company accounting systems, which are part of the company’s internal controls. The Unisys internal control policies and procedures are described in more detail in the Unisys Financial Manual (UFM).

Internal time records should accurately reflect all hours worked and time should be charged to the proper code (administrative code or project code). In no cases should time be applied to different projects or codes other than those for which the time was actually spent. In addition, it is not acceptable to record only part of the time worked on a project. Time records must be accurate in all respects.

No undisclosed or unrecorded corporate funds should be set aside or designated for any purpose, nor should Unisys funds be placed in any personal or non-corporate accounts.

### Consider the Following

<table>
<thead>
<tr>
<th>A government business unit already has made its numbers for the year and will be receiving additional revenue before year end. Leadership would like to hold back the additional revenue and report it in the first quarter next year. Is that permissible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. All revenue must be recorded in the period it is actually realized.</td>
</tr>
</tbody>
</table>

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<tr>
<th>It is the last day of the quarter, Friday, September 30, and you have reached agreement with the client on all essential terms but are waiting for final confirmation of a few minor provisions. On Saturday, October 1, you receive confirmation of the additional provisions and both parties sign the agreement but agree to date their signatures with the date of September 30. Is this ok?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No, even though only minor issues remained open, you did not sign the agreement until October 1 and you must represent the date of your signature to be the true date.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>A client asks you to delay invoicing for goods already delivered so he can postpone payment until the following quarter. What should you do?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The request is improper and you should tell the client that Unisys will invoice them in the normal course, in accordance with our established policies and procedures.</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>You work full time on a project but your Leader tells you to only charge 30 hours to the project and 10 hours to an administrative account that is not connected to the project. Is this acceptable?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. You must accurately charge all of the hours you work to the proper project codes at all times. Doing otherwise creates a false record and is a violation of Unisys internal controls. Each Associate is responsible for his or her time record and must always report their time accurately and honestly.</td>
</tr>
</tbody>
</table>
Deal Honestly and Fairly with Others
Associates and Directors should always deal honestly and fairly with our clients, partners, suppliers and competitors as well as with each other.

Human Rights
Basic human rights should always be respected. Therefore, all forms of slavery, human trafficking, forced labor, and child labor as defined by applicable law is prohibited within the Company’s operations, including in our supply chain.

Meals, Gifts, Entertainment and Other Business Courtesies
Providing Gifts, Entertainment or Other Business Courtesies
While exchanging business courtesies for the purpose of creating good will and promoting sound business relationships is a common and accepted practice, it is important that it be done in a careful and measured way. It is Unisys policy to permit the giving of reasonable and customary business courtesies to current and prospective Unisys clients in accordance with applicable laws and regulations, our Code and Ethics Policy ETH 6.0.

Business courtesies must never be given for the purpose of obtaining an improper business advantage or to influence the client inappropriately. Providing excessive and non-customary business courtesies could be viewed as improper and even illegal and should not be done. Careful attention should be given to the frequency of business courtesies given to the same individual to avoid the appearance of impropriety.

Specific guidance by country, including monetary ranges for gifts, meals and entertainment, and other country specific information is provided in Schedule A to ETH 6.0 and posted at the Unisys Ethics website at https://unisyscorp.sharepoint.com/sites/ethics/default.aspx.

Consider the Following

A government client is visiting a Unisys facility for a product demonstration. Can you provide lunch?

The rules differ among the various government clients and by country around the world. In many instances, it would be permissible to provide lunch for the government client as long as the cost of the lunch was reasonable and customary and not excessive. You should confirm the client is permitted to accept lunch under their internal guidelines and review the country level guidance found in Ethics Policy ETH 6.0 to ensure the cost of the lunch is within reasonable and customary guidance for the country and otherwise permitted. If it is not permitted under the country guidance, approval from the Law Department or the Compliance Office must be received before offering the lunch invitation.

In your country it is common and considered appropriate to offer gifts to clients during the holiday season. You would like to send gifts to your government and commercial clients. Is there any problem with this?

As long as the value of the gifts are reasonable and customary, do not exceed the values provided for in the country guidance that are a part of Ethics Policy ETH 6.0, are not prohibited by the client’s internal guidelines and the gifts are not intended to improperly influence any business decisions, you may send the gifts with your leadership’s approval. If the gifts exceed the standards in the country guidance, you should review it with the Law Department or the Compliance Office before sending the gifts.
**Accepting Gifts, Entertainment or Other Business Courtesies**

You may only accept gifts of nominal value, and may only accept business courtesies that are reasonable in amount, appropriate, infrequent and in accordance with customary and accepted business practices. Gifts, entertainment or other business courtesies should relate to the business interests of the Company. Associates should not accept reimbursement for lodging or travel expenses, except for limited local travel, without the approval of your business unit head and the Law Department or the Compliance Office.

