



 **TEALIUM®** | **Code of Ethics & Business Conduct**

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Our Cultural Values

Respect

Respect begins with the Golden Rule – treat others the way you want to be treated. Listen carefully, speak kindly, be patient and tolerant of all points of view, and don't be judgmental. Body language counts. Mutual respect is the foundation of our values and collective culture.

Empathy

Be highly committed to cooperation in the workplace. Being empathic begins with respect. Be understanding and try to identify with your colleagues' thoughts and feelings whether you agree with them or not.

Innovation

Innovation is not just about patents and technology inventions. It is about change and creating something new and useful, developing a better process, an idea that makes life and work better, or more fun.

Diversity

Be respectful of and appreciate differences in ethnicity, gender, age, physical abilities, sexual preferences, experience, knowledge, and culture. Be inclusive.

Accountability

Take responsibility for your words, actions, and duties. Do what you say you will do. Have radical self-reliance.

Getting Things Done

It is not about a to-do list, but a commitment to priorities and a drive to make an impact and a difference.

Passion

Enjoy the challenges of life and be proud of the work you do. Bring energy, enthusiasm, and good cheer to those around you and be firm in the belief that what you do matters and is valued.

Transparency

Say what you are going to do and why you are going to do it. Be accountable, honest, and authentic. Do and say things with pure motives.

Introduction

Why do we have a Code?

This Code of Ethics and Business Conduct (the “Code”) outlines our commitment to promoting a responsible and ethical work environment for all employees, directors, and executive management of Tealium Inc. and its subsidiaries (collectively, “Tealium”).

This Code contains guidelines concerning proper behavior throughout the world while working. The Code applies to all Tealium employees (including executive officers) and members of the Tealium Board of Directors, as well as consultants and agents doing business on behalf of Tealium. As used in the Code, the Executive Officers include the Chief Executive Officer, Chief Financial Officer, and Chief Legal Officer. For the purposes of the Code, references to employees include all of the aforementioned.



Guiding Principles

This Code is built on all of Tealium's values, but in particular those of accountability and transparency. Each employee is responsible for following and exercising good judgment consistent with the Code. When making decisions and exercising your judgment, consider:

1. Can I justify this to my manager?
2. Will my actions reflect positively on the company as a whole?
3. Are my actions respectful?
4. Do I doubt whether my actions are legal?
5. Would I be comfortable if my actions were made public?
6. Is this the right thing to do?

If your answer to any of the above questions is "no," you must stop and reevaluate.

Responsibilities

In performing your duties for Tealium, you are responsible for abiding by all Tealium policies and all local and national laws in all countries in which Tealium does business or, if you are working remotely, in the country (or countries) where you work. You are expected to become familiar with and understand the requirements of this Code and all Tealium policies. You are also

obligated to know and comply with all other applicable laws, rules and regulations of any regulatory organization, licensing agency, or professional association governing your professional activities. Tealium expects you to speak up if you are aware of any suspected or actual violations of the Code.

Third parties

Consultants, representatives, independent contractors, external temporary workers must observe the same standards of conduct as Tealium employees when conducting business with or for Tealium. We expect our resellers and suppliers to have substantially similar standards of conduct as those contained in this code. No employee may indirectly or through agents do anything the employee is prohibited from doing under Tealium's policies. Business integrity is a key standard for the selection and retention of those who represent Tealium.

Our Customers and Vendors

We Demonstrate Accountability

One of Tealium's core values is accountability, and we are proud of running our business with integrity. Tealium demonstrates its commitment to this core value by avoiding conflicts of interest, being careful with gifts, meals, and entertainment, and entering into trustworthy and transparent business relationships.

We avoid conflicts of interest

All business decisions should be made solely in the best interests of Tealium, not for personal benefit. Therefore, you should avoid any actions that create, or appear to create, conflicts of interest with Tealium.

A "conflict of interest" may occur when an individual's own interests (including the interest of a family member or an organization with which an individual has a significant relationship) interfere, or appear to interfere with the interests of Tealium. Remember, conflicts of interest, whether real or perceived, can be very damaging to Tealium's reputation.

