Code of conduct

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Introduction

ThoughtWorks is a community of passionate individuals whose purpose is to create an extraordinary impact on the world through our culture and technology excellence. Five different lenses give us clear perspectives for how we can all contribute to achieving our purpose. Our culture is present in everything we do, so our values form the outer layer, wrapping it all together:

This diagram shows who we are, why we exist and what brings us together, and it guides us in every-thing we do. It informs every decision we make, and this Code of Conduct is the tool we use to pilot our behavior while striving to fulfill our vision.

Our Code of Conduct and policies do not (and cannot) cover all possible scenarios and should be understood to communicate general principles and expectations of you to:

- demonstrate respect for your colleagues, our clients and everyone else we interact with;
- carry out your work responsibilities with integrity and in an honest, professional manner;
- obey the laws of the jurisdiction where you are working.

How to use the Code of Conduct

The Code is organized to expand outward from each of us as individuals and set clear expectations for the behaviors we expect in all work related interactions, whether within Thoughtworks, with our clients or with others outside Thoughtworks. It addresses how we treat each other, how we act as an organization and how we behave in the context of society. Our global and regional policies provide supporting details on specific topics addressed within this Code of Conduct. Everyone is expected to read, understand and follow the referenced policies.

This Code of Conduct contains links to related policies that will help guide your decision making and provides information on how to report violations. If you come across a situation that you feel is not addressed by the Code, please provide feedback to compliance@thoughtworks.com.

This Code will be reviewed annually or when prompted by certain events or changes in our business.

How we treat each other

Treat all others equally and with respect
We come to work as ourselves. We enjoy each other's company. We encourage and support each other through active listening and constructive feedback. We value honesty and transparency. Ideas and doing the right thing are more important than appearances and backgrounds.
We abhor and reject discrimination and inequality and promote diversity in all its forms. We proudly, passionately and actively strive to make both Thoughtworks and our industry more reflective and inclusive of the society that we serve. We do not tolerate harassment of any kind, including sexual harassment or any form of intimidation, physical or verbal threats and other unwanted or unwelcome actions, including demeaning statements about an individual.

Be professional even when it gets personal
You may work with family members, or really good friends, and sometimes relationships at work may become romantic. Regardless of the level of personal relationship that exists between you and someone you work with, stay professional and do the following:

- Ensure there's no conflict of interest stemming from the relationship.
- Remain unbiased and do not allow the relationship to affect your professional conduct and sound decision making.
- Recuse yourself from critical decisions related to the other person, especially employment decisions like promotion & salary analysis, to avoid even the appearance of bias.
- Make sure it's reciprocated. Whether it's asking a friend to join you for after work activities or asking someone you are romantically interested in out for coffee, be sure the person you are asking can freely say "No" without fear of retaliation.
- Keep the balance of power in check - a person with less experience, or less authority, may feel they can not say "No" without suffering repercussions.
- If you pursue or develop a romantic relationship with someone you work with and you are in a position of power with respect to them (seniority, manager, etc), you assume a greater risk if the relationship doesn't go as planned or if allegations are raised related to harassment, lack of consent or other violation of our Anti-harassment policies.

Stay safe, healthy and alert
We strive to provide a safe working environment that supports your physical and mental health. When you feel your work may be adversely affected by your health, or substance use, seek help from your local People team. Also, keep the following in mind:

- Ensure that your use of substances (drugs, alcohol or other) does not impair your ability to do your work.
- Take breaks when needed to remain focused and alert.
- Use ergonomic equipment to support your physical well being.
- Respect safety standards of your office or client work location.
- Thoughtworkers are prohibited from bringing guns or weapons to Thoughtworks or any of our client sites, unless such restriction violates the law.

How we interact at an organizational level

This section of the Code speaks to our interactions as individuals within Thoughtworks as an organization, as well as our interactions as representatives of Thoughtworks with other organizations or groups.

Avoid Conflicts of Interest
Where your personal relationships or financial interests intersect with your job responsibilities, you run a heightened risk for conflict of interest. These are times when you should be intentional to carefully avoid having such conflicts erode the trust you've built with Thoughtworks and your colleagues, or negatively impact your or Thoughtworks reputation. To avoid conflicts of interest, you should always:

- Do the right thing; act with integrity and in the best interest of Thoughtworks and our clients.
- Disclose any potential conflicts of interest, even if it may feel minor, to your regional management or local legal counsel (e.g., you would like to participate as a volunteer board member of an organization not controlled by Thoughtworks - generally this is acceptable but we need to have a conversation in advance).
- Recuse yourself from decisions where a personal relationship or financial interest may influence your decisions (e.g., spouse or relation may receive a bonus for providing a service to Thoughtworks).
- Acknowledge that a conflict of interest may exist even if you don't think you're biased
- Adhere to our Anti-bribery and Anti-Corruption Policy and Outside Activities Policy.