Do not accept any gifts, entertainment or other business courtesies that may be perceived as influencing your judgment.

You may never accept any gift of cash or cash equivalents such as gift cards or securities. If you are offered a gift that you may not accept under the provisions of the Code, you should immediately inform leadership. You should refuse or return the gift with an explanation that the Unisys Code prohibits your acceptance of the gift. Where local custom outside the United States would make refusal of the gift awkward or possibly insulting, you may accept the gift on behalf of the Company, if lawful. Such gifts should be turned over to the Compliance Office for appropriate disposition, such as Unisys internal use, general Associate benefit or donation to charity.

**Consider the Following**

**You and your spouse are invited to attend a client appreciation event at a resort with all expenses paid for by the supplier. Can you and your spouse attend?**

You should not attend if the event is designed for recreational and personal benefit and does not have a genuine business purpose. If there is a real and significant business purpose and the value of the invitation is reasonable, you may accept the invitation after receiving the approval of your business unit head and the Law Department or Compliance Office.

We are in the middle of an open procurement and considering several proposals from various suppliers. You are on the team that will decide which proposal is selected. One of the suppliers bidding on the work invites you to play golf. Can you accept the invitation?

In this case, you should not accept the invitation given the pending open procurement and your role as a decision maker with that procurement. The invitation could be an attempt by the supplier to influence your judgment in the supplier’s favor. While playing golf with a supplier might be a customary business practice and may be acceptable in some cases, in this example, accepting the invitation could create the perception of a conflict of interest and should be avoided.
Bribery is Prohibited

Unisys strictly prohibits bribes, kickbacks, payoffs or any other form of improper payments. You must comply with all anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (the “FCPA”), the U.K. Bribery Act, and other anti-bribery laws in the countries in which we operate.

In accordance with anti-bribery laws, you must not directly or indirectly give, offer or promise an improper payment to others for the purpose of obtaining an improper business advantage or to influence any person inappropriately. Improper payments can include, among other things, providing excessive or frequent business courtesies (such as meals, entertainment and gifts), making charitable donations, paying travel expenses or making facilitating payments. You are prohibited from making improper payments to both government and commercial sector clients and prospective clients as well as to government officials. This prohibition also applies to third parties who are retained to represent Unisys. In addition, all payments and other transactions must be properly authorized and accurately recorded on company books and records and made in accordance with Unisys internal controls.

Unisys has a separate Anti-Bribery Policy, ETH 2.0 that all Associates should review and understand.

Consider the Following

To help win a major foreign government contract, we have retained a third party government marketing consultant who the client knows and trusts. The consultant recommends that we consider offering the government procurement official an all-expenses-paid vacation. To avoid the appearance of impropriety, we plan to have the consultant offer the government official the vacation.

This is prohibited. Unisys would be offering something of value (all-expenses-paid vacation) to a government official (government procurement official) for a business advantage (to ensure a successful bid). The fact that we have a consultant extend the trip invitation does not relieve us of responsibility or liability. Anti-bribery laws prohibit us from using a third party to facilitate making a payment or gift to a government official.

We are pursuing a large contract with an insurance company. Two other companies are competing for the contract. The insurance company CIO tells our sales person that he is leaning towards awarding the contract to Unisys, but wants us to give a contract for $100,000 in services to a small company owned by his brother. The CIO tells the sales person that this is a way for us to show our loyalty to him.

This is improper and should not be done. The CIO is soliciting a contract for his brother’s company in exchange for awarding Unisys the contract. Even though the thing of value is not given directly to the CIO, it appears that this would be an indirect benefit for the CIO and he is soliciting this as something of value in exchange for awarding us the contract.
Marketing Consultants, Lobbyists and Other Third Parties

Before retaining lobbyists, consultants and other third parties to assist in marketing our products and services to government clients, we need to take special steps to ensure that these third parties adhere to the various laws and regulations that apply in this area. We should consider only reputable and qualified agents or firms. We need to ensure that we know what work they will be doing on our behalf and that the compensation to be paid is reasonable for the services provided. Consultants, lobbyists and third parties engaged by Unisys will be required to abide by the standards of the Unisys Code of Ethics and Business Conduct and must never be retained to circumvent our ethical standards.

Government Relations Policy GR 1.0 governs the retention and renewal of government marketing consultants and lobbyists around the world.

