

CODE OF BUSINESS CONDUCT AND ETHICS

DOING BUSINESS
THE RIGHT WAY —
THE RIMINI STREET WAY



Rimini Street[®]



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A Message from the Chairman and CEO

Team,

I am proud to be a member of this high-performing, client-focused organization that we continue building together, and I hope you are too.

Among the many reasons I am so proud of Rimini Street is our unwavering commitment to the Rimini Street Way — recognizing that the best and only path to success means that we must do the right things; that we must conduct ourselves in a way that demonstrates the highest integrity as well as respect for others and for the laws, regulations, and court orders by which we operate. This commitment starts with building, marketing, and selling our products and services; servicing our clients; and making business decisions based on a shared system of beliefs — our Core Values. These Core Values serve as the foundation upon which we manage and grow our business in a prosperous way as we help our clients extract the greatest value from their enterprise software, invest in innovation, create competitive advantage, and enable growth.

The ***Rimini Street Code of Business Conduct and Ethics*** sets forth the basic standards by which we conduct our business, and it provides all Rimini Street employees with the guidance needed to keep integrity at the heart of our culture. The Code provides clear standards, helpful examples, and information about where to go when we need guidance about ethical decision-making or compliance concerns.

Embracing the Code is part of the commitment we make to Rimini Street, to each other, to our clients, to our business associates, to our stockholders, and to the communities in which we work and live. We all must put Rimini Street's Core Values first, and always act with integrity. Please take the time to read and understand the Code. If you have any questions or



The best and only path to success means that we must do the right things.

concerns — or just want to get a second opinion on a complex matter, seek guidance **before** making a decision or taking action. And if you come across an issue of concern, you should report it immediately — it's your responsibility to do so.

Although the Code covers a broad range of subjects, it cannot possibly address every question that you may have or every situation that you may encounter in our complex world and global operation. Nor is the Code ever a substitute for good judgment. When in doubt, always seek guidance from one or more of the resources referenced in the Code. Failing to comply with the Code is not acceptable and could put you, your colleagues, and Rimini Street at financial, legal, and/or reputational risk. Non-compliance with the Code may also result in clawbacks of bonus or other incentive-based compensation and/or in disciplinary action up to and including termination.

I'm excited to be working with each of you as we continue our passionate journey to provide the best service available to clients around the world, grow our Company, and do it the right way — the Rimini Street Way.

Sincerely,

Seth A. Ravin

Co-Founder, Chairman and
Chief Executive Officer

Who is Rimini Street?

As we grow and evolve, our shared Purpose, Mission, and 4C's continue to guide and drive us.

Purpose

Create a better world through equal opportunity for all

Mission

Provide extraordinary technology solutions powered by extraordinary people that achieve each client's strategic, operational, and financial goals

The Rimini Way

- We strive to deliver the extraordinary, always
- We choose what is right, not what is easy
- We stand for equality and fairness for all
- We act with urgency, driven by our passion for quality



Our 4 C's

Company

Dream big, innovate boldly, and operate at the highest ethical, professional, and quality standards

- Taking ownership and pride in all we do
- Prioritizing client over company

Clients

Improve client performance significantly

- Relentlessly pursuing solutions for clients
- Delivering unmatched client care rooted in passion for service

Colleagues

Build a great company that attracts, develops, inspires, and retains extraordinary people

- Sharing a common purpose, mission, and values
- Fostering a high-performance, results-focused culture based on mutual respect, professionalism, and appreciation

Communities

Leave the world better than we found it

- Offering a helping hand
- Creating equal opportunity for all

Rimini Street

Getting Started: Understanding the Code and Your Responsibilities

At Rimini Street, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. To further this commitment, Rimini Street has implemented its Global Ethics and Compliance Program, which is designed to communicate the ethical and legal standards that govern our business conduct. The following section of the Code, *Getting Started – Understanding the Code and Your Responsibilities*, provides an overview of the Code, summarizes your role in doing business the right way, and tells you how you can raise concerns or seek guidance on a variety of topics.

