

Supplier Code of Conduct





Introduction

Dynatrace is committed to conducting its business in an ethical, legal, and socially responsible manner, embracing internationally recognized standards for business integrity, human rights, and environmental sustainability. We see this as a shared commitment that extends to our vendors, contractors (including subcontractors), consultants and other providers (each a “Supplier”).

This Supplier Code of Conduct (“Code”) defines the basic business practices we require of our Suppliers and should be regarded as a minimum standard that operates in addition to, and not in replacement of, a Supplier’s existing legal and contractual obligations to Dynatrace. Dynatrace reserves the right to audit Supplier’s compliance with this Code. We reserve the right to review, suspend, or under the appropriate circumstances, terminate any or all of our contractual relationships with a Supplier that is found to be in breach of this Code. We reserve the right to review and update this Code in our sole discretion.

Compliance with Law

Dynatrace expects all Suppliers to conduct business in full compliance with all applicable laws and regulations of the United States and in all countries where Supplier conducts business, including but not limited to compliance with:

- Trade controls, international sanctions, as well as all applicable export, re-export and import laws and regulations.
- Antitrust and fair competition laws.
- All laws and regulations on bribery, corruption, money laundering, terrorist financing, and prohibited business practices, including but not limited to (i) the U.S. Foreign Corrupt Practices Act, the United Kingdom Bribery Act and other anti-corruption laws, (ii) laws governing lobbying, gifts, and payments to public officials, and (iii) political campaign contribution laws.
- All laws and regulatory requirements related to personally identifiable information, privacy, and information security, and the maintenance of privacy and security policies that meet or exceed all applicable data protection laws.

Suppliers supporting U.S. government contracts or subcontracts must follow all applicable Federal Acquisition Regulations (FARs).

Ethics and Business Integrity

Supplier must conduct their business interactions and activities with integrity:

- Dynatrace is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials or other third parties are strictly prohibited. Corruption, in any form, including bribes, kickbacks, or inappropriate gifts and/or entertainment, will not be tolerated.
- Suppliers must not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses, and charitable donations) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office to (i) improperly influence any act or decision of the official, employee, or candidate for the purpose of promoting the business interests of Dynatrace or of Supplier in any respect, or (ii) otherwise improperly promote the business interests of Dynatrace or of Supplier in any respect.



- Supplier may not make public communications on Dynatrace's behalf without Dynatrace's prior written consent.
- Supplier should avoid the appearance of impropriety, as well as conflicts of interest, as noted below.
- As Dynatrace is a public company in the United States, Supplier must ensure that its officers, employees, and other representatives (i) comply with insider trading laws and regulations and its own internal policies governing trading of publicly traded securities, and (ii) refrain from trading securities of Dynatrace or any other issuer based on non-public information regarding Dynatrace, and from providing such information to others.

Conflicts of Interest

A "conflict of interest" occurs when the personal interest of a director, officer or employee interferes with the company's interests. Suppliers should avoid even the appearance of impropriety and must avoid actual or potential conflicts of interest. Examples of potential conflicts of interest include, but are not limited to:

- Dynatrace employee(s), officer(s), or other representatives have a financial interest in, or any other personal relationship with, Supplier.
- Acting on confidential information obtained from Dynatrace in a manner not authorized by Dynatrace or for personal gain.
- Attempting to win business for any reason (including based on personal relationships) other than price, quality, performance and suitability of the product or service.
- Accepting loans or favors that the Supplier, a Supplier employee, or a family member receives through the Supplier's relationship with Dynatrace.

Each of these situations, and any other situation where there is a possible conflict of interest, should be reported to Dynatrace. Often, an apparent conflict can be resolved during the disclosure process. All actual or potential conflicts of interest, and related concerns, should be reported as described below under "Questions and Concerns".

Respect for Human Rights

Dynatrace expects its Suppliers to share its commitment to human rights and fair labor conditions and to treat all workers with dignity and respect. Suppliers must provide and maintain a safe and ethical workplace and require the same from their own suppliers, including at a minimum, ensuring they and all of their operations:

- Promote equal opportunities and treatment of all employees and a workplace environment that is free from discrimination, exploitation, harassment, or other unacceptable treatment of individuals.
- Treat employees with respect and dignity and observe rights to freedom of association and collective bargaining; respect the right of employees to join employee organizations or trade unions, as permitted under local laws.
- Prohibit the use of forced or involuntary labor – including prison, indentured, bonded, or slave labor – and any engagement in human trafficking.
- Prohibit the use of child labor and only employ individuals who meet applicable legal age requirements in the Supplier's countries of operation.
- Comply with all applicable wage and hour – including overtime – labor laws in the Supplier's countries of operation.



