



# **Avanade Code of Business Ethics**

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## **I. Introduction**

### **Our Core Values**

Avanade is grounded in a set of core values that we embrace and consistently strive to implement in our daily work.

- Act with integrity, dignity and respect
- Achieve through teamwork
- Focus on customers
- Connect globally
- Demonstrate a passion for technology
- Build the Avanade experience

These core values serve as a compass to guide our decision-making at a company and individual level. Together, we put these values into practice to build a deeply skilled, world-class, global company. Our ongoing commitment to these values is necessary to ensure that we will operate with the highest ethical standards and achieve our vision:

*To be recognized as a global services innovator, helping  
customers realize the best results from the Microsoft platform.*

The Avanade Code of Business Ethics describes and reinforces conduct that is based on our guiding core values, consistent with our policies and practices, and essential to Avanade's legal and regulatory compliance obligations. On the Avanade Policies website, the Code provides references to underlying Avanade policies, which offer detailed, up-to-date ethical, legal and policy guidance. The Code does not reference all Avanade policies, but highlights and reinforces key areas of ethical and legal conduct, which are central to our business activities and essential to us as representatives of Avanade.

The Code of Business Ethics applies to all Avanade officers and employees. It also applies, as appropriate, to members of our Board of Directors, and to others, including individuals such as temporary support staff, third party contractors, and other service providers, when they act on behalf of Avanade.

Each of us has a duty to become familiar with the issues of ethical conduct and legal compliance covered here and to abide by these principles and our policies in all of our business relationships and activities. Any waiver of the Code for any member of the Executive Leadership Team or Board of Directors may be made only by the Board or a committee of the Board. Likewise, any amendment to the Code will be disclosed promptly in accordance with any applicable legal or listing requirements.

We share responsibility as Avanade people to apply the principles of our Code of Business Ethics in every decision we make affecting our people, our customers and Avanade. We also are each responsible for reporting violations and for protecting from retaliation those who report their concerns.

## **II. Customers and the Marketplace**

Avanade strives to create value for its customers. In so doing, it is essential that we conduct our business activities in a manner that is lawful and fair, with the highest level of integrity, to our employees, our customers, other stakeholders, and our communities.

## **Customer Value Creation**

Avanade commits to provide quality service to its customers. Avanade collaborates with its customers to shape opportunities that are value-driven. Avanade places its customers' interests first, and provides excellence in delivery.

## **Competition and Fair Dealing**

Avanade abides by all laws and regulations that promote fair and open competition among companies, including the U.S. anti-trust laws, the European Union competition laws, and similar national laws in other countries. In no case will Avanade engage in activity that has the effect of restraining competition, such as agreements to fix prices.

While Avanade people are encouraged to compete vigorously in the marketplace, each person must conduct our business affairs in a fair and lawful manner. Avanade and its employees must avoid all forms of deceptive conduct or unfair advantage through manipulation, concealment, misrepresentation of material fact or otherwise.

## **Treatment of Competitors**

Avanade will always compete aggressively, but will treat its competitors fairly. Avanade will market its services and solutions on their merits and will not disparage its competitors or provide misleading information about them.

While gathering information about Avanade's competitors is a legitimate business activity when done lawfully and ethically, it is never appropriate for Avanade people to obtain information about a competitor through improper means. Improper means can include

- misrepresenting one's identity,
- inducing an employee of the competitor to divulge confidential information, or
- gaining improper access to a competitor's confidential information, directly or through third parties.

## **Protection of Customer and Third-Party Information and Intellectual Property**

Avanade expects all its people to take appropriate measures to protect copyrighted or licensed information as well as any confidential or otherwise protected information of our customers and other third parties. This includes understanding and abiding by any applicable contractual restrictions Avanade has agreed to follow with its customers or other third parties.

We should not discuss, disclose, copy or otherwise use any copyrighted, licensed, or confidential customer or third-party information without proper authorization from the owner, and then only as authorized and required as part of our work with Avanade.