Why do we have a Code?

The **Rimini Street Code of Business Conduct and Ethics** (the “Code”) is our roadmap for doing business the right way — the Rimini Street Way. Put simply, you do business the right way when you act ethically and consistently with our Core Values, the Code, our policies, and the law.

Each of us is expected to embrace the principles of the Code and follow the Rimini Street Way in our workplace, in our marketplace, in our business operations, and in the global community.

Who must follow the Code?

The Code applies to anyone who works for or on behalf of Rimini Street, Inc., its subsidiaries, or controlled affiliates (collectively, “Rimini Street” or the “Company”). This includes:

- All Rimini Street officers and employees around the world (including officers and employees of our subsidiaries).
- Members of the Rimini Street, Inc. Board of Directors and directors of Rimini Street

subsidiaries, when they act in their capacity as directors.

- Entities in which Rimini Street owns more than 50 percent of voting rights or which Rimini Street has the right to control and every employee, officer, and director of such entities.

Rimini Street also expects all suppliers, consultants, contractors, and other service providers who work with or on behalf of our Company to act ethically and in a manner consistent with the standards set forth in our **Supplier Code of Business Conduct and Ethics**.

Rimini Street’s Ethics & Compliance Department (“Ethics & Compliance”) is accountable for promoting, monitoring, and enforcing the Code under the oversight of the Rimini Street, Inc. Board of Directors. However, the ultimate responsibility for following the Code and for maintaining Rimini Street’s culture of compliance rests with each employee.

Remember ...

The Code is the cornerstone of the Company’s Global Ethics and Compliance Program. It sets forth the basic principles we must follow to uphold our Company’s ethical and compliant business culture. It sets expectations as to required conduct, guides us in the resolution of ethical dilemmas, and provides contact information and other resources to assist in addressing our questions and concerns.

What is expected of me?

Employee responsibilities. Every Rimini Street employee has a responsibility to:

- Read and understand our Core Values and use them in your job every day.
- Follow the law at all times. If there is a conflict between our legal and ethical standards and our business objectives, ensure our legal and ethical standards always come first.
- Read and understand the Code and the other policies that apply to your job. No one expects you to memorize every policy, but it's helpful to have a basic understanding of the issues covered by each policy.
- Ask for help from your manager, Ethics & Compliance, or one of the other Rimini Street resources identified in the Code when you have questions about the application of the Code or other policies.
- Never cover up or ignore any ethical conduct problem. Address the matter timely and seek guidance if necessary.
- Immediately raise any concern you may have about suspected or actual misconduct, including violations of the law, the Code, or other Rimini Street policies. The various ways to raise concerns are described in more detail later in the Code.
- Cooperate with Rimini Street's investigations and report all information truthfully.

Additional responsibilities for management.

All managers are responsible for creating an environment that encourages compliance with the Code. To help us maintain the highest level of integrity, you should:

- Meet with your direct reports periodically to ensure they understand our Mission, Core Values, the Code, and other policies that apply to their jobs.
- Lead by example and encourage your employees to act with integrity in all that they do.
- Ensure open communication by encouraging employees in your department to ask questions concerning the Code.
- Contact Ethics & Compliance if you are made aware of an ethics issue or need assistance handling an ethics question or concern.
- Never retaliate against anyone for raising an ethics issue, assisting in an investigation, or participating in any proceeding relating to an alleged violation of any law or regulation.
- Once an ethical concern is raised, do not interfere with any investigation into the matter.
- Encourage self-reporting of business conduct violations. If an employee voluntarily reports he or she was involved in an ethics violation, self-reporting may be considered when determining the appropriate disciplinary action to be taken.

Q&A

Where can I find Company policies?

The last page of the Code contains links to many of the Company's global compliance policies. Rimini Street has also adopted other internal corporate policies, including country-specific and function-related policies, covering a variety of topics. Because these policies may vary by business unit or market, they are not linked to the Code. You can find all Rimini Street policies on our Company intranet sites. You can also ask your manager or HR for copies of applicable policies.



