

Code of Ethics and Business Conduct

INTRODUCTION

We at Hitachi Vantara believe that high ethical standards are the foundation of both a successful business and a great work environment. Customer loyalty and respect from the communities in which we operate are earned from our reputation as a fair and honest company. We have the utmost confidence in the values and ethics of our employees. We also recognize that our complex business environment can create uncertainty about how to uphold the Company's ethical standards. The purpose of this Code of Ethics and Business Conduct ("the Code") is to articulate the Company's commitment to ethical business practices in a number of different areas and to help you navigate potentially challenging situations.

The maintenance of a culture of compliance is everyone's responsibility, so we must all:

- Provide a work environment in which ethical conduct is recognized and valued
- Set a good example and encourage others to comply with the Code
- Assist fellow employees who raise questions or concerns about ethics and legal compliance
- Take assigned compliance training courses, which are mandatory for all employees
- Cooperate when requested with any investigation of a violation of the Code

The Code focuses on five areas:

Personal Conduct

Lawful and Ethical Behavior

Company Assets

Data Protection

Conflicts of Interest

You will see that some sections include an underlined word or phrase, with the meaning set out later in the section. If you need clarification, information on a specific topic, or the answer to a question that the Code does not cover directly, please contact the Legal and Compliance Department ("Legal and Compliance").

Hitachi Vantara considers any violation of the Code, including failure to take assigned training courses, to be a serious issue. Violators will be subject to appropriate disciplinary action, up to and including termination of employment and possible further legal recourse. If you encounter or suspect any violation of the Code, you should promptly report it to your manager, HR or Legal and Compliance. This may be done anonymously if you prefer.

And always remember: **Hitachi Vantara prohibits harassment of or discrimination or retaliation against any current or former employee who:**

- **Seeks guidance concerning the Code**
- **Reports a violation in good faith to the Company or to any government or law enforcement agency**
- **Refuses to participate in a breach of the Code**
- **Cooperates with an investigation of a violation of the Code or any Company policy**

PERSONAL CONDUCT

A. Work Environment

Hitachi Vantara is committed to provide a healthy, safe and productive work environment, so we are expected at all times to act respectfully towards our co-workers, avoiding in particular any form of **Harassment** or **Discrimination** based on the following categories protected by law: race, ancestry, color, religion, politics, military service, sex, gender, sexual orientation, marital or family status, pregnancy, age, national or ethnic origin, disability, or genetic information.

*Meaning of **Harassment**:* Unwelcome behavior aimed at an individual based on one or more of the legally-protected categories listed above, that is sufficiently serious to affect materially that individual's work environment. It is the reaction of the person targeted that matters, not the intent of the harasser.

*Meaning of **Discrimination**:* Taking adverse employment action on the basis of one or more of the legally-protected categories listed above, including: refusal to hire or promote; demotion or termination; material negative change in work status, compensation or benefits; or unfavorable performance reviews or discipline.

Work Environment FAQs:

Someone said something I find personally offensive, but it does not fall under these protected categories? Can I still report it?

Hitachi Vantara prides itself on providing a healthy, safe, and productive work environment. If a comment or behavior makes you feel uncomfortable or unsafe in your work environment, you should report this concern to your manager or to HR.

You may also call the hotline 1-877-437-ETHX (3849) in the U.S. or Canada.

International phone numbers are listed at:

<https://www.HitachiVantara.com/en-us/contact/compliance-reporting-phone-numbers.html>

Or you may report online at:

<https://www.reportlineweb.com/Welcome.aspx?Client=Hitachi>

Can I ask a question without making a report?

Yes. If you have an ethics question, send an email to ethics@HitachiVantara.com. If you are unsure that you've witnessed an ethical violation, you may either:

Call 1-877-437-ETHX (3849) in the U.S. or Canada

International phone numbers are listed at:

<https://www.HitachiVantara.com/en-us/contact/compliance-reporting-phone-numbers.html>

Or you may report online at:

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During a department presentation, I asked a question. I felt the response I received was abusive and I felt humiliated. Several other people in the room could be heard laughing.