Use Thoughtworks' property and facilities responsibly
Thoughtworks' assets and facilities are provided for Thoughtworks activities. We expect you to take care of Thoughtworks' property as if it is your own and avoid misuse and waste.

Build good client and supplier relations
Our business depends on good relationships with our clients and suppliers. We need to respect and observe our client's culture and policies when we are performing work for them. We also need to ensure that our suppliers respect our Code of Conduct in order to properly serve our needs and those of our clients.
However, in both instances, we would never ask that you compromise your safety or tolerate behavior that undermines our values or our Code of Conduct. If you feel there is a misalignment between a client's or supplier's culture, values or conduct with our standards, report it to your local People team, regional leadership or local legal counsel and be mindful of the following:

- Respect the privacy of all and preserve the confidentiality of business information obtained in the course of doing work for our clients.
- Be mindful of your surroundings. Do not discuss clients, suppliers or their individual employees by name in public locations in order to maintain confidentiality and respect privacy. Refer to Communicate correctly and appropriately with the public for more detail.
- When you get involved in a passionate, lively conversation, whether in writing or verbally, with anyone (because we know you will), make sure it remains professional and respectful. Avoid raised voices, profanity, or demeaning comments. Stick to logical, fact based discussions or excuse yourself from the immediate situation if you are unable to do so.
- Maintain a professional approach to relationships, observing other sections of this Code of Conduct and relevant policies (Anti Bribery, Conflict of Interest, Use of Privileged Information, Intellectual Property, etc.).

- Demonstrate respect for human rights and fair labor practices by ensuring all vendors and suppliers share our commitment to never use any form of forced labor.

Use and manage information responsibly

Classify, use and store information accordingly
Thoughtworks and the services we provide to our clients runs on information. We must manage that information in a manner that respects employee/personal privacy, confidentiality and numerous laws, regulations and client obligations related to protecting information from unauthorized exposure.
We have many policies that provide detailed guidance on how information is protected and managed at Thoughtworks. Everyone is responsible for understanding and following them in all activities that use Thoughtworks' systems or information.

Do not misuse or share privileged information
During the course of our work, we may receive information which is not public knowledge and which may offer unfair personal advantage in third party negotiations.

- Treat all information that is not publicly available with strict confidentiality.
- Be aware that access to privileged information may place you in a conflict of interest.

Respect intellectual property rights
Thoughtworks business depends on adequate respect for intellectual property (IP) rights. When Thoughtworks provides services to a client, ownership of the IP that results from our work usually passes to the client and is not ours or yours to copy, reuse or give to others. Exceptions to this general rule are addressed in our Outside Activities Policy.
We also must comply with vendor contracts, licensing terms and relevant local laws. In order to keep us compliant, please apply the following guidelines:

- When performing work for, or on behalf of, Thoughtworks, only use licensed assets or products procured through Thoughtworks or our clients. Failure to do so may result of breach of contract by Thoughtworks and costly penalties.
- Always check the terms and conditions of open source products to ensure legitimate and compliant use of the product.
- Do not copy, reuse, publicly post, or store IP assets (such as client or Thoughtworks' internal systems code) or proprietary information outside of officially designated repositories without first obtaining express approval from your local legal counsel.
- Observe all copyright conditions on materials at all times.

Communicate correctly and appropriately with the public
Thoughtworks strives for an open and transparent relationship with the press and general public, guided by ethical standards that reflect our values. We have marketing teams who ensure our culture, values and positions are accurately reflected to the public. We encourage you to spread our values and your knowledge related to our business through activities such as writing books, blogging, organizing events, speaking at conferences, and working on open source development in line with our values. The following principles apply:

- Ensure information you publish and control is accurate, maintains confidentiality and respects third party rights such as privacy and IP.
- Separate your personal opinions and persona from that of Thoughtworks. Do not create personas

or accounts that can be construed to represent Thoughtworks as an organisation.
- Speak on behalf of Thoughtworks only if that is your assigned responsibility and after you've received appropriate media training.
- Direct requests from external media representatives to your local Head of Marketing or Managing Director.
- Share official company posts supplied by our sales and marketing teams through your social community.
- Do not impersonate Thoughtworks or your colleagues or misrepresent your position, role or authority within Thoughtworks.

How we comply with our legal and financial obligations

This section of the Code describes Thoughtworks in the broader context of society, and how we work collectively to be an exemplary example of corporate behavior in the global community.