- Provide workers with a safe and healthy environment that is fully compliant with applicable occupational health and safety laws.
- Prohibit violent behavior including through mental cruelty, harassment, discrimination, gestures, language, physical contact, and exploitation.
- Provide fair compensation and comply with all applicable wage laws, including, but not limited to, those relating to minimum wages, overtime hours, and all applicable regulations.

Diversity and Inclusion

Dynatrace is committed to employing and strengthening our diversity and inclusion strategies and practices, and we expect our Suppliers to promote their own initiatives for achieving equity and inclusion in the workplace. This includes efforts to source diverse suppliers (including actively supporting women, minority, LGBTQ, veteran, and disadvantaged owned businesses), regular engagement with company executives on diversity measures, and efforts to reflect a diverse range of perspectives among leadership and company personnel. Dynatrace does not tolerate discrimination and will not conduct business with any company that does not demonstrate the same values of acceptance and inclusion for all.

Environmental Responsibility

Dynatrace is committed to help protect the environment and has adopted sustainability and other initiatives to reduce its environmental impact. We expect our Suppliers to adopt policies and practices to reduce environmental impact, including in such areas as GHG emissions, energy efficiency, renewable energy, water quality and consumption, air quality, sustainable resources management and waste reduction, and responsible chemical management, as relevant to Supplier's business, and to set similar expectations for its suppliers. Our Suppliers must follow all applicable environmental laws, regulations, and standards, as well as the operational and reporting requirements of environmental permits and registrations.

Protection of Assets and Intellectual Property

Supplier must respect and protect the valid and legitimate intellectual property rights of Dynatrace, its customers, and others (including, without limitation, patent, trademark, copyright, and trade secret rights) and use those rights only in accordance with valid licenses, terms of use, or other relevant contractual provisions. Suppliers must notify Dynatrace of any unauthorized use of Dynatrace's technologies, products, copyrights, trademarks, trade secrets, proprietary or confidential information by a third party.

Supplier shall respect intellectual property rights and safeguard customer information. Supplier shall manage technology and know-how in a manner that protects intellectual property rights and use reasonable efforts to safeguard Dynatrace's confidential information against improper use or disclosure.

Supplier shall comply with all Dynatrace requirements and procedures for maintaining passwords, confidentiality, security, and privacy as a condition of providing Dynatrace with goods or services or receiving access to the Dynatrace internal corporate network, systems, and buildings.

Business Records and Practices

Supplier shall accurately and completely record all business information and comply with all applicable laws regarding accounting and other business records.

Supplier shall prepare in an accurate, truthful, and complete manner, all documents used in its operations and in connection with its business dealings with Dynatrace and Dynatrace's customers, including without limitation proposals, statements of work, KYC documentation, and invoices for goods delivered, services provided, and other costs.



Supplier shall be honest, direct, and truthful in discussions with Dynatrace, regulatory agency representatives, and government officials.

Supplier should establish an enterprise risk management system that is designed to ensure (i) compliance with applicable laws and regulations, and (ii) identification and mitigation of operational and business continuity risks. Supplier should also facilitate continual improvements of and to such a system.

Questions or Concerns?

Dynatrace encourages its Suppliers to feel comfortable raising concerns and seeking guidance. Voicing concerns helps Dynatrace and its Suppliers to do business ethically by proactively addressing potential issues.

Suppliers are obligated to report any actions that they believe to have taken place, may be taking place, or may be about to take place that violate or would violate this Code or any law, rule, or regulation applicable to Dynatrace. Any such concern may be reported to concerns@dynatrace.com or according to the procedures located at www.dynatrace.com/ethics. Dynatrace expects Suppliers to cooperate fully with any resulting investigation, and we will make every effort to protect confidentiality and, where permitted by local law, anonymity. We will not retaliate against, or tolerate retaliation by any other person against, anyone who in good faith reports a violation or suspected violation of this Supplier Code of Conduct.