Hiring of Government Employees

In some countries, local laws, regulations, or governmental policies may restrict the recruitment and employment of current and former government employees, both military and civilian, by private industry. Various rules and requirements limit both pre-hiring and post-hiring activities. If you are considering hiring a person who is or has been employed in a governmental position, you need to first consult with your Human Resources representative to be certain all applicable regulations are understood and complied with. Cases where hiring may be restricted must be reviewed by the Law Department or the Compliance Office to ensure that all applicable laws and regulations are being followed.

Charging of Costs/Timecard Reporting

Associates working with government clients must use special care to ensure that hours worked and costs incurred are accurately recorded and applied to the contract or project for which they were incurred. No cost may be billed to a contract with any government or governmental entity if the cost is not allowed by law or the terms of the contract. A separate policy on timekeeping for Unisys Federal Systems Associates can be found at UFS.FIN.201.04.
Respect Your Workplace

Diversity and Workplace Practices
Unisys is committed to creating a business environment where diversity is respected, sought and valued. We want to create an inclusive environment where different perspectives are welcomed and the individuality of all Associates is respected. For more information, refer to the Company’s Human Resources policies.

Harassment or discrimination of any kind related to race, color, religion, gender, age, national origin, citizenship, disability, sexual orientation and veteran or marital status is unacceptable and will not be tolerated.

Environmental, Health and Safety Guidelines
Unisys is committed to providing a safe and healthy workplace. It is Unisys policy to comply with all applicable environmental, health and safety laws and regulations. You are responsible for conducting your work in a manner that is safe to you and those around you, observing posted warnings and regulations and for reporting any accident or injury sustained on the job to leadership. Specific environmental, health and safety issues are addressed in the Company’s Environmental, Safety & Health Policies.
Use Company Resources Properly

You are required to protect and ensure the proper use of Company assets.

Communication tools and devices, and the Internet

Unisys provides communication tools and devices, as well as Internet access, for company business-related purposes. From time to time Associates may use these systems for personal communications but these should be brief and kept to a minimum.

Company-provided access to these resources is to be used as a tool to accomplish business tasks. For example, Associates may not use these systems:

- for any illegal activities;
- to view or communicate obscene, hateful, discriminatory or harassing material;
- for an outside business;
- for gambling;
- for uploading or downloading software in violation of its copyright and uploading or downloading software that is subject to export controls; or
- for non-business related streaming media such as Internet radio, portable music files, or sports video.

All electronic communications transmitted and/or stored via e-mail, voice mail, instant messaging systems and information of any kind stored on Unisys equipment are considered Unisys property. Unisys has the right to audit or monitor these systems. Users should not have any expectation of personal privacy for messages or information using Company communication tools and devices, Internet or other systems. For more information on this subject, see Information Technology Worldwide Policies UIT 2.2, 2.3, 2.4, 2.5, 2.7 and 3.1.

Consider the Following

From time to time you use your Company-provided Internet and e-mail access for personal use, like communicating with family members, checking on your investment portfolio and shopping on-line. Is this acceptable?

Communication tools and devices, as well as Internet access are provided by the Company to facilitate the performance of Company work and are intended for business related purposes. We recognize that Associates may occasionally use these systems for personal reasons. The key, however, is that this must be done only on an occasional and limited basis. Regular and extended use of these systems for personal reasons is not acceptable.
Political Contributions and Activity

Company funds, products, services, or other Company resources may not be contributed directly or indirectly to any elected officials, political candidates or parties at the U.S. federal level.

At the State, local and international level, Corporate resources may in certain limited circumstances be contributed to elected officials, political candidates or parties to the extent permitted by law. Unisys support of any activity under the sponsorship of a political party, an elected official, an announced candidate for elected office, or any group of such entities must be approved in accordance with the delegation of authority, Unisys Financial Manual Policy UFM 2.1, and Ethics Policy ETH 7.0. Unisys has established a political action committee in the United States called the Unisys Associates Political Action Committee (UPAC). UPAC accepts Associate contributions in order to make political contributions to U.S. federal, state and local candidates supportive of the interests of Unisys Associates. All contributions to UPAC are voluntary, and Associates may choose not to contribute without fear of reprisal.

Unisys understands and supports the right of Associates to participate in an individual capacity in the political process outside of the workplace. However, personal contributions and political activity must never be represented as coming from Unisys or as reflecting Unisys sponsorship. You may not seek reimbursement from Unisys for any personal political contribution.