Avanade people may not use copyrighted, licensed, or confidential customer or third-party information for personal or other gain or advantage, or to advance the interests of Avanade, except where specifically authorized by Avanade and the affected customer or third party. It is the responsibility of each of us to take appropriate precautions to make sure unauthorized people do not have access to or use such information. In addition, our people should not use third-party copyrighted, patented, or otherwise protected materials without proper authority. Any third-party software used must be properly licensed.

## **Government Contracting**

Almost every country and governmental entity with which Avanade conducts business has laws and regulations setting forth procedures and requirements for contracting with it.

Government customers can include partially state-owned enterprises that otherwise appear to be independent commercial organizations; however, they may carry risks and liabilities like other governmental customers.

Avanade is committed to complying with all applicable government contracting laws and regulations. All Avanade people who serve government customers are responsible for understanding the legal requirements and restrictions that apply to such work.

## **Accurate Invoicing**

Avanade people responsible for creating customer and other third-party invoices must use utmost care to prepare accurate invoices. Each and every invoice Avanade issues should be based upon accurate and complete information and should be in compliance with the underlying contractual arrangements.

## **Gifts and Hospitality**

Avanade people must maintain the highest standards of integrity and objectivity in dealing with customers and vendors. Gifts or hospitality given or received must be of nominal value and in compliance with applicable law, the giver's and receiver's policies on the matter, and local business custom and practice. Generally, Avanade discourages providing gifts to public officials or inviting them to attend Avanade-sponsored events. Avanade people should exercise additional diligence by referring to Policy 1221 Contact with Public Officials for additional checklists and guidance.

Entertainment and meals offered or received as part of legitimate business activities are generally allowed, but must be within the boundaries of reason and moderation. Gifts of cash or cash equivalents to or from any current, former or potential customer or vendor are not permitted. Cash equivalents include checks, money orders, stocks and securities. Generally, raffles and prizes that are part of a business activity are not considered gifts, but approval must first be obtained from the Office of Ethics and Compliance. All gifts and hospitality offered by Avanade people must be recorded in accordance with Avanade's expense and reporting policies.

Although Avanade does not prohibit gift giving among employees, it is important to use reason and good judgment when giving or accepting a gift. In most cases, gifts should be of a nominal value, and people should only be asked to contribute to a gift voluntarily. A gift should never be given to another employee to influence or show favoritism.

Avanade-approved items provided to its employees as recognition for a business achievement or part of a sponsored event are allowed, but are subject to all applicable tax requirements. If a question arises, one should always disclose the situation and consult with others. Questions concerning the permissibility of gifts should be referred to the local Avanade Legal Group representative or the Office of Ethics and Compliance.

## **III. Professional Conduct**

Avanade people will conduct themselves professionally in the workplace and appropriately in their work-related activities. Professional conduct is an integral part of Avanade's image and business impact globally.

## **Meritocracy**

All Avanade people have the right to be treated equitably and to work in an environment that is free from unlawful or unfair discrimination.

To achieve this goal, Avanade people must support and promote the principles of meritocracy. Career decisions must be driven by an individual's talents, skills, and abilities, in addition to Avanade's business need.

Avanade is committed to preserving and enhancing diversity within the organization.

## **Anti-Harassment**

Harassment in any form is unethical and can expose Avanade to legal liability if based on sex, race, religion, color, age, non-disqualifying physical or mental disability, national origin, sexual orientation, or any other category protected by law.

Harassment can take the form of verbal comments, physical touching or other inappropriate conduct, and will not be tolerated. It could seriously undermine the integrity of Avanade's professional environment as one in which each person can grow and succeed as much as possible. Avanade people have the right to work in an environment that is free from harassment and to report inappropriate behavior without fear of retaliation.

## **Personal Relationships**

It is inappropriate for our people to have a personal relationship beyond friendship with those who are subject to their supervision, with whom they have a reporting relationship, or with any outside party with whom they have dealings as a representative of Avanade (including customers, contractors, alliance partners and vendors).

## **Conflicts of Interest and Corporate Opportunities**

Avanade people must avoid situations where they could potentially act in a way that is not in the best interest of Avanade and should endeavor to avoid even the appearance of a conflict of interest.