How do I seek guidance and report concerns?

The Code cannot address every possible situation that you might encounter in your daily work. If you cannot find an answer in the Code or if you have questions about how to interpret the Code, ask for help. And if you are aware of something that may be a violation of the Code, our policies, or the law, you must speak up and report it so it can be addressed.

Q&A

How will I know if there is a problem?

The Code covers the most commonly encountered legal and ethical issues. It cannot, however, address every situation that may arise. If ever in doubt about a course of action, ask yourself:

- Is this course of action illegal?
- Would it violate the Code or other policies?
- Could it be considered unethical or dishonest?
- Could it hurt Rimini Street's reputation or put our Company at risk?
- Will this hurt employees, clients, investors, or other third parties?
- Will it reflect poorly on me or Rimini Street? Would I be embarrassed or ashamed if others knew about it?

If the answer to any of these questions is “yes,” don’t do it. If you are still uncertain, seek guidance from Ethics & Compliance or one of the many other resources available to you.

You have several channels to seek guidance or report concerns:

- **Your direct manager or next-level manager.** Your managers are excellent resources for guidance related to many Company and job-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to the work environment. In most cases, your direct manager is the best way to get your questions answered and address issues and concerns. If you are unable to address your questions or concerns with your direct manager, speak to another member of your local management team.
- **Your local Human Resources manager or business partner.** Your Human Resources representative can help you with human resource issues and concerns or help you find the right person to answer your questions.
- **Ethics & Compliance Department.** Any member of the Ethics & Compliance team is a resource that you can contact if you have a question or concern; suspect a violation of the law, the Code, or another Rimini Street policy; or are uncertain where to turn for help.

For contact information for Ethics & Compliance and the other resources available to you, please see the last page of the Code.

In addition to the resources listed above, you can ask questions, raise concerns, or make reports of suspected compliance violations by contacting the Rimini Street Compliance Helpline.

To assist Rimini Street in investigating your report, you are encouraged to communicate fully and

The Compliance Helpline is a 24-hour, toll-free ethics hotline available to all Rimini Street employees, clients, suppliers, contractors, and other business associates.

The Compliance Helpline is available anywhere in the world:

- By phone, using a special toll-free telephone number based on the country from which you are calling. In the United States, call **844-754-3342**. For a list of international country phone numbers, see our Compliance Helpline section at www.riministreet.com/company/ethics-and-compliance
- By web, available at <https://riministreet.i-sight.com/portal>

provide all of the information you may have about the matter you are reporting. The information will be kept confidential, except as needed to conduct a full, fair investigation. You may remain anonymous if you so choose, except where restricted by local law. Your identity, phone number, or IP address will not be recorded or included in any report that is provided to Rimini Street, unless you voluntarily provide such information.

Note: Due to local privacy laws in certain countries and the European Union, the Compliance Helpline may permit only specific types of calls, such as accounting, financial, auditing, and bribery matters. In those countries, contact your Human Resources manager to report other issues.



What if I am concerned about retaliation?

Retaliation is strictly prohibited at Rimini Street. Employees who come forward with concerns play an important role in maintaining a healthy, respectful, and productive workplace, as well as protecting our stakeholders. These employees help our Company address problems early — before more serious consequences develop. It's important for each of us to create a work environment where everyone can raise concerns of ethics issues without fear of retaliation.

Rimini Street is committed to protecting the rights of those individuals who report issues in good faith either through one of the reporting means described in the Code or to government authorities. Our Company will not retaliate or permit retaliation against a person who in good faith:

- Reports what he or she believes is a violation of the Code, our policies, or the law.
- Raises a compliance question or seeks advice about a particular business practice, decision or action.
- Cooperates in an investigation of a potential violation.

Retaliation against an employee for reporting an issue in good faith is itself a violation of the Code. If you know or suspect that retaliation has occurred or is occurring, you should report it.

