



TERADATA CODE OF CONDUCT FOR BUSINESS PARTNERS

Version: October 2019

The following standards of conduct and principles apply to all Teradata business partners, including distributors, resellers, marketing representatives/partners, vendors, service providers, consultants and contractors, regarding all of their relevant Teradata-related dealings, activities, products, services and information. Together, these standards and principles comprise the “**Teradata Code of Conduct for Business Partners**” (also referred to as our “**Business Partner Code**”):

- **The Teradata Code of Conduct:** <https://www.teradata.com/About-Us/Corporate-Governance/Code-of-Conduct>. (Translations of the Code into 18 different languages are available by following that link and clicking on “Additional Resources”).
- **The Responsible Business Alliance Code of Conduct:** <http://www.responsiblebusiness.org/standards/code-of-conduct/>
- **The United Nations (“UN”) Global Compact Principles:** <https://www.unglobalcompact.org/what-is-gc/mission/principles>
- **The Teradata Conflict Minerals Policy** (regarding Teradata-branded hardware and its components): http://assets.teradata.com/pdf/Corporate/Teradata_Conflict_Minerals_Policy.pdf
- **The Teradata Modern Slavery and Human Trafficking Statement:** <https://assets.teradata.com/resourceCenter/downloads/Teradata-UK-Limited-Modern-Slavery-Statement.pdf>
- **Business-Conduct & Trade-Practices Laws:** *i.e.*, all applicable anti-bribery, anti-corruption, anti-money-laundering, anti-fraud, antitrust/competition and import/export-compliance laws, including, to the extent relevant to the supplier, the United States Foreign Corrupt Practices Act (“FCPA”), the United Kingdom’s Bribery Act, and similar such laws of applicable countries, and relevant provisions of the Teradata Zero-Tolerance Policy for Bribery, Corruption and Money Laundering (https://assets.teradata.com/pdf/Teradata_Anti-Bribery_and_Anti_Corruption_Policy.pdf). For translations of Teradata’s Anti-Bribery Policy, click on the “Additional Resources” link on Teradata’s Code of Conduct webpage here: <https://www.teradata.com/About-Us/Corporate-Governance/Code-of-Conduct>).
- **Data Protection Laws & Standards:** *i.e.*, all applicable data privacy, data protection, cross-border data transfer and cyber-security laws, including, as applicable, the EU’s General Data Protection Regulation (“GDPR” - <https://www.eugdpr.org/>), the U.K. Data Protection Act, the California Consumer Privacy Act, and relevant provisions of the Teradata Global Privacy Policy (<https://www.teradata.com/Legal/Teradata-Privacy-Policy.pdf>).

The Teradata Ethics Helpline

Teradata business partners, their employees, and others may report suspected violations of the Teradata Code of Conduct or Teradata Business Partner Code through the Teradata Ethics



Helpline. They also may seek guidance and raise questions regarding Teradata-related ethics and compliance issues through that Helpline.

The Teradata Ethics Helpline is accessible around the clock and in multiple languages, it is administered by a third party, and (to the extent permitted by applicable law) it accommodates anonymous and confidential reporting.

The Teradata Ethics Helpline may be reached by telephone at 1-866-455-0993 or online at <https://tdhelp.alertline.com>. The Teradata Ethics and Compliance Office may be reached directly by e-mail at E&C@teradata.com.

Administrative Guidelines

Teradata recognizes that many Teradata business partners already may have their own company codes or standards of conduct, compliance policies, compliance training, and other compliance processes, and are subject to or have agreed, adopted or pledged to comply with laws and the standards and principles of various industry or business codes or standards of conduct (collectively, their own “**Ethics & Compliance (‘E&C’) Programs**”).

Teradata’s approach to administering its Business Partner Code is not to impose duplicative processes or necessarily impose the particular word-choices reflected in Teradata’s Business Partner Code on Teradata business partners who effectively meet or exceed the standards and principles reflected in the Teradata Business Partner Code through the business partner’s own E&C Program.

Teradata also recognizes that not all of the standards and principles of the Teradata Business Partner Code are necessarily relevant to all Teradata business partners or to what a particular business partner actually does or does in connection with its business partner relationships with Teradata.

Thus, a Teradata business partner may conform to the standards and principles of the Teradata Business Partner Code by either:

- (1) the business partner directly applying and complying with Teradata Business Partner Code with respect to the business partner’s relevant Teradata-related dealings, activities, products, services and information; or
- (2) the business partner having and effectively implementing its own E&C Program, provided that its E&C Program is no less stringent and no less compliant with laws than the standards and principles of the Teradata Business Partner Code with respect to the business partner’s relevant Teradata-related dealings, activities, products, services and information.

Each Teradata business partner is required, when requested by Teradata, to confirm in writing or electronically to Teradata that the business partner is aware of the Teradata Business Partner Code and certify that the business partner (through either of the means described above) has complied, and will at all times in the future comply, with the standards and principles of the Teradata Business Partner Code with respect to all of the business partner’s relevant Teradata-related dealings, activities, products, services and information.