Avanade people should never use their position, knowledge of Avanade, or Avanade contacts for their own personal gain. Avanade employees are responsible for ensuring that their personal interests, investments and activities (including those of family members) do not conflict with

- their objectivity or independent judgment,
- Avanade's best interests, or
- any of Avanade's relationships with its customers or vendors.

Avanade people are not permitted to make decisions for, or recommendations to, Avanade concerning third parties in which employees have any direct or indirect financial or other interest without full disclosure, as such an interest creates a potential for bias.

Third parties include customers, alliance partners, venture portfolio companies, vendors and others. In any situation where there is a potential for bias, the decision maker should disclose the conflict of interest to an appropriate member of the management team.

Avanade people may not take opportunities for themselves that are discovered or created through the use of Avanade's property, information, relationships or position, or use them for their own personal gain.

All of us have a duty to advance the legitimate interests of Avanade in an ethical way when the opportunity to do so arises. It is not possible to identify all situations that could create a conflict of interest or the appearance of one, and Avanade places primary reliance on the good judgment and integrity of its people. If you are unsure whether a situation creates a conflict of interest (or even the appearance of one) you should contact the Office of Ethics and Compliance. It is always better to come forward before taking action than to have to explain your decision after the fact.

### **Maintaining a Safe Workplace**

Violent conduct or threats of violent conduct in the workplace are never appropriate and will not be tolerated.

Anyone who, while doing work for Avanade, engages in such actions or threats in the workplace, brings weapons or harmful or threatening materials into the workplace; or otherwise engages in such conduct outside the workplace while performing work on behalf of Avanade, will be subject to appropriate disciplinary action, which may include termination.

Avanade endeavors to avoid unsafe working conditions that could affect Avanade people, regardless of who owns the worksite. Any unsafe condition should be immediately reported to a supervisor or to the appropriate local Avanade security official. For the safety and health of Avanade's employees and others, employees and their customers and guests who are present at Avanade facilities are required to be familiar with and follow all safety and emergency procedures posted or adopted by Avanade, including Avanade's crisis management policy. Avanade people must also be familiar with and follow the safety and emergency procedures applicable to them at customer sites.

### **Prior Employment Obligations**

Avanade respects the continuing obligations that new and prospective Avanade people may owe to a prior employer, including restrictions on use or disclosure of confidential information.

Avanade expects its people to uphold their valid and enforceable obligations to their prior employers, such as restrictions on confidential and proprietary information or soliciting customers or employees of their former employer, and to notify Avanade immediately if they believe any job activity may conflict with such obligations.

Avanade requires that all incoming employees resolve any impediments to their employment with Avanade before accepting an offer of employment with Avanade.

### **Data Privacy**

Avanade is committed to respecting and protecting the legitimate interests of its people and of third parties in the privacy of their personal data.

Many countries in which Avanade operates have specific laws and regulations dealing with the treatment of personal data. The European Union, in particular, has enacted very complex and detailed data privacy laws. All Avanade people are expected to follow these laws and regulations, as well as Avanade's Data Privacy Policy.

## **Internet, E-mail, and Voice Communications**

Avanade people must exercise good judgment and act in a professional manner when using Avanade resources. This includes Avanade e-mail, Internet access, and access to other external electronic systems using Avanade resources.

This expectation also extends to activities on customer systems or with customer-provided access.

All communications relating to Avanade business or using Avanade's information technology resources are company property and must conform to Avanade's policies for acceptable use of the Internet, e-mail, voice communications, and similar electronic media systems.

Our people may not use Avanade or customer information technology resources to take or to damage the intellectual property rights of third parties, including through any Internet peer-to-peer, file-sharing, or other downloading services.

## **Personal Activities**

Avanade people are urged not to participate in outside activities that have a negative impact on the performance of their job, conflict with their obligations to Avanade, or otherwise reflect adversely upon Avanade's business, image or reputation.

Because we do not want to damage Avanade's business, image, or reputation, we conduct our personal activities, which include our personal financial and tax affairs, in the same way that we conduct our business activities – with the utmost integrity.