Support of Non-Profit Organizations and Other Activities

Unisys support of any (1) non-profit organization or event that benefits a non-profit organization or (2) other events such as sporting events or concerts needs to be approved in accordance with the Unisys Delegation of Authority, Unisys Financial Manual Policy UFM 2.1 and Communications Policies COM 2.1 and 2.3.
Protect Confidential Information and Properly Maintain Unisys Records

Unisys Confidential Information

Unisys confidential business information is Company property. You should take appropriate steps to ensure that any Company confidential information, wherever it is stored, is safeguarded against external disclosure as well as from unauthorized disclosure within Unisys. Confidential information includes business, financial or marketing plans, client lists, proposal or pricing information, Associate personnel information, technical designs, pending or potential acquisitions or divestitures, business methods, manufacturing processes and internal discussions.

If business needs dictate releasing or sharing sensitive information, appropriate protection should be obtained. You should consult with the Law Department or the Compliance Office to assist you in protecting the confidentiality of the information. Refer to Legal Policy LEG 6.1 for further guidance on these issues.

You may not use any Company confidential information for your own personal benefit. This restriction extends indefinitely, even beyond your employment or service on the Board of Directors.

Each of us has a responsibility to prevent information from being used inappropriately.

Refer to Legal Policy LEG 6.1 for further guidance on these issues.

Consider the Following

Your Leader has instructed you to share your password with a co-worker to help handle a heavy workload so we continue to meet client SLA’s (Service Level Agreement). Should I do it?

No. Never share your passwords or user ID with anyone including your Leader or co-workers. Sharing passwords can create the opportunity for fraud by allowing improper access to client information. All Associates are responsible for maintaining the confidentiality of their passwords and user ID’s. Review the company Information Security Policy (UIT 3.1) for more information on password security.
Confidential Information of Others

Just as we endeavor to protect our information, other companies do so as well. You may not solicit, receive or use any confidential information belonging to others without proper authorization. Acceptance of confidential information can give rise to significant legal obligations and potential liability for both you and Unisys. If you handle confidential information of others in the course of performing your duties for Unisys, you should apply at least the same degree of care to avoid loss, misuse or unauthorized disclosure of such information as you apply to Unisys confidential information of a similar kind. If you receive confidential information of another company that is not already subject to a nondisclosure agreement or other form of protection, contact the Compliance Office or the Law Department to assist you in handling the information.

Information about our clients, suppliers, competitors, partners and consultants that is already published, in the public domain, or independently developed, is not considered to be confidential. However, if that information has any confidential or proprietary markings, you must contact the Compliance Office or the Law Department before using or distributing the information.

You may not use third parties to improperly acquire the confidential information of others.

Refer to Legal Policy **LEG 6.1** for further guidance.

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Consider the Following

**While in the process of preparing our bid for a large government contract, a member of the bid team is offered a copy of a competitor’s bid that includes their pricing and cost information. The document is labelled “Confidential”. Can we accept and use the information?**

The fact that the confidential legend was included on the documents indicates that the information is expected to be treated in confidence and that the other company has placed limitations on its use. Having access to this information gives Unisys an unfair and unacceptable advantage over the other bidders. The prudent course of action would be to not accept the materials or to obtain them under a written nondisclosure agreement that has been approved by the Law Department. Acceptance of confidential information of others without adequate protections could cause us to be disqualified from the bid and subject both the Associate involved and Unisys to penalties.
Privacy Protection of Personal Data

Personal data is any information that can be used directly or indirectly to identify a specific living individual (including without limitation, information such as an individual’s name, address, phone number, e-mail address, Associate number, Social Security number, national identifier or credit card number). Personal data may include sensitive categories of information (including without limitation, racial or ethnic origin, political opinions, religious beliefs, trade union membership, health or sexual orientation).

Unisys is committed to complying with our Global Privacy Policy on Personal Data. This means each Associate, and others acting on the Company’s behalf, are required to be responsible for understanding what personal data they are handling and ensuring that such handling complies with applicable law, contractual agreements and all Company Policies.

For more information regarding how to handle and protect personal data, visit the Global Privacy Program portal on the Unisys internal website or contact the Compliance Office or the Law Department.

Software and Copyright Compliance

Unisys obtains licenses for many of the software products used in its business. U.S. and international copyright laws protect a software owner’s rights in its programs by prohibiting the copying, distribution and use of such software without the owner’s express permission (for example, a license agreement). You should ensure that your copying, use, installation, transmission, modification, storage, repackaging or distribution of software complies with applicable laws (such as copyright law), applicable license agreements (whether commercial, open source or otherwise), and Company Policies (including Legal Policy LEG 4.1).
think ETHICS.