It is important that you recognize when a situation can be, or be perceived as a conflict of interest. Examples of conflicts of interest are:

- Accepting employment or consulting with a Tealium competitor
- Accepting any other role, including employment, that would impair or compromise the performance of your obligations to Tealium

- Agreeing to speak at an event with a significant honorarium
- Starting your own business that competes with Tealium
- Hiring a family member, either as an employee or vendor
- Using information that you acquired while working at Tealium for your own gain

Many conflicts of interest or potential conflicts of interest can be resolved or avoided if they are appropriately disclosed and approved. In some instances, disclosure may not be sufficient and Tealium may require that you stop the conduct or take other appropriate action to reverse the action in question.

If you are concerned that a particular action or relationship may constitute a conflict of interest, please discuss your concern with your manager as soon as possible.

Doing business with spouses, relatives, friends, or your own business

Generally, it is not permissible to conduct business by leveraging personal or familial relationships to gain an advantage.



What does this mean? If your spouse, partner, relative, or friend works for a business with which Tealium has a relationship, and one or both of you can exercise discretion in connection with this relationship, you need to disclose the existence of a potential conflict of interest. Even if you keep all dealings above board, Tealium still needs to know of your connection to its business partner and decide whether someone else should manage that relationship to avoid even the appearance of wrongdoing.

Similarly, it is considered a conflict of interest for any director or executive officer to hold a 5% or greater interest in a major customer, vendor or lender to Tealium unless disclosed and approved by the board or appropriate committee of the board. This provision is not to be construed to limit or impair the investment activities of the employer or affiliate of any independent director.

Serving as director or officer for an outside company

All employees are expected to avoid any outside employment with, or investment in, companies that are in competition with

Tealium (other than immaterial or insignificant investments such as indirect investments through mutual funds or retirement accounts).

Approved outside business activities may not interfere with the employee's work for Tealium, and the employee may not use Tealium's name, equipment, facilities, or other resources for outside activities. Employees may be subject to additional restrictive covenants relating to outside business activities and competition with Tealium.

Opportunities related to Tealium's business

Employees may not accept opportunities related to the business of Tealium or opportunities that they discover through their positions with Tealium or through the use of Tealium property or information.

We are careful with gifts, meals, and entertainment

Tealium makes business decisions based on objective factors such as cost, quality, value, service, and the ability to carry through on commitments. We apply these factors when choosing and working with our external partners.

Tealium wants to avoid even the appearance of impropriety in making its business decisions. Therefore, Tealium employees should not give or receive anything of value when doing so may compromise or appear to compromise the objectivity of business decisions, such as cause the recipient to feel indebted to the giver.

You should never give a gift that:

- violates applicable laws or regulations;
- is or appears to be given in order to obtain an improper business advantage;
- is or appears to be given to influence someone to do something inappropriate; and/or
- would be considered extravagant or improper under the circumstances.

We understand that it is often customary for business partners to exchange gifts of modest value, or to share a meal or other forms of entertainment. Certain activities of this nature are permitted as described below.

Some examples of gifts and entertainment that are allowed are:

- One-time gifts with an established value of \$150 or less.
- Business-related meals of reasonable value.

- Reasonable, business-related attendance of sporting or other entertainment events or education-related events in the company of the customer or vendor.
- Gift baskets or flowers of nominal value.
- Promotional items of nominal value such as those bearing a vendor's logo.
- Samples of (or coupons for) a vendor's products may be accepted. However, it is not appropriate for employees to receive for their personal use multiple coupons or samples of the same product from a vendor and any samples or coupons must be of modest value.

If someone attempts to give you a prohibited gift, such as a gift card with a value over \$150, you should politely decline and report it to your manager for appropriate action.

Please be exceedingly careful when giving gifts to government officials, as there are stringent laws that govern such gift-giving. Violation of these laws can result in significant consequences and penalties for you and for Tealium.

Question

In the past two months, Sheri's established customer has taken her to several dinners, sent her a fancy bouquet of flowers, and provided her with a number of samples of the customer's product. Has Sheri violated the Code by accepting these gifts?

Answer

Although each of these gifts is permissible under the Code on an individual basis, when considered together, they may create an appearance of impropriety. After the first gift or two, Sheri should have consulted her

manager or other appropriate resource before accepting further gifts from her customer. Always err on the side of caution and ask yourself, is this good for the company?

Which of the following gifts violates the Code?