## **IV. Protection of Avanade Assets**

Avanade people are expected to use the highest level of care to safeguard, protect, and enhance Avanade's assets, and to use them only for legitimate business purposes.

Avanade's assets include the following:

- real and personal property;
- intangible assets, such as the Avanade brand, intellectual property, and reputation; and
- our employees.

## **Avanade Name and Brand**

Avanade's name and brand identity are powerful and valuable assets that differentiate us from our competitors. Our name and brand identity represent us in the global market, and we reflect that market by having a global attitude. Our words and actions support and advance Avanade's name, brand identity, brand positioning, and our personality as a company. We must treat Avanade's name and brand in all activities and transactions in a globally consistent manner.

No third party has the right to use our name or brand without our prior written approval, and that approval must be granted in accordance with our naming and branding policies. If a third party asks you about using Avanade's name or brand, check the relevant policies or contact our Sales and Marketing group.

## **Avanade Intellectual Property**

Avanade people are expected to help develop and protect Avanade's intellectual property. Avanade endeavors to protect its intellectual property rights to the greatest extent permissible. Avanade seeks appropriate protection of its intellectual property rights in contracts and under copyright and patent laws. All work product created by Avanade people in the course of their employment should be the exclusive property of Avanade, and our people are expected to help identify and secure protection for these innovations.

## **Avanade Confidential and Proprietary Information**

Avanade people have a responsibility to protect Avanade's confidential and proprietary information from disclosure and improper use. Avanade's confidential and proprietary information includes the information of its parent companies, Accenture and Microsoft, and of its customers.

Avanade people must take all necessary measures to prevent unauthorized disclosure of confidential information, including strictly adhering to Avanade's information security policies, communication policies, and agreements governing proper use and disclosure.

Avanade people may only disclose confidential and proprietary information if they have proper authority to do so, and even then only to those with a legitimate business need to know it. Disclosure for a legal reason can only be made with the approval and assistance of the Avanade Legal Group.

Confidential and proprietary information includes any information or material not generally available to the public that is generated, collected or used

- by Avanade and that relates to Avanade's business, research, development activities, customers, or employees, or
- by an Avanade customer and that relates to the customer's business, research, development activities, its customers, or its people.

Avanade people must never use confidential Avanade or customer information for their own personal gain or advantage.

Certain obligations with respect to Avanade's confidential and proprietary information continue to apply even after association with Avanade ends.

## **Avanade Financial Information**

Avanade is committed to full, fair, accurate, timely, and understandable disclosure in reports and documents submitted to regulatory bodies and its stockholders and in other public communications.

Avanade people should not share Avanade's financial information with any third party unless

- the information has already been publicly reported, or
- a request has been sent to, and approved by, the office of the Chief Financial Officer.

## **Avanade Computer Hardware and Electronic Device Protection**

Avanade people are responsible for keeping their assigned computer equipment and other electronic devices within their control and exercising appropriate safety precautions when their equipment is unattended. Equipment must be protected at all times from theft and use by unauthorized persons.

Certain security measures are detailed in Avanade policies, including the User Security Policy, and further information is included on the ITS and the Client Data Protection pages of the Avanade Intranet.

## **Financial Integrity and Reporting**

Avanade is required to comply with Generally Accepted Accounting Principles (“GAAP”), and Avanade people are required to comply with internal accounting and auditing controls. We must maintain and present Avanade’s accounting and financial records, as well as reports produced from those records, in accordance with the laws of the applicable jurisdiction.

These records and reports must accurately and fairly reflect, in reasonable detail, Avanade’s assets, liabilities, revenues and expenses. All transactions must be recorded accurately using the proper charge number and in the proper accounting period, and must be supported by reasonably detailed and accurate documentation.

## **Time and Expense Reporting**

Avanade employees are responsible for submitting timely, accurate, and complete time and expense reports in accordance with Avanade policies and applicable country regulations, using the time and expense reporting tools designated for each country.

Because time and expense report forms are the foundation of business documents, such as customer invoices, any knowing misrepresentation on these documents will be considered unethical and will be investigated. Every employee is responsible for the accuracy of his or her own time and expense reports and submitting the required documentation, even if the reports are completed on their behalf by someone else.