What are the consequences of violating the Code?

If you violate the Code, the Company will take appropriate disciplinary action. You are expected to follow the Code and comply with our policies and the law while conducting business on behalf of Rimini Street as a condition of your employment. Violating the Code, our policies, or the law may result in:

- Disciplinary action, up to and including termination of employment, depending on the nature and severity of the Code violation.
- In the case of a violation of law, civil and/or criminal penalties may be imposed by a governmental agency or a court.
- Clawback of bonuses or other incentive-based compensation

Key Terms

Rimini Street prohibits retaliation against any employee who raises a concern in “good faith.” **Good faith reporting** means you have made a genuine attempt to provide honest and accurate information, even if you are later proven to have been mistaken. However, it is a violation of the Code to knowingly make a false statement or accusation, to lie to an investigator, or to interfere or refuse to cooperate with an investigation.

Q&As

Will I get into trouble with my manager if I contact the Compliance Helpline about an ethics issue?

No. It is a violation of the Code for any employee to retaliate against another employee for reporting a concern or possible policy violation in good faith. We encourage you to raise concerns and ask questions about ethics and compliance issues using one of the many resources available to you.

Is protection from retaliation only available if I report my concerns through the Compliance Helpline?

Retaliation is unacceptable no matter how you report your concern whether through management, Human Resources, or the Compliance Helpline. If you believe you have been retaliated against, report your concern to Ethics & Compliance.

What happens when I contact the Compliance Helpline?

Compliance Helpline calls are answered by an independent third party with expertise in handling hotline calls. A call center representative will ask you questions and send a report to Rimini Street's Ethics & Compliance Department for a confidential review. Appropriate professionals designated by Ethics & Compliance will investigate concerns, and, if warranted, remedial actions will be taken.

Remember ...

It is our responsibility to follow the Code, company policies, and all applicable laws, regulations and court orders. Failure to comply can carry serious consequences, which include, depending on local law, clawbacks of bonus or other incentive-based compensation and/or in appropriate disciplinary action up to termination of employment.

Following the Rimini Street Way In Our Workplace

As Rimini Street team members, we all make daily decisions regarding how we will do our jobs and how we will work with our fellow employees, clients, and business associates. Our success as individuals and as a company requires that we act with integrity in all that we do. The following section of the Code, *Following the Rimini Street Way in Our Workplace*, outlines what is expected from each of us in our treatment of others.

Diversity and Inclusion

As a global company, we believe that diversity contributes to the success of our business. We value the unique contributions of individuals with varied backgrounds and experiences, and we believe an inclusive culture allows our employees to contribute their best. We also strive to attract, develop, and retain a workforce that is as diverse as the clients and the markets we serve, and to ensure an inclusive work environment that embraces the strength of our differences.

You play an important role in creating a work environment in which employees and business partners feel valued and respected for their contributions. You promote diversity and inclusion when you:

- Respect the diversity of each other's talents, abilities and experiences.
- Value the input of others.
- Foster an atmosphere of trust, openness, and candor.

We will better understand the needs of our clients and foster innovation if each of us embraces diversity and inclusion in all aspects of our business.

Anti-Discrimination

Each of us should have the opportunity to reach our full potential and contribute to Rimini Street's success. To accomplish this, you should never discriminate or treat employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment.

Your employment decisions regarding employees and applicants must always be based on job-related factors, without regard to non-job-related characteristics such as: race, color, ancestry, citizenship, national origin, religion, veteran status, disability, medical condition, genetic characteristic or information, age, gender, sexual orientation, gender identity or expression, sex, creed, marital status, family status, pregnancy, or other legally protected status.

Basing employment decisions on any of these personal characteristics is against our policies and is illegal under the laws of many countries. You must always act fairly and give qualified individuals the chance to develop their abilities and advance within our Company in accordance with their own abilities.