The Company encourages open communication, differing opinions on issues, and healthy debate when decisions are being made. However, when we disagree it must be done professionally and respectfully. Talk to the individual who made you uncomfortable, contact your supervisor, or report through the hotline or report line.

B. Social Media

Hitachi Vantara recognizes the value of social media and understands that its proper use can be a business advantage. On the other hand, since communication is now almost nonstop and instantaneous, there is a significant risk of errors in tone, content and distribution. You are expected to be accountable for what you publish on social media, particularly if you comment on the Company, your job or your work colleagues. If you do make mistakes, own up to them and always ensure that you are being truthful and respectful. Remember that social media is global, so be particularly sensitive to content with geographic, ethnic or religious elements. And be in no doubt that you will always be required to protect confidential information of both Hitachi Vantara and third parties.

Social Media FAQs:

I have an online blog about technology. Can I disclose that I work for Hitachi Vantara?

You may disclose that you work for Hitachi Vantara, but only trained and certified Hitachi Vantara ambassadors are approved to publish and respond on behalf of the Company. If you have any questions, please contact socialmedia@HitachiVantara.com.

I think I have a good sense of humor, but it can be somewhat biting and even borderline mean at times, particularly when I am on social media. Should I tone it down a bit?

Yes. Too many users of social media tend to think that they are operating anonymously, or at least outside societal norms. Without expecting every online comment to be evaluated as though Grandma is going to read it, the Company does require its employees to be respectful and honest when communicating on social media.

LAWFUL AND ETHICAL BEHAVIOR

A. Relationships with Customers

Hitachi Vantara places the highest value on our interactions with customers, recognizing that a long and fruitful customer relationship is one of our most valued assets. We must always act in good faith in dealings with Hitachi Vantara customers, by representing our products, services and capabilities accurately, by making competitive comparisons fairly, and by promising only what can be delivered ethically and legally.

Customer Relationship FAQs:

We're having a large meeting of Hitachi Vantara customers and want to have a prize drawing. Can I do this?

Prize drawings are regulated in a number of countries, particularly in Europe, so you should first speak to Legal and Compliance. In any event, government employees, Hitachi Vantara employees and Hitachi Vantara contractors may not participate. The drawing must be pure chance, the prize should be merchandise and absolutely no cash or cash equivalent prizes are allowed. The value of each prize should be reasonable for the number and type of participants and comply with Hitachi Vantara expense guidelines.

B. Relationships with Competitors

Hitachi Vantara complies with **Antitrust** and competition laws in all countries in which we do business and everyone is required to compete lawfully and ethically. These expectations do not preclude cordial relationships with our competitors, but because of competition laws you must be particularly careful dealing

with such companies, which may also be suppliers, customers, or even partners when we are bidding in competition with our partners. Please speak with Legal and Compliance if faced with this type of situation.

Meaning of *Antitrust*: Laws that prohibit anti-competitive behavior and unfair business practices, such as fixing prices or carving up markets among competitors. The laws prohibit certain practices deemed to hurt businesses or consumers, or otherwise violate standards of ethical behavior.

Competitor Relationship FAQs:

What should I do if a competitor approaches me at a trade show or in a casual environment and starts talking business?

You should try to guide the conversation back to a neutral topic. If that doesn't work, you should politely remove yourself from the situation. If in the course of the conversation the competitor discusses business practices, please consult Legal and Compliance.

A friend from my former employer handed me a list of accounts he agreed not to "poach" from me. Can I do the same for him, if I just give him a list of accounts I'm not interested in anyway?

No, you may not give a list of accounts to anyone outside the Company. Even if the former employer is not in direct competition with Hitachi Vantara, competition laws still apply. Just the appearance of impropriety may subject the Company and individual employees to liability. If someone offers you such a list, tries to fix prices, or suggests dividing markets, customers or territories, you should report this to Legal and Compliance immediately.

Someone sent me a copy of our largest competitor's confidential price sheet. This will be very helpful to us as we determine our pricing for next year. Can I use this information?