In certain instances, time and expense reports must also comport with our customers’ policies. If this is the case, it is the consultant’s responsibility to be aware of and to comply with those policies.

## **Customer Engagements**

Avanade people must ensure appropriate approval and authorization are obtained when engaging customers or making commitments on behalf of Avanade. The approval process ensures that the

- appropriate people review proposals to commit the company,
- business engagement is valid,
- goods and services can be provided based upon the required specifications, and
- contract meets legal requirements and is otherwise compliant with our policies.

## **Purchasing and Payments**

Avanade people must ensure appropriate approval and authorization are obtained for purchasing commitments and invoice payments made by Avanade. The approval process ensures that the

- appropriate people review proposals for the company to spend money,
- business expense is valid,
- goods or services are received and meet the required specifications, and
- invoice meets legal requirements and is otherwise compliant with Avanade's procurement policies.

Avanade should purchase goods and services only on the merits of price, quality, performance, and suitability. No Avanade person may knowingly cause or direct the company to purchase goods or services of any kind, for itself or its customers, from vendors owned or controlled by Avanade people or their immediate family members.

Avanade will not enter into any improper or illegitimate transactions, any transactions that have even the appearance of impropriety or illegitimacy, or any transactions that are intended in any way to misrepresent the accounting records or financial reports of the parties to the transaction.

## **Archives and Records Management**

Avanade manages its archives and records to leverage its knowledge capital, maximize its intellectual property, and achieve its business objectives. Avanade will maintain, manage, store, and dispose of its archives and records in compliance with its contractual obligations and applicable legal and regulatory requirements, such as tax or data privacy laws.

Certain company records, such as tax materials or documents required in legal proceedings, may be retained for extended periods. If you receive a notice from the Avanade Legal Group to preserve certain records (a "Hold Notice"), you must comply strictly and preserve all electronic and paper records described in the Hold Notice, including e-mails and drafts, until you receive further instructions from the Avanade Legal Group. Avanade prohibits the destruction or alteration of any materials relevant to such an investigation or litigation.

If you have notice that a government investigation, a dispute, or litigation involving Avanade has been threatened or initiated, you must immediately contact your direct supervisor and the Avanade Legal Group. Until you have legal guidance, you should not destroy or delete electronic or paper records related to the subject matter of the investigation, dispute or litigation.

## **V. Avanade as a Local and Global Citizen**

Every Avanade person must understand that Avanade is committed to being a good local and global citizen, as grounded in our core values.

### **Compliance with Laws**

Avanade takes very seriously its responsibility to operate as a good corporate citizen. Avanade and its people have a responsibility to comply with all applicable laws. If a local law conflicts with the Code, we

follow the law. If a local business practice conflicts with the Code, we follow the Code. When in doubt, ask for help.

### **Improper or Questionable Payments**

Avanade people will not make, promise to make, offer, or authorize any unlawful, improper, or questionable payments or commitments of company funds to

- customers or vendors,
- government officials, agencies, or employees,
- political parties or candidates, or
- any other entities or individuals anywhere in the world

for the purpose of obtaining or retaining business or securing any improper advantage, directly or indirectly.

Further, Avanade prohibits any undisclosed, unrecorded or falsely recorded transactions as well as any payments made for other than their stated purpose. It is simple: Avanade will not pay bribes or make improper payments to obtain new business, to retain existing business or to secure any improper advantage. And we will not use others to do things we cannot.

Accepted local business practices that ignore or even condone bribery are irrelevant. Bribery is illegal in every country where Avanade operates. Local requirements vary, but all Avanade people must adhere to the same high standard regardless of work location.

Remember, even if our competitors are doing it, Avanade's expectations are clear: we will not tolerate any violations of this policy.

In any case where our people may have questions about the propriety of a payment, gift or benefit, they must obtain advance approval from the Area President and the Avanade Legal Group, or otherwise follow Avanade's written policies.

### **Insider Trading**

Many countries have laws prohibiting the purchase or sale of a security on the basis of material information that is not publicly known, and that, if publicly known, would have affected the market price of the security.