- (A)** A customer taking George to a dinner at a five-star restaurant, which included several bottles of wine that cost more than \$100 each.
- (B)** Courtside tickets from a customer, an NBA franchise, to a basketball game for Malik and his two kids.
- (C)** A complimentary monthly wine subscription given to Shannon from a vendor.
- (D)** A \$200 gift basket sent by Tealium to a potential new customer, with an accompanying flyer that provided useful information regarding Tealium products.

Answer

All of these gifts violate the Code. **(A)** violates the Code because the cost of the meal and the wine were extravagant and may give the appearance of impropriety (i.e. that the customer was using the dinner to influence George in some way). Even if it's uncomfortable, it's important that employees adhere to the Code's requirements. **(B)** violates the Code because the tickets were only for Malik and his children; the customer did not attend the game with them. Additionally,

the cost of courtside seats was likely significant. **(C)** violates the code because employees should not receive multiple samples of the same product. **(D)** violates the Code because the gift's value is more than nominal and is intended to improperly influence the customer into purchasing Tealium's services. However, a gift such as this may be permissible if part of a specific campaign and approved in advance.

We enter into trustworthy and transparent business relationships

We could not be successful without the valued partnership of our customers, vendors, and other business partners. We expect Tealium employees to prioritize integrity as follows:

- **Be honest.** Anything you say to a partner should be accurate. We do not want to win deals by being misleading, deceptive, or untruthful; we want to win deals because we have accurately represented Tealium's products and services.
- **Be fair.** When interacting with a partner, avoid even the appearance of impropriety. No one should take unfair advantage of another through manipulation, concealment, abuse of confidential information, falsification, misrepresentation of material facts or any other practice involving intention unfair dealing.
- **Seek accountability.** We must always perform due diligence in evaluating a possible partner, because we seek to build relationships with other businesses that share Tealium's values.
- **Be ethical.** Choose business partners carefully and objectively.

We follow the law

Tealium prides itself on running its business well within the boundaries set by applicable laws and regulations. Tealium expects all of its employees to be aware of, and maintain

compliance with, the legal framework that applies to them and their business activities.

Fair competition

Tealium conducts its business as a vigorous, but ethical, competitor: maintaining total compliance with antitrust laws and holding employees in management positions accountable. Both the company that is convicted of an antitrust offense and the individual employees involved in the antitrust activity may be subject to severe criminal and/or civil penalties.

Violations of antitrust laws generally arise as a result of "agreements" or "understandings" among competitors, which may arise as a result of contact or communication among competitors. Therefore, Tealium employees must be extremely sensitive to communications between employees of competitors and themselves. Extreme care must be used to ensure that communications with competitors are kept to a minimum and do not form the basis for any misinterpretation or for inferences regarding illegal and unethical business practices.

No employee shall enter into any understanding or agreement, whether express or implied, formal or informal, written or oral, with a competitor limiting or restricting any of the following aspects of the competitive strategy of either party or of the business offering of either party to any third party or parties: prices, costs, profits, product or service offerings, terms or conditions of sale, production or sales volume, production facilities or capacity, market share, decisions to quote or not to quote, customer or supplier classification or selection, sales territories, and distribution methods.

Your coworker, Scott, let you know that he recently reached an “informal” agreement with a competitor, under which Scott will only pursue new customer relationships in the western part of his territory, and the competitor will only pursue new customer relationships in the eastern part of his territory. Scott is very excited about this agreement, because he thinks it will help him meet his quota. Is this agreement acceptable?

No, this agreement is not acceptable and likely violates applicable antitrust laws. You should never divide territories, markets, or customers with a competitor.

What about trade unions?

Membership in a trade association can be very beneficial to a company, but any gathering of competitors should be strictly scrutinized due to potential antitrust issues. Any employee who attends a trade association meeting must observe Tealium’s Rules for Trade Association Meetings in the Employee Handbook.

What about standard development and product certification activities?

Employees should also be aware that participation in standard development and product certification activities, which impact competitors or suppliers, may raise antitrust concerns. Before participating in committees or organizations, which develop standards or certify products, employees should consult with the legal department.

Bribes and improper payments

Making bribes, kickbacks or other improper payments to government officials, civil servants, or anyone else to influence them is prohibited. Anti-bribery and anti-corruption laws including, without limitation, the Foreign Corrupt Practices Act (FCPA) and the Bribery Act 2010, throughout the world make it illegal for anyone at Tealium to offer, promise, or pay money or anything of value, directly or indirectly, to any government official or employee, political party, or candidate for public office for the purpose of obtaining or maintaining business or for any other business advantage.