Anti-Harassment

We must also ensure that our workplace is free from all forms of harassment. While the definition of harassment may vary from one country to another, Rimini Street considers harassment to be any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive, or hostile work environment.

Harassment can take many forms, including:

- Unwelcome conduct — whether verbal, physical, or visual, and whether committed in person or in some other way (for example, via email or social media) — that is based on a person's protected status.
- Racial slurs, ethnic, religious, age or sex-based insults, comments, stereotypes, or jokes.
- Bullying, abusive conduct or language, physical aggression, threats of violence, intimidating or violent behavior.
- Sexual harassment, such as sexual advances, requests for sexual favors, unwelcome touching, sexually charged or visual communications, or other physical or verbal conduct of a sexual nature.

Regardless of the form it takes, discrimination and harassment negatively affect individual work performance and our workplace as a whole and will not be tolerated. If you experience or become aware of an act of discrimination or harassment, you have a duty to report it.



Key Terms

Workplace bullying is a pattern of repeated mistreatment that harms, intimidates, undermines, offends, degrades, or humiliates an employee. Bullying situations may involve physical or verbal threats, insults, or public humiliation, not practicing inclusive behavior, and similar types of overly rude or inappropriate actions or communications.

Sexual harassment may consist of verbal, visual, or physical conduct of a sexual nature that is unwelcome and that a reasonable person would find offensive. It can take many forms, such as:

- Sexual advances, requests for sexual favors, or unwelcome demands for dates.
- Sexually oriented jokes, pictures, text, or email messages.
- Explicit or degrading comments about appearance.
- Display of sexually suggestive pictures or pornography.

Health and Safety

We are committed to maintaining the health and safety of our employees, business partners, visitors, contractors, clients, and communities. Our health and safety policies and procedures are designed to help you to work safely.

Acts or threats of violence interfere with our commitment to health and safety and will not be tolerated. Any threatening behavior, even if made in a seemingly joking manner, must be reported immediately.

Drugs and alcohol in the workplace affect everyone's safety. Being under the influence of either can negatively affect job performance and cause severe safety hazards. We may not possess, distribute, or be under the influence of illicit drugs while on Rimini Street premises or when conducting Company business. In addition, we must always conduct ourselves in accordance with all applicable Rimini Street policies, especially with respect to the possession or use of alcohol, prescription drugs, and other controlled substances.

You should always speak up and raise a concern if you are asked to do a task you consider unsafe or you observe or are made aware of an unsafe condition or a potential danger to yourself or others.

Personal Conduct

Our clients, business associates, stockholders, and the general public take note of how we conduct ourselves in work-related settings, including while on business trips, at business meetings, and at business-related social events. While on the job and while representing Rimini Street, we should conduct ourselves in a responsible, respectful, and honest manner when we interact with others.

Q&A

On a conference call, another employee called me a disrespectful name associated with my nationality. What should I do?

Immediately report the incident to management or contact the Compliance Helpline.

Following the Rimini Street Way In Our Marketplace

Rimini Street strives to provide high-quality products and services in an efficient manner. However, we must hold fast to our high standards of integrity and ethical business conduct as we pursue our corporate goals. The following section of the Code, *Following the Rimini Street Way in Our Marketplace*, outlines what is expected from each of us to accomplish this goal.

Fair Dealing

Rimini Street has become an industry leader based on the quality of our people, products, and services. Our commitment to fair dealing means that we:

- Provide only honest and truthful information to our clients, business partners, suppliers, and competitors.
- Never misrepresent facts in order to gain a competitive advantage.
- Never engage in any illegal or unethical conduct when competing.

Antitrust and Fair Competition

Rimini Street is committed to outperforming our competitors legally and ethically within the framework of a free enterprise system. Therefore, you should:

- Never comment on competitors' products or services in an inaccurate or untruthful manner.
- Only use legitimate means of obtaining competitive information.
- Respect the confidential information and intellectual property rights of our competitors and other third parties.
- Always comply with antitrust and competition laws.