No. If the information is confidential, it cannot be used. Doing so is unethical and it could expose you and the Company to risk under competition laws. You should immediately contact Legal and Compliance, so that the information can be destroyed or returned to its owner.

Can I pretend to be a customer to get pricing information from our competitors?

No. Obtaining information about a competitor by misrepresenting your identity or by inducing an employee of the competitor or a third party to divulge confidential information is not acceptable. Gathering information about our competitors is only a legitimate business activity when done lawfully and ethically.

C. Relationships with Suppliers

Hitachi Vantara believes that our commercial interests are best served and our reputation protected, when we select our suppliers solely after a fair analysis of their products, services, prices and business practices. All suppliers, both current and potential, must have confidence in our selection process. In return, they are required to adhere to the Partner Code of Ethics and Business Conduct.

Supplier Relationship FAQs:

We buy a lot of product from Company X and we've given them a lot of advice on how to design their next generation product. They've asked me to be on their advisory board. It would be great for Hitachi Vantara and also good exposure for me. Can I serve on the advisory board?

Maybe, but first check with your manager and Legal and Compliance. You may not be compensated for your service and you must take care that your service does not conflict with the business of Hitachi Vantara or your particular job obligations. In addition, you will need to comply with the requirements of the Board Membership Policy.

A representative of a potential supplier has told me that if we award the contract to them, I will be eligible for a cash payment under their "Corporate Customer Reward Scheme." How should I respond?

The representative has just tried to bribe you, so you should promptly contact Legal and Compliance.

A supplier offered me a percentage of the supplier's margin, if I would encourage a major customer to purchase the supplier's services and products. Can I accept such a payment?

No. This is a kickback, which is prohibited by the Code and the Anti-Bribery/Anti-Corruption Policy.

D. Information Owned by Others

Hitachi Vantara recognizes that other companies are entitled to retain control of their internal information, so you must strictly observe all known limitations on the acquisition, use, copying and distribution of third party information or materials. Additionally, you should at the very least assume that markings such as "Confidential", "Proprietary", "Restricted Distribution" and "Internal Use Only" mean that the materials should not be used or distributed without prior written authorization from their owner. Even when materials aren't specifically marked, if you have any reason to believe that they may be confidential, you must treat them as such or take steps to clarify that they are not in fact confidential.

Third Party Information FAQs:

A friend of mine, who is a bit of a “mad scientist” and very creative, wrote down on a paper napkin an algorithm that he thought might improve data analytics. He had to leave dinner early and left the napkin on the table, so I picked it up. As I looked at it the next day, I realized that he might have come up with a really smart solution. What should I do with it?

If you are offered or acquire confidential documents or information of third parties (or become aware that another employee has solicited or possesses protected information), you must promptly notify Legal and Compliance.

E. Fraud

Hitachi Vantara does not tolerate **Fraud** and encourages all employees to be alert to any irregularities that might indicate Fraud.

Meaning of *Fraud*: The intentional misrepresentation or concealment of a material fact, for the purpose of inducing another person or entity to act upon it to their detriment. Examples of Fraud include: false expense reports; forged or altered checks; misappropriated or misused company assets; unauthorized handling or reporting of transactions; or inflated sales numbers.

Fraud FAQs:

A customer forgot to sign one page of a document when they returned their contract. They clearly meant to sign it. Can't I just “fill in the blank” for them?

No. The customer must sign every page of the contract where indicated, in order to ensure that they understand and most importantly agree to its terms. If the customer does not sign and a Hitachi Vantara employee “fills in the blank”, this constitutes forgery and could subject you and Hitachi Vantara to liability.

I want to join a professional organization, but my supervisor told me that the Company won't pay the dues. I really think the organization will help me in my job, so I plan to pay the dues myself and submit an expense report for something else to recover my money. Is this okay?

Submitting a false expense report is wrong, no matter what the circumstances. You need to decide if the personal benefits of joining the organization warrant paying the dues yourself without reimbursement from the Company.

I was asked to prepare false records to hide a situation that is not in compliance with our stated policies. I am not comfortable with this. What should I do?