The fact that bribery may be an accepted local practice in a country does not relieve Tealium employees from complying with any applicable anti-bribery or anti-corruption laws. This includes “facilitation” or “grease” payments, which are payments made to government officials to expedite

government actions, such as installing services, delivering documents, or processing applications. Even if the amount is small, facilitation or grease payments are prohibited.

Warning signs:

- **“I know a way to speed this process up.”**
- **“You do not need approval for this payment.”**
- **“This is how things are done in this country.”**

Privacy and data protection

Tealium is committed to respecting the privacy rights of our customers and our employees. It is the responsibility of every employee to respect the privacy of our customers and fellow employees. Access to and the use of employee and customer information is limited to only that which is required to perform your job. Employee and customer information should not be used for personal benefit or for the benefit of others. Our Acceptable Use Policy can be found here.

Insider trading

In the course of work at Tealium, employees may become aware of material non-public information about Tealium or other companies (such as Tealium customers or vendors) that is not available to the public. “Material” information includes any information that would influence a reasonable investor to buy or sell stock or to buy or sell the stock of Tealium or a company with a current or prospective business relationship with Tealium.

Although the securities of Tealium are not yet publicly traded, the securities of many of our customers and vendors are publicly traded. The use of material, non-public information by employees for their own financial benefit or that of a spouse, relative or friend is against Tealium policy and against the law.

It is a serious violation of securities laws to buy or sell securities of a company to which the information applies while in possession of material, non-public information. It is also illegal to give the information to others who can reasonably be expected to use the information to trade any stock. The law imposes severe criminal and civil penalties and fines for individuals who violate this law.

Trade compliance

Tealium complies with all applicable export and import control laws and regulations. We require employees to perform due diligence when evaluating potential partners to ensure that we do not violate export control regulations.

In addition, Tealium complies with United States anti-boycott laws. This applies to Tealium everywhere we do business, in all parts of the world. United States anti-boycott law is intended to prevent Tealium from taking any action in support of a boycott imposed by one country unless that boycott is also approved by the United States. Tealium is required to report the receipt of any request to participate in an international boycott.

Money laundering, financial crime, and anti-terrorism

Tealium complies with all applicable laws and regulations related to financial crimes, money laundering, and terrorist financing. Money laundering occurs when funds derived from criminal activity is processed to make them seem legitimate. As always, be vigilant and report any suspicious financial transactions to the Tealium whistleblower platform.

Political contributions

Employees of Tealium are, of course, permitted to participate in legal political activities on their own time. However, Tealium does not permit the use of corporate funds for political

contributions, regardless of their size, to or on behalf of any political party, candidate, or cause. The term “contributions” includes the free use of company facilities, property or personnel, advertisements on behalf of candidates, purchase of tickets to political dinners, etc.

The only exception to this restriction would be in connection with the legitimate lobbying efforts of a trade association of which Tealium is a member, subject to the advance approval of the legal department.



We protect confidential information

Trust is a core value of Tealium. Our employees, customers and partners trust us to keep their confidential and non-public information safe. We are committed to using any confidential information we collect for legitimate business purposes only and to protect such information from unauthorized access, use, loss, or disclosure. Employees should access only the limited information needed to perform their jobs and share

the information with colleagues within Tealium on a need-to-know basis only. Information should never be shared with any unauthorized person outside of Tealium. Where confidential information includes personally identifiable information, applicable laws and regulations require a higher standard of care. The confidentiality agreements signed by each Tealium employee require all employees to maintain the confidentiality of sensitive information entrusted to Tealium by its customers, vendors, and other third parties.