U.S. Government Classified Information and Unclassified Sensitive Information

We have special obligations to comply with laws and regulations that protect U.S. government classified information and unclassified sensitive information. Associates and Directors who have access to such information need to handle the information in accordance with applicable U.S. government procedures. If you are not familiar with these governmental procedures or if you have questions about handling such information, consult your security officer or the Law Department.

Unisys Records Management

Unisys records are a valuable corporate resource. Unisys “records” are any written, printed or electronically recorded information. To protect this resource, you need to take steps to be sure that Unisys records are managed and controlled in accordance with accepted record keeping practices, as established by the Unisys Records Management Policy and Program.

Records should be kept only as long as needed for business purposes, but should not be kept more than three years after their creation or three years after the completion of the project or ongoing activity to which they relate (whichever occurs later). There are a few exceptions to this rule. If litigation or an outside investigation is imminent or pending, you should not discard or destroy records related to the matters. In addition, a different retention period may be dictated by contract and certain records may require different retention periods depending on the type of record or local laws. The Unisys Retention Schedule in Records Management Policy RMP 1.0 provides the different retention periods, organized by record type.

Each Associate is individually responsible for implementing the Records Management Policy with respect to records within their control. To assure you are properly managing your records, refer to the Records Management Policy RMP 1.0 and the Retention Schedule. Contact your Leader or the Unisys Records Program Leader with any questions.
We are all accountable for our behavior at work. When you face a situation not covered in our Code of Ethics and Business Conduct, ask yourself these questions before taking action.

If YES to ALL, it’s probably OK to proceed.  
If NO to ANY, it’s NOT OK to proceed.

Still not sure? Seek HELP and be Accountable. Contact the Unisys Compliance Helpline.
Associate Responsibility to Promptly Report Potential or Suspected Violations

For all Associates Outside of Continental Europe
You have a responsibility and an obligation to report promptly any suspected, potential or actual violation of the Code to your Leader, the Compliance Office or the Law Department. If any Leader receives such a report, the Leader must immediately notify the Compliance Office or the Law Department. The issue should be reported even if you believe the issue may have been resolved or if you are not sure whether it constitutes a violation or not. Do not attempt to investigate the issue yourself. In addition, you must promptly report any complaint regarding any accounting, internal accounting control or auditing matter to the Compliance Office or the Law Department.

You may contact the Compliance Office on a confidential or an anonymous basis, without fear of retaliation. No adverse action or retribution will be taken against anyone for making a good faith report of a suspected ethics violation. Anyone taking or attempting to take any such retaliation will be subject to disciplinary action.

For all Associates in Continental Europe
We expect you to report promptly any suspected, potential or actual violations of the Code. Any suspected, potential or actual violation of the Code related to finance, accounting (including internal accounting controls and auditing matters) and banking matters, as well as to applicable anti-corruption, competition (anti-trust) laws, discrimination and harassment at work, health, safety and environmental laws should be immediately reported to the Compliance Office or the Law Department.

Any suspected, potential or actual violations of the Code relating to all other matters should be raised with your local or regional Law Department representative.

The issue should be raised even if you believe the issue may have been resolved or if you are not sure whether it constitutes a violation or not. Do not attempt to investigate the issue yourself. You may raise issues on a confidential basis without fear of retaliation. No adverse action or retribution will be taken against anyone for making a good faith report of a suspected ethics violation. Anyone taking or attempting to take any such retaliation will be subject to disciplinary action.

Ethics Investigations and Discipline
The Compliance Office is responsible for investigating possible violations of the Code, including any complaint regarding accounting, internal accounting controls or auditing matters. You are required to cooperate fully with any internal investigation. Corrective measures, including disciplinary actions, will be taken for violations of the Code. Disciplinary action can include a warning or reprimand, suspension without pay, demotion or termination. You will be given an opportunity to explain your actions before any disciplinary action is imposed.

With respect to complaints regarding accounting, internal accounting controls or auditing matters, the investigation findings and any recommendations for corrective action will be reported to the Audit Committee of the Board of Directors for its review and approval. Other Code violations and the corrective actions taken will be reported periodically to the Audit Committee.
This document constitutes Ethics Policy 1.0. Printed versions of this document may not be current. Verify the effective date with the Unisys Policies & Procedures website at https://unisyscorp.sharepoint.com/sites/corporatepolicies/default.aspx

Note for all Unisys Associates Located in the United States

Nothing in this Code of Ethics and Business Conduct is intended to create an express or implied contract of employment. The maintenance of this Code or other policies, procedures, or benefit plans does not modify the employment-at-will relationship that exists between Unisys and its Associates. Any claimed exception must be in writing and signed by the Senior Vice President, Worldwide Human Resources.