Never prepare false records. As quickly as possible, bring the situation to the attention of your manager, or contact Legal and Compliance. Falsifying company records is never acceptable and could result in legal action against the Company and you personally.

I was at a customer dinner arranged and hosted by my manager. When the bill came, he handed it to me to pay it. To avoid embarrassment in front of the customer, I did so without commenting, but it didn't seem right. Shouldn't my manager have paid the bill?

Yes, Hitachi Vantara requires that the most senior Company employee at any event be responsible for settling all charges associated with the event.

Can two or more employees split a customer meal check, in order to keep the value of each expense claim below the limit allowed for a meal?

No, this would be an attempt to get around the meal value limits set out in the Third-Party Gifts, Travel and Entertainment Policy and would be a violation of that Policy.

F. Compliance with Anti-Bribery and Anti-Corruption Laws

Hitachi Vantara complies with anti-corruption laws wherever it does business and prohibits any use of a **Bribe**. In particular, the Company scrutinizes its partners as well as gifts, travel and entertainment, whether given or received by Hitachi Vantara employees, as these components of our operations are open to abuse and are known risk areas.

You must avoid engaging in any behavior that constitutes or appears to constitute a Bribe. You must take particular care when dealing with governments and **Public Officials** to avoid violations of anti-corruption laws, which are complex and impact many aspects of our business. Non-compliance may lead to fines and prison terms for you and for Company officials, as well as the loss of export privileges for Hitachi Vantara.

Hitachi Vantara can also be held responsible for the activities of its partners, including misconduct committed in the course of a transaction. Do not ask a Hitachi Vantara partner to engage in any behavior that constitutes or appears to constitute a Bribe. If you become aware of any such activity, or have any questions or concerns about the conduct of a Hitachi Vantara partner, you should promptly report it to Legal and Compliance or the Hitachi Vantara ethics hotline.

*Meaning of **Bribe**:* Anything of value that is offered, promised or given to anyone, directly or indirectly, with the intent to obtain or retain business, or otherwise to gain an improper advantage.

*Meaning of **Public Officials**:*

- Officers or employees of a government, government-owned enterprise, agency or regulatory authority
- Political candidates or political party members
- Public Officials representing a commercial enterprise
- Officials or employees of a public international organization (for example, United Nations, International Olympic Committee, World Bank)
- Immediate family of Public Officials
- Active/reserve members of police and armed forces
- Educational and medical employees of state-owned entities, including professors and doctors
- State-controlled media representatives and journalists
- Members of ruling or royal families

Anti-Bribery/Anti-Corruption FAQs:

Does Hitachi Vantara allow facilitation or grease payments?

Hitachi Vantara does not allow facilitation or “grease” payments to be made, even if they are legal or culturally acceptable in some countries. They may in rare instances be permitted, when there is an immediate threat to personal safety, security or freedom. However, you must promptly report such payments to Legal and Compliance and record them accurately.

What is the difference between a kickback and a Bribe?

A kickback is similar to a Bribe, but usually occurs after the fact. For example, if a supplier pays a percentage of its sales to an employee of a company, in return for the employee's assistance in steering that company's business to the supplier, that is a kickback. Bribes and kickbacks of any kind are against Hitachi Vantara policy.

Can Gifts, Travel and Entertainment be considered bribery?

Yes. This is a major area of enforcement focus and there is growing pushback against cash or cash-equivalent gifts in particular, even in countries in which they were previously an integral part of the culture. You will be required to take the online training course on this topic.

One of my employees asked me to approve a donation to a charity run by his customer's daughter. The customer didn't ask him to do this, but he knew that if Hitachi Vantara made this donation, it would influence the customer to award the business to us. I rejected the request. Are we in the clear?

A crime is not just committed when a bribe is given to someone; anti-corruption laws also prohibit requesting or offering a bribe, even if it is for a third party who is not part of the business transaction and even if the bribe is not in fact given. This proposed donation would very likely be scrutinized closely for any hint of bribery or other unethical behavior.