Generally speaking, information is considered material if a reasonable investor would likely consider it important in deciding whether to buy or sell the security and it could affect the price of the security.

Avanade people possessing such material information about a security may not buy or sell the security (whether it be Avanade, Accenture, or Microsoft securities or the securities of a customer or third party) or provide that material information to others, until such time as the information becomes public.

## **Immigration**

Avanade complies with the immigration laws of the locations in which its people are working. Everyone Avanade hires must have current, valid authorization to work in the country of their employment. When working outside their home country, Avanade people must obtain all required visas and work permits before they arrive in the host location.

## **Export Control Laws and Boycotts**

Avanade complies with applicable export control and anti-boycott laws and regulations in the countries within which Avanade operates.

Export control laws may restrict the export or re-export of goods, software and technology that originate in a country in which Avanade operates. Export law may also restrict shipments of certain foreign-made products incorporating Avanade technology and software, as well as transfers of controlled technology to certain foreign nationals, whether in the local country or abroad.

Avanade also complies with applicable anti-boycott laws and regulations. These laws may prohibit Avanade from entering into contracts or agreements to

- refuse to do business with certain countries or companies,
- provide information about its business relations with certain countries or companies, or
- discriminate against, or provide information about, individuals or companies on the basis of race, religion, gender, national origin, nationality, or any other classification prohibited by law.

In some cases, Avanade may be required to report requests to participate in any of the above to the government.

## **Sanctions and Embargoes**

Avanade will comply with applicable laws and regulations related to sanctions and embargoes imposed by countries within which Avanade operates.

Various governments have programs of economic and trade sanctions against certain countries, terrorists, terrorism-sponsoring organizations, entities involved in the proliferation of weapons of mass destruction, and international narcotics traffickers. In some cases, even an indirect facilitation of a transaction is prohibited.

## **The Environment**

Avanade is committed to the protection of the environment and will comply with all applicable environmental laws and regulations of the countries in which it conducts business.

## **Political and Charitable Contributions and Activities**

The law in many countries sets strict limits on contributions by corporations and government contractors to political parties and candidates, and violators are subject to very serious penalties. Because of the complexity, variability, and severity of laws governing corporate political activities, Avanade, its people and agents will not engage in any corporate political activities without first obtaining written consent from the Avanade Legal Group and, in all cases, only for proper and legal purposes.

Avanade people remain free to make political contributions in their personal capacity as they deem appropriate. Avanade will not reimburse such expenditures.

Cash or in-kind contributions to political candidates and organizations using Avanade resources are prohibited.

Avanade does not endorse political activities that any person undertakes as a private individual. Use of the Avanade name or brand to endorse a political activity or event is not permitted.

Avanade supports community involvement by its people as private individuals. Use of the Avanade name to endorse a charitable organization or event is not permitted without prior approval by an appropriate member of the management team.

## **VI. Our Responsibility**

As employees of Avanade, we acknowledge that violating the Code of Business Ethics, including our obligation to report violations or to cooperate in any investigation of suspected violations, breaks our trust with Avanade and our customers and opens us to individual disciplinary action, including termination, and perhaps to legal liability. All Avanade people are expected to become familiar with the Code and Avanade's policies and must comply with them at all times. Nothing in the Code constitutes a contract of employment with any Avanade person.

Each of us is responsible for being watchful and for reporting any violations or suspected violations of these principles, either through normal reporting relationships to any member of management, or through the Avanade Business Ethics Line described in the next section. All Avanade people must speak up or take action if they are aware of any potentially unlawful, unethical, or fraudulent activity, including any concerns about questionable accounting or auditing matters, or any other similar activity that causes concern.

Each of us certifies our compliance with this Code when we file our time reports. We may also be asked periodically to certify our compliance with the Code or specific policies regarding other employment duties.

The Code shall apply to

- Avanade employees,
- members of Avanade's Board of Directors, and
- temporary support staff, third-party contractors, and service providers when they act on behalf of Avanade.

Avanade may periodically ask any of the above to certify their compliance with the Code or various specific policies.