When dealing with competitors, you should never enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale; coordinate bids; allocate clients, sales territories, or product lines; or engage in any other activity that violates antitrust or competition laws. You should never discuss such topics with a competitor, even in an informal setting such as a trade show or client event.

Violations of antitrust or competition laws may result in imprisonment for the individuals involved, as well as severe legal penalties for both the individuals and our Company. Competition laws are complex and vary by country. For guidance, you should refer to our **Antitrust Compliance Policy** or consult the Legal Department. If you suspect an antitrust violation, report it immediately.



Q&As

I just received some confidential information about a competitor. I didn't ask for it, but this kind of information could be very useful to me. What should I do?

Before you read, copy, or distribute this information, contact the Legal Department to discuss what the information is and how it was obtained. That will determine whether or not you may use it. If you are allowed to use it, follow the Legal Department's instruction for documenting the source of the information.

While at an industry trade show, a competitor's sales representative, who works in your territory, asks you to lunch in order to discuss a sales opportunity that will be "mutually beneficial." What should you do?

Before responding to the invitation, consult with the Legal Department or Ethics & Compliance for guidance.

Anti-Money Laundering

Money laundering is the process of taking cash or assets obtained from illegal activities into legitimate financial activities. Rimini Street's operating practices ensure that our employees, products, services and facilities will only be used for legitimate purposes. You must not participate in or facilitate money laundering and you must not engage in conduct that is designed to avoid the Company's financial controls. Failure to comply could result in disciplinary action up to and including clawbacks and/or termination.

Marketing and Sales Practices

Rimini Street's marketing and sales practices must reflect our high ethical standards, and must be truthful, understandable and in compliance with all laws. We must:

- Make only fair, factual comparisons between our products and those of our competitors.
- Never misstate facts or confuse or mislead current or prospective clients about Company advertisements or promotions.
- Follow all applicable Rimini Street sales policies and procedures to ensure we do not engage in unethical or deceptive sales practices.
- Never place or record an order for our products and services for a client without that client's authorization.

Competitive Information

Gathering information about our product and service categories is essential to protecting our market position, but we must be careful to acquire information only in a legal, ethical, and respectful manner. If a co-worker, client, or business partner is in possession of competitive information that must be kept confidential, we must not encourage them to disclose it to us. Be particularly mindful of this restriction when talking to new Rimini Street employees about their former employers.

While conducting Rimini Street business, if you obtain or become aware of confidential, trade secret, or proprietary information about another company or competitor that has been inadvertently or intentionally disclosed, consult or the Legal Department or contact the Compliance Helpline. Do not use or act on this information. We must not use information if we have no legal or ethical right to it.

Transactions and Relationships with Suppliers

At Rimini Street, we select our suppliers based on financial and nonfinancial objective criteria, such as risk profile, quality, and total cost of service. We believe in doing business with suppliers who embrace and demonstrate our high standards of integrity and ethical business conduct. We expect others working with or on Rimini Street's behalf, including suppliers, to act ethically and in a manner consistent with our

Remember ...

We must never ask a supplier or other third party to engage in any activity that violates the ethical and legal standards set forth in the Code or the **Supplier Code of Business Conduct and Ethics**.

“*Supplier Code of Business Conduct and Ethics.*” If you are responsible for evaluating and hiring suppliers or other third parties to work on behalf of Rimini Street, you should take reasonable steps to ensure these suppliers and third parties have a reputation for integrity and act in a responsible manner consistent with our ethical standards. This may include consulting with Procurement, Legal Department, or Ethics & Compliance colleagues before hiring third parties or suppliers.

Business Courtesies — Gifts, Meals, and Entertainment

In general, Rimini Street does not believe in offering gifts to or accepting gifts from third parties due to the risk of an appearance of improper conduct, and it is easiest to simply not engage in such exchanges. It is important to understand the applicable rules regarding business courtesies and to avoid even the appearance of improper conduct with our clients, suppliers, or any others with whom we do business.