Justifications to avoid

<p>You're being too sensitive!</p>	<p>Listen to yourself – if something is bothering you, there is probably a good reason for it.</p>
<p>Nobody will know!</p>	<p>Tealium expects its employees to act with the utmost integrity, whether behind closed doors or in public. Also, the idea that “nobody will know” is seldom accurate in reality.</p>
<p>You must do whatever it takes to close a deal!</p>	<p>This is inaccurate. Although Tealium believes in vigorous competition, all employees must put ethics first and walk away from deals if the only way to close them is to engage in misconduct.</p>
<p>All of our competitors do this!</p>	<p>What other businesses do is their responsibility. At Tealium, our responsibility is adhering to the letter of this Code. We count on everyone to keep Tealium a strong, productive, and ethical company!</p>

Our Company

We protect our assets

Tealium's computing and information resources are corporate assets with strategic value. Tealium maintains robust security controls to prevent the unauthorized use, disclosure, modification, or destruction of non-public information, the disruption of Tealium's services and the theft or loss of Tealium assets.

Tealium employees must ensure that the use of Tealium computing and information assets, including the use of the Internet, electronic mail, and other on-line resources, and the use of computer hardware and software is consistent with the business objectives of Tealium. For additional information on this subject, please consult Tealium's [Acceptable Use Policy](#), the [Employee Handbook](#), and related policies.

Tealium prioritizes the protection of proprietary, personal, and other confidential information ("Confidential Information"). Confidential Information includes Tealium information not known to the public that may have intrinsic value or that may provide Tealium with a competitive advantage.

Examples of Tealium Confidential Information:

- Sales forecasts
- Business, product, or marketing plans
- Intellectual property, including computer programs, software, and inventions or developments (regardless of the stage of development)

- Customer lists and customer information
- Legally privileged communication and materials
- Restructuring or reorganization plans
- Financial information
- Business practices

Employees must not use or disclose any Confidential Information that they produce or obtain during employment with Tealium, except to the extent such use or disclosure is required by their jobs. This obligation remains even after an employee's employment with Tealium ends.

This section of the Code supplements, but does not replace, employees' obligations of confidentiality, non-disclosure, and intellectual property protection that are contained in the Employee Handbook and the confidentiality agreement signed by each employee when joining Tealium. Also, employees must follow Tealium's [Handling Confidential Information Policy](#) at all times.

We keep accurate records

Tealium's record keeping, organization, and reporting must be handled with the utmost integrity - accurate, honest, and complete. Inaccurate record keeping and reporting are always prohibited and may violate applicable laws and regulations.

Examples of inaccurate records include:

- Listing a fabricated expense on an expense account report or petty cash record
- Misreporting time worked
- False claims on our employee benefit plan
- Inaccurately dating a contract

As the end of the quarter approaches, Maria realizes she has already hit her quota. Maria closes a few more deals, but does not update Salesforce or date the contracts until the next quarter begins so these additional deals factor into her quota for that quarter. Maria believes this is okay because Tealium will receive the revenue either way. Is this a violation of the Code?

Yes, postdating contracts and failing to timely enter records into Salesforce is a violation of the Code. Employees must accurately and honestly record all transactions.

We prioritize safety

Tealium is committed to providing a clean, safe, and healthy work environment in every office location and to being an environmentally responsible corporate citizen. Tealium complies with all applicable safety, health and environmental laws and regulations and ensures the safety and well-being of all employees.

Safety is a shared responsibility of Tealium, managers, and employees. Everyone is responsible for genuine cooperation

with all aspects of safety, for continuously practicing safety in the performance of their duties, and for reporting any potential unsafe, unhealthy or hazardous conditions.

Employees working remotely are primarily responsible for maintaining a safe work environment that is free from hazards. However, in non-emergency situations, employees are encouraged to reach out to their managers if they feel their workspace is unsafe. In emergency situations, employees should always immediately seek assistance from the local authorities.

We communicate responsibly

We maintain policies and procedures to help guide employees about communicating responsibly. All external communications must be cleared with the marketing department.

Examples of external communications include:

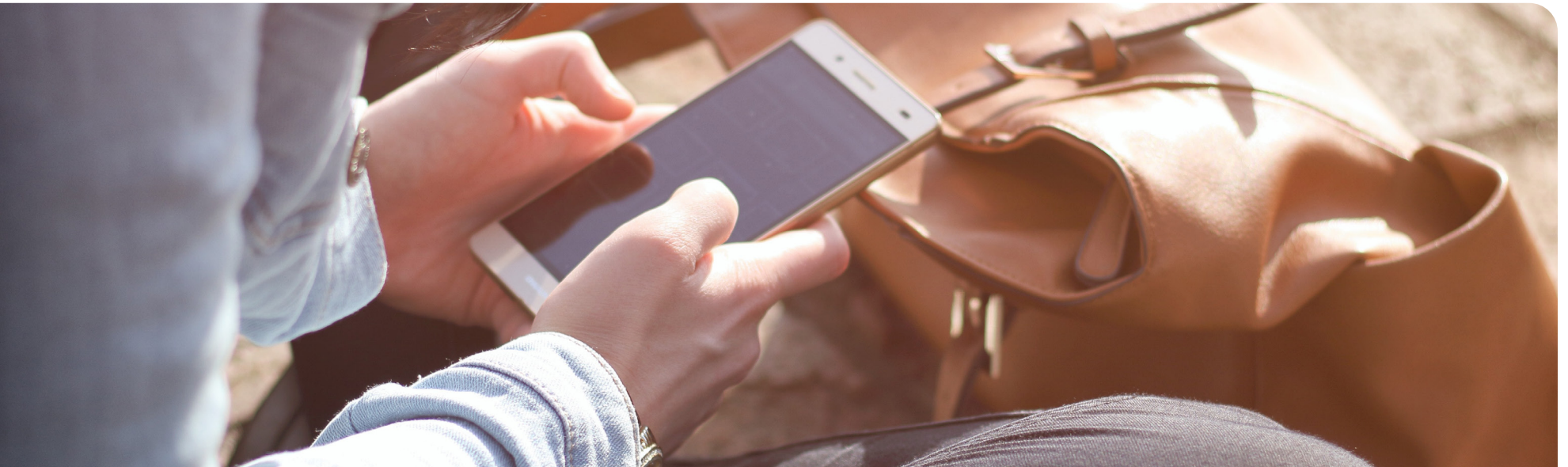
- News releases
- Case studies
- Advertising
- Blog postings, internet message board or chat room postings
- Conversations with journalists, bloggers, industry or financial analysts.

In addition, all media inquiries, verbal or written, must be directed to the Chief Marketing Officer, who will evaluate the request and answer or direct it as appropriate.

Media releases that include quotes by employees, or speaking/webinar engagements where the individual will be recognized as an employee of Tealium must first be approved by the Chief Marketing Officer or other Executive Officer.

Social media

We expect all Tealium employees to exercise good judgment when using social media, including Internet chat rooms, blogs, email communications, or similar forums (“Social Media”). You should never disclose any Tealium Confidential Information when posting to Social Media. To the extent you discuss Tealium while using Social Media, you must identify that you are a Tealium employee and that all views are your own. Tealium employees are prohibited from posting anything to Social Media that may constitute a threat, intimidation, harassment, or bullying.



Our Communities

We treat people respectfully

Tealium is an equal opportunity employer and values diversity in all facets of its business operations. Tealium believes that diversity and inclusion are key components to growth, and aims to recruit and employ the best qualified individuals without regard to race, color, sex, religion, national origin, disability, age, sexual orientation, and/or any other protected characteristic as established by applicable laws and regulations. This applies to all stages of an employee's relationship with Tealium, including recruiting, hiring, compensation, benefits, promotions, training, opportunities for training, transfers, and terminations.

Tealium does not tolerate discrimination of any kind and endeavors to be anti-racist in its policies and procedures.

Tealium does not tolerate harassment of our employees, by anyone, including any manager, co-worker, vendor, customer, contractor, or any other third party.

If you see something, say something. If you experience or witness harassment, please reach out to the human resources department or the legal department. You may also report harassment to the Tealium whistleblower platform.

If you are unsure if something you experienced or witnessed was harassment, or if you want more information



regarding how to report harassment, please contact the human resources department or the legal department.

It is Tealium's policy to investigate all harassment complaints thoroughly and promptly. To the fullest extent practicable, the confidentiality of those involved will be maintained. If an investigation confirms that harassment has occurred, corrective action will be taken. Corrective action may include discipline up to and including termination of employment. Tealium forbids retaliation and intimidation against anyone who has reported harassment or who has cooperated in making a report, provided the report was made in good faith and with a reasonable belief that the report was true.

We protect human rights

Tealium believes in treating all people, whether or not employees of Tealium, with dignity and respect. The United Nations Guiding Principles on Business and Human Rights informs how Tealium treats others in the course of its business.