G. Export Laws

Hitachi Vantara knows that exporting is a privilege, not a right, and that loss of export privileges would severely impact our business. Through the Global Trade Compliance Department (“GTCD”), we comply with all export laws and regulations everywhere we operate. Be aware that they cover not only physical shipments but also the following:

- Transfers of technology via Internet
- Development and delivery of applications
- E-business and e-services
- Travel outside your country of employment with Hitachi Vantara products or technology
- Technical specifications and performance requirements given to suppliers for procurement from foreign sources
- Use of your personal knowledge (for example, technical assistance) abroad
- Release of technology, source code or downloadable software in the U.S. to anyone who is not a U.S. citizen or lawful U.S. permanent resident (also known as a “deemed export”)

Export FAQs:

Which countries are embargoed and/or sanctioned for Hitachi Vantara’s export shipments?

You will find the list of countries that are currently embargoed or sanctioned at:

https://connect.HitachiVantara.com/en_us/user/our-team/global-trade-compliance/export-compliance.html

In order to expedite the delivery of products and technical drawings to a non-U.S. customer, I propose to have employees traveling to our customer's facility hand-carry these products and drawings. Would this be a problem?

Yes. This could violate U.S. export laws and Company policy and cause delays, seizure of the products and drawings, fines, and loss of export privileges. Contact GTCD before considering any export or deemed export of Hitachi Vantara products, services, technology, technical data or information.

H. Anti-Boycott

Hitachi Vantara is prohibited from complying with or supporting one country’s **Boycott** of another country, when that Boycott is not sanctioned by the United States. You must therefore report promptly to GTCD or Legal and Compliance any request to support a Boycott or to supply information concerning a Boycott of any country.

Meaning of *Boycott*: Abstaining or agreeing to abstain from reporting business dealings with, or doing business with, a blacklisted person, organization or country, or agreeing to provide information about a person's race, religion or national origin in the context of such business dealings.

Anti-Boycott FAQs:

I've received a contract amendment stating that products may not be shipped using El Al Israel Airlines. Is this a problem?

Yes. U.S. law prohibits Hitachi Vantara, its subsidiaries, its affiliates and their agents from complying with or supporting a foreign country's boycott of a country that is friendly to the United States. El Al is owned by the state of Israel, a country that is friendly to the United States. This proposed amendment to the contract would constitute an illegal boycott request.

I want to send some products to a country on the anti-boycott list. Is it OK if I arrange to transfer them to a company in a country without these restrictions, which will then sell them to the country on the anti-boycott list?

It depends. As is true with many laws, what might seem like a "clever" way around the law may also be illegal. You should direct all requests with a potential anti-boycott component to GTCD.

We've received an order from a country that has imposed an economic boycott on another country. The potential customer's purchase order contains a statement to the effect that the supplier agrees not to procure materials from any blacklisted firm. May we accept the order?

No. Accepting this order would subject Hitachi Vantara to penalties, as it would be a violation of anti-boycott provisions of U.S. law. You should report the request to Legal and Compliance.

I. Accounting and Financial Reporting Laws

Hitachi Vantara follows strict accounting principles and places a high value on the integrity and accuracy of our record-keeping. As a result, you must report financial information, including expense reports, accurately and completely and use appropriate internal controls and processes to ensure that accounting and financial reporting comply with the law in every country in which Hitachi Vantara does business.

Record-Keeping FAQs:

After moving to a new group, I learned that money spent on entertainment is recorded as business advertising or market survey expenses. Since the amount spent is booked accurately, is there a problem if the category isn't correct?

Yes, it could be a serious problem. Various laws require that books, records and accounts accurately reflect the transactions of the Company. Slush funds, off-book accounts, falsified transactions and misrepresentations of expenses violate the Code and the law.

I ordered some software and my supervisor is asking me to record the charge against another expense category because our budget for software has been exceeded. What should I do?