Prevent and fight corruption
Corruption is a crime and is treated as such by Thoughtworks. In the course of running our business we take action to eliminate corruption in all its forms. Never seek to influence government officials, business partners, advisors, or client decision makers by offering bribes, donating or promising to donate items of value, giving undue favors or making any threats.

Be responsible in giving and receiving gifts and hospitality
Providing and receiving small gifts and hospitality to, or from, our clients and suppliers can foster good will and is often considered a cultural courtesy. However, gifts, meals, events or trips that are extravagant or lack transparency can be considered bribes or may just be inappropriate. These rules should guide your behavior:

- Offer or accept gifts, hospitality, or travel, that are reasonable, appropriate, and have a legitimate business purpose. Check regional policies for applicable limits and approvals required. If you are still unsure, speak to your regional leader for guidance on responding to the offer.
- Never give or accept cash.
- Do not solicit gifts, hospitality or travel from third parties, or put them in a position where they feel obligated to provide something in order to do business with us.
- Don't receive gifts such as goods, hospitality, travel or accommodation from partners or suppliers that may be viewed as an incentive (or bribe) to do business with a particular third party.
- Be open and transparent on all gifts and hospitality provided to others or received.

Keep accurate accounting and financial records
Beyond simply respecting laws and regulations, we want our financial statements to be credible and reflective of Thoughtworks' operations. To prevent fraud, or the appearance of fraud, all financial and commercial transactions are to be transcribed clearly, correctly, completely and timely in company accounting records. This is true of all reports Thoughtworks presents to its clients, partners, government representatives and regulatory bodies, AND it is true of all reports you submit to Thoughtworks including your timesheets, expense reports, and similar.

Support aligned external entities
Thoughtworks may provide sponsorship, donations and contributions to organizations that support our mission and strategy. Requests and suggestions for any sponsorship, donation or contribution to any external entity will be reviewed by Managing Directors and Heads of Finance for appropriate alignment with our values and/or strategy, financial feasibility (prior to commitment) and legal compliance. All corporate sponsorships, donations or contributions (paid or in kind) will be evidenced by a signed agreement and properly reported on our financial statements.

Practice environmental safety and sustainability
We support and encourage Thoughtworkers, our clients, partners, vendors, suppliers and all other parties we interact with to generate an overall positive effect on the environment by adopting conscientious and sustainable practices that do not unnecessarily deplete natural resources or negatively impact ecological balance.
We are obligated to respect laws and regulations linked to the environment and the health and safety of people and do so, but we seek to go further than the letter of the law. Each of us must take responsibility in providing a safe and environmentally friendly workplace.

- Report anything you see that might present an unsafe physical or environmental situation or activity to your local People team.
- If you have suggestions for improvements to our physical work spaces, please direct them to your local People team or office manager.
- Help reduce Thoughtworks' environmental footprint by participating in voluntary programs and activities such as using public transportation or sharing rides when on business trips when practical, using electronic media over paper, using office recycling programs and avoiding excess packaging.

Speaking up

We want everyone to feel comfortable raising their voices when something doesn't feel right. In everything we do - and how we do things - we strive to role-model integrity, respect, trust and responsibility. All this is embodied in this Code of Conduct.

So if you observe actions that violate or appear to violate our Code of Conduct, our policies or the law, please speak up. This is the best way of demonstrating our integrity value: doing the right thing and doing things right. It helps to nurture our culture and maintain the diverse and inclusive workplace we actively strive to build.

Thoughtworks' leaders have greater responsibilities. If you are a leader, you are expected and required to speak up and report any such concerns. Thoughtworks also expects you to lead by example and create a transparent and open environment, in which concerns or suspicions can be raised without fear of retaliation. You are expected to escalate concerns when needed and support Thoughtworks' investigation process as well.

How to speak up?

Our culture is open and transparent, so the best first step is to address your concerns directly with the person involved if you feel comfortable doing so or if it is appropriate to do so.

If this isn't the case or if you're in doubt about what to do, you can raise any concern through any of these **Speak Up channels**:

- Your functional leader, client service team (CST) or any regional or country leaders
- Your regional Head of People or People Partner/Talent Business Partner
- Your regional legal team
- Global compliance team by email (compliance@thoughtworks.com)
- Thoughtworks' Chief Compliance Officer (CCO)

You can also use Thoughtworks' Integrity Helpline via integrity.thoughtworks.com) or by calling the Integrity line in your country.

You can find more guidance in our Speak Up Policy.

Thank you for speaking up

Raising concerns about suspected misconduct takes courage, and we applaud that. You can be confident and comfortable in knowing that we have zero tolerance for retaliation against people who do speak up in good faith.

We will do everything we can to prevent this from happening, and take disciplinary action against anyone who does retaliate.