## **VII. Where to Go for Help**

In the event that you have questions about the Avanade Code of Business Ethics, any Avanade policy, or whether past or contemplated conduct may present ethical or legal issues, you may avail yourself of the following resources:

- depending on the circumstances, you may want to discuss the issue with a direct manager, a Human Resources representative, or a member of the Avanade Legal Group;
- you may send questions to the Office of Ethics and Compliance at [ethics@avanade.com](mailto:ethics@avanade.com); or
- you may visit the Avanade Company Policies page of the Avanade Intranet for a convenient, single-source gateway to information about the Code, company policies, and Avanade's Vision, Mission and Values.

The Avanade Business Ethics Line should be used to report specific concerns regarding Avanade's financial affairs, accounting practices, auditing matters, corruption or fraud. It also should be used in serious cases where a vital interest of the company or the moral or physical well-being of our people is at stake.

If you want to report any other matter, please use your usual reporting channels including your direct manager, your Human Resources representative, or a member of the Avanade Legal Group.

When using the Avanade Business Ethics Line, you are not required to identify yourself. However, if you choose to remain anonymous, Avanade's ability to investigate the matter may be impaired (as we will not be able to contact you directly).

If you choose to identify yourself, your identity will be treated confidentially to the extent allowed by law and shared only with a limited number of people who have a need to know or who are responsible for dealing with reports and investigations. Your personal information will be held and used in accordance with Avanade's Data Privacy Policy and data privacy law.

### **Reporting Responsibility**

All Avanade people are responsible for reporting any violations of the Code of Business Ethics.

Employees who come forward with concerns play an important role in maintaining our ethical workplace and high performance business, as well as in protecting our shareholder value.

Avanade will not tolerate retaliation against any employee because that person raised a concern or used the Avanade Business Ethics Line (or any other appropriate channel) to report an ethical or legal issue in good faith.

### **Telephone Reporting**

The Avanade Business Ethics Line is a service operated by an outside agency, on our behalf, to receive and pass on reports to an appropriate Avanade person for investigation and follow up. Reports can be made on an anonymous basis, if desired. A local phone number has been established for each country where Avanade has offices. A listing of those phone numbers can be found [here](#).

### **Web Reporting**

The Avanade Business Ethics Line is also available via an encrypted website hosted by a specialist third-party service provider. You can choose from two versions (depending on whether you are located in an E.U. or non-E.U. country).

- For countries inside the European Union, use (<https://www.financial-integrity.com/avanadebusinesseuline.jsp>).

- For all other countries, including the U.S. and Canada, use (<https://www.integrity-helpline.com/avanade.jsp>).

The Ethics and Compliance Program Intranet site has the most up-to-date information, including information about toll-free phone lines and web reporting access.

### **Audit Committee Reporting**

In addition to the Business Ethics Line telephone and web reporting, employees may direct concerns about certain matters to the Audit Committee Chairperson by e-mailing the concern to [ethics@avanade.com](mailto:ethics@avanade.com). Concerns involving the following categories can be sent to the Audit Committee Chairperson:

- Financial affairs;
- Accounting practices;
- Auditing matters; or
- Potential corruption or fraud.

### **The Office of Ethics and Compliance**

If you find yourself facing a situation where the decision does not feel “right” and no Code principle or Avanade policy seems to address the situation or you need more guidance or information, please contact the Office of Ethics and Compliance at [ethics@avanade.com](mailto:ethics@avanade.com).

In addition, please bookmark the links referenced below so you will always have them available if the need arises.

- The Ethics and Compliance Program Intranet page offers a convenient, single-source gateway to information about the Avanade Ethics and Compliance Program: <https://workspace.avanade.com/sites/Legal/ethics/default.aspx>
- Policies and related documents can be found at the Avanade Company Policies page: <https://go.avanade.com/intranet/policies/>
- Contact information for the Avanade Business Ethics Line is located at: <https://workspace.avanade.com/sites/Legal/ethics/Shared%20Documents/Business%20Ethics%20Line.aspx?PageView=Shared>
- Questions about Avanade’s policies may be sent to [policies@avanade.com](mailto:policies@avanade.com).