Do

- Accept or give business courtesies only if they comply with the Code, the law, and other Rimini Street policies, including the *Global Business Courtesies Policy*.
- Business courtesies must be appropriate under the circumstances.
- Always use good judgment with business courtesies that involve entertainment.
- Ask if a government official is involved before proceeding.
- Team members who are in a position of procuring goods or services should be particularly mindful of accepting business courtesies in order to avoid the appearance of impropriety.

Business courtesies are broadly defined to include, but are not limited to, gifts; meals; entertainment; travel and lodging; and charitable donations made at the request of a client, supplier, or others with whom we do business. Business courtesies must be reasonable in value, infrequent, provided openly and transparently, given without expecting any return favor or improper benefit or business advantage, and not otherwise creating the appearance of impropriety. Also, please note the following general guidelines:

Do Not

- Never give or accept cash, cash equivalents (such as American Express®, Visa®, or MasterCard® gift cards, gift certificates, or shopping cards) or any other item that can be easily converted to cash.

- Never give or accept lavish or extravagant business courtesies.
- Never provide, accept, or participate in entertainment that is indecent or sexually explicit or that may otherwise harm the reputation of Rimini Street.
- Never solicit business courtesies from suppliers.
- Never accept a business courtesy that would influence — or create an appearance that it would influence — your business decision or judgment.

If you are offered or wish to give a business courtesy that falls outside of these guidelines or does not appear to comply with applicable Company policies, contact Ethics & Compliance to obtain preapproval before accepting or offering the business courtesy. For more information, refer to the ***Global Business Courtesies Policy***.

Special rules apply when offering business courtesies to government officials or their family members. Business courtesies offered to or received from a government official even if part of a commercial contractual arrangement — must be preapproved, in writing, by Ethics & Compliance. For more information, refer to our ***Global Anticorruption Policy*** or contact the Compliance Helpline.

Q&A

A Rimini Street business partner who is bidding on work in my department has offered me her two tickets to a local concert because she cannot make the event. The tickets are not expensive. May I go?

No. Even if the tickets are inexpensive, accepting them would be inappropriate. Since the business partner is not attending the concert with you, this offer is considered a gift. Because this gift was extended during a competitive bidding process, accepting the tickets could suggest to others that the business partner is trying to win your favor and therefore Rimini Street’s business. You must ensure that all business decisions are made objectively and that there is not even the appearance of something improper. Politely decline the offer and report the incident to your manager and to Ethics & Compliance.

Following the Rimini Street Way

In Our Business Operations

As a global company, Rimini Street has many important business assets. However, the Company's most important asset is its reputation with clients, business associates, stockholders, and the general public. The following section of the Code, *Following the Rimini Street Way in Our Business Operations*, describes what is expected of each of us to help safeguard our Company's reputation and assets.

Accurate Business Records

Rimini Street's focus on honesty and integrity underscores our commitment to accuracy in our Company's books and records. Business records, including our financial statements, contracts, and agreements, must always be accurate and reflect an accurate presentation of the facts. No matter what type of document or how insignificant it might seem, the information contained in a business record must always be truthful and complete. Financial records must reflect all components of the financial transactions and events. Likewise, all of your transactions, no matter what the monetary amount, must be properly authorized, executed, and recorded. You are responsible for sharing such

information with the Company as is necessary and relevant to enable the full, fair, accurate, timely, and understandable disclosure in the periodic reports required to be filed by the Company with the U.S. Securities and Exchange Commission ("SEC") and other governmental authorities.

In addition, anything provided to a government official must be properly and accurately recorded in Rimini Street's business records in accordance with our **Global Anticorruption Policy**.

If you notice an inaccuracy in a business record, or a failure to follow our internal control processes, you must promptly report it.

Key Terms

Business records include any document or communication in paper or electronic form that is maintained in the course of business. This covers a wide variety of information, including presentations, spreadsheets, payroll documents, time cards, attendance records, legal agreements, information in filings with governmental agencies, invoices, purchase orders, market research