Tealium expects its employees and vendors to refrain from causing or contributing to violations of human rights as part of their business activities. This includes complying with applicable employment and labor laws, respecting anti-slavery, human trafficking, and anti-child labor laws, and maintaining reasonable work hours, benefits, and wages.

How do I support the protection of human rights while working?

Consider the impact your work and behavior have on other people. Be careful when entering into relationships with vendors and other partners. If you think your work may create or contribute to a human rights violations, please seek guidance.

We believe in environmental responsibility

Tealium promotes the responsible use of resources and follows all applicable environmental laws and regulations. We encourage employees to minimize waste and consider eco-friendly alternatives to traditionally resource-heavy activities.

We encourage employees to let our vendors and other partners know that sustainability is a priority at Tealium, and encourage them to follow suit.

We practice corporate responsibility

Tealium is proud to be an active member of its community and supports various internal and external initiatives for social change. Tealium is involved in the local educational community and encourages young women to pursue careers in the STEM field. Tealium motivates its employees to volunteer by offering paid time off for volunteer activities and runs a global internal program, "Tealium Cares," that promotes volunteerism. Tealium organizes donations for sectors of its community that are in need. Tealium is also very supportive of its senior employees serving as mentors, both to internal Tealium employees and others in the community.

RBA Code of Conduct

To the extent applicable to Tealium's business operations, Tealium supports and expresses its intent to comply with the standards for labor, health, safety, the environment, and business ethics expressed in the Responsible Business Alliance (RBA) Code of Conduct and maintain a system for managing compliance with such standards. A copy of the RBA Code of Conduct can be found here:

https://www.responsiblebusiness.org/media/docs/RBACodeofConduct6.0_English.pdf

One Last Data Point

By following this Code and honoring our core values, not only are you doing the right thing, but you are actively making Tealium a stronger company. Strive to set the ethical standard as high as you can in your work and others will follow your example. We are grateful for all of your efforts and to have you on team Tealium.

Resources

Exceptions

We do not expect there to be a case where an exception to this Code would be necessary, however, Tealium will review requests for exception. A business case for non-compliance must be presented to the Chief Legal Officer and the request for exception approved in advance through a risk acceptance process, including escalation to the Board of Directors where necessary.

Reporting ethics and compliance concerns

Do not try to investigate any suspected violation of the Code on your own. Instead, you should report all suspected or actual violations of the Code.

It's always okay to ask for help. Tealium provides you with a mechanism to confidentially and anonymously report concerns about compliance with this Code. Please report any concerns to the Tealium Whistleblower Platform using the contact information below.

Tealium will never take any action against you for reporting suspected misconduct in good faith.

The Tealium Whistleblower Platform is operated by OneTrust, an independent third-party provider, and the person answering your call is a professional trained to receive information in confidence and to relay concerns to the appropriate people for handling.

Phone number: (800) 461-9330

Online form submission: <https://app.convercent.com/en-us/Anonymous/IssueIntake/LandingPage/f9b9cb98-d56f-ec11-a989-000d3ab9f062>

On a recent call, one of your coworkers knew several details regarding a customer's personal life. You suspect that your coworker and the customer may possibly be friends or relatives. Should you:

- (A) Ask your coworker if he is related to or friends with the customer, and remind him of his obligations under the Code.
- (B) Discuss the matter with your other colleagues, seek additional information regarding your coworker's personal and familial relationships, and then tell your manager what you heard on the call and what you gathered from others.
- (C) Immediately report your suspicion to your manager, and let management address your concerns.
- (D) Keep your suspicion to yourself because you are not sure if any violation of the Code has occurred and you do not want to get in trouble.

Answer

(C) You should not investigate any potential or actual violations of the Code on your own. Please report any potential or actual violations to your manager, the legal department, the human resources department, or by calling the Hotline. Remember, Tealium will not take any adverse action against you if you make a good faith, reasonable report of suspected wrongdoing.

Consequences

Violating the Code or other Tealium policies may result in corrective action, up to and including termination of employment and Tealium may seek to recover damages or file criminal charges. In addition to imposing its own discipline, Tealium may bring any violations of law to the attention of

appropriate law enforcement personnel. Most problems can be easily avoided by simply using good judgment and seeking guidance when questions arise. It is your responsibility to raise questions, make appropriate disclosures, and bring potential problems to Tealium's attention.