No-one should knowingly make an incorrect entry in the Company's books and records. If your supervisor persists, contact his or her manager, or contact one of Hitachi Vantara's confidential reporting tools for actual or suspected violations:

Call 1-877-437-ETHX (3849) in the U.S. or Canada

International phone numbers are listed at:

<https://www.Hitachi Vantara.com/en-us/contact/compliance-reporting-phone-numbers.html>

Or you may report online at:

<https://www.reportlineweb.com/Welcome.aspx?Client=Hitachi>

NOTE: In either case, you may give your name or remain anonymous.

COMPANY ASSETS

A. Tangible and Intangible Assets

All reasonable care must be taken to ensure the integrity and security of Hitachi Vantara's business assets, both tangible (physical property, equipment and documents) and intangible (information, intellectual property and goodwill). In particular, all internal information and documents are confidential, unless they are specifically intended for distribution or release outside Hitachi Vantara, and they should not be shared with anyone - even a co-worker - who does not have a need to know. If you leave Hitachi Vantara, you must still follow these rules concerning our confidential information.

You are also required to comply with policies, guidance or instructions issued by the Chief Information Officer, the Chief Information Security Officer, or authorized members of the IT Department ("IT"), with respect to the

preservation of the confidentiality, integrity and availability of information, such as how to avoid data breaches, phishing schemes or hacks. If you learn of any theft, misuse, wrongful disclosure or other risk to Hitachi Vantara assets, promptly notify your manager, IT or Legal and Compliance.

Company Asset FAQs:

I like using a popular, free program on my smartphone. Can I also download it onto my Company laptop?

No. Only software that Hitachi Vantara has licensed and provided to you for business use should be loaded on Company-provided computers. You must not download so-called “freeware” or “shareware” programs or files, which can be a source of computer viruses.

B. Intellectual Property

Intellectual Property designed or conceived while you are employed by or under contract to Hitachi Vantara belongs to the Company. You are required to disclose all Intellectual Property to Hitachi Vantara and protect it like any other Company asset.

*Meaning of **Intellectual Property**:* Proprietary information including trademarks, trade secrets, copyright, know-how, ideas, techniques, inventions (whether patentable or not), computer programs, technical innovations, system design, or technical enhancements.

Intellectual Property FAQs:

I'm not sure if the information I have is a Hitachi Vantara trade secret, so who can I ask?

A trade secret is virtually any business information that is valuable to Hitachi Vantara, whether technical or non-technical, because it is not generally known by our competitors or any other outsiders.

If you are unsure what constitutes a trade secret, you can consult the Trade Secret Policy, or consult Legal and Compliance.

DATA PROTECTION

Hitachi Vantara complies with laws concerning **Data Protection** in all countries in which it does business and takes particular care when transmitting **Personal Information** across international borders. You must confirm that proper authorization has been obtained, before you collect, store, use, process, transmit or disclose any Personal Information of your colleagues at Hitachi Vantara, or of employees of our sales prospects, customers, suppliers or strategic partners.

Meaning of *Data Protection*: The process of safeguarding the privacy of Personal Information and other data, in order to comply with laws and regulations that control their collection, storage, use, processing, transmission and disclosure.

Meaning of *Personal Information*: Any information by which a person can be individually identified, including information relating to employment, compensation, medical records and benefits.

Data Protection FAQs:

I received an email from my manager containing the home address and phone number of a new member of our department, who is located in another country. What should I do?

You should check with your manager whether there is a business need for you to have this personal information. If so, you should ensure that you only use it for that business purpose. If not, determine with your manager how best to dispose of the information securely.

One of your team informs you that he has a health issue that will require him to be out of work for three months. This is sensitive information, so can you tell your manager and HR?

Because it involves a prolonged absence from work that will impact your team's activities, you can tell your manager and HR in a private meeting, even though the information is confidential.

Am I allowed to send personal data about Hitachi Vantara employees to a third party, such as a consulting firm that is under contract to Hitachi Vantara?

Maybe, but you should first ensure that you have followed all legal requirements, particularly if any of the data concerns Hitachi Vantara employees located in Europe. You should contact Legal and Compliance for prior approval.

CONFLICTS OF INTEREST

A. Divided Loyalties

You must avoid situations in which there is a potential for conflict between your personal interests and your obligations to Hitachi Vantara. You may not evade these requirements by acting indirectly through anyone else, such as your spouse, in-laws, children, friends or relatives. If in doubt, you should always seek prior guidance and approval from your manager, HR or Legal and Compliance.

Examples include:

- Marketing on a **Commercial Basis** products or services that compete with current or potential offerings from Hitachi Vantara or other Hitachi, Ltd. companies.
- Representing, working for, or serving on the board of a customer or competitor of, or supplier to, Hitachi Vantara while in the Company's employment
- Investing in any organization with which Hitachi Vantara does business or competes, if that investment would create, or appear to create, a conflict of interest with Hitachi Vantara.

*Meaning of **Commercial Basis**: Any business activity from which a person receives payment or any benefit in kind, whether directly or indirectly.*

Divided Loyalty FAQs:

I am working another job to get extra cash on the side. Is this ok?

Maybe. This will depend on the nature of the other job and whether it adversely affects the way you perform your duties at Hitachi Vantara. You should consult with your manager or Legal and Compliance, to ensure that there is no actual or perceived conflict of interest.

I've been asked to be on the board of directors of another company. May I serve?

Perhaps. Because Hitachi Vantara is always expanding into new business areas, there is no firm line regarding acceptable activities. If asked to sit on a board, you should consult your manager and Legal and Compliance and comply with any resulting restrictions. You will also be required to adhere to the Board Membership Policy.

As a Hitachi Vantara employee, however, you may not represent, work for, or serve on the board of, a customer, reseller or distributor of, or supplier to Hitachi Vantara.

B. Company Time and Assets

You may not perform non-Company work or solicit non-Company business on Hitachi Vantara's premises during work hours, or by using our assets, including email, internet, equipment, materials, resources or confidential information.

Company Time and Asset FAQs:

I check my personal email at work and use the printer for non-work purposes. Is this allowed?

While you may occasionally check your personal email, and print for non-work purposes, this practice is discouraged if it interferes with your work or the work of others.

I have a side business for which I need to create advertisements and my work computer would be great for that. May I do that?

No. You may not use Hitachi Vantara equipment for your own business.

C. Inside Information and Insider Trading

You must not use **Inside Information** for your own benefit, financial or otherwise, nor engage in **Insider Trading**.

*Meaning of **Inside Information**:* Any type of non-public information that could affect the market price of a company's securities (shares, options, etc.), or influence a reasonable investor to buy, sell or hold stock or securities.

*Meaning of **Insider Trading**:* The purchase or sale of, or other dealings in or with, a company's stock, shares or other securities, on the basis of unauthorized disclosure of non-public information.

Insider Information and Insider Trading FAQs:

If we're not a public company, why do I need to know about insider trading?

Although Hitachi Vantara is not a public company, Hitachi, Ltd. is publicly traded. If you receive any potentially sensitive information about Hitachi, Ltd. or any other publicly-traded company as a result of your employment at Hitachi Vantara, the Insider Trading Policy of Hitachi Vantara applies to any trading in the securities of that company.

D. Public Service

Hitachi Vantara supports responsible participation in the civic life of local communities, such as serving on a board or committee. However, employees must abstain from voting on or participating in any decision that involves a relationship between that entity and Hitachi Vantara, in order to avoid any actual or apparent conflict of interest.

Public Service FAQs:

I am on a school board that is voting on an issue that affects Hitachi Vantara? What should I do?

In such circumstances, you should make it clear that you are a Hitachi Vantara employee and you need to abstain from voting on or participating in the decision. If there is a continuing conflict of interest, you should resign from the board.

E. Political Contributions

You must not, in the name of Hitachi Vantara or on our behalf, make any financial contributions or provide other support to political parties, politicians, or candidates for election to public office, without prior approval from Legal and Compliance.

Political Contributions FAQs:

My sister-in-law is a candidate in a local election and I want to support her campaign. May I do that?

Yes, provided that you do so in your private capacity. In particular, you may not state or otherwise create the impression that Hitachi Vantara in any way supports your sister-in-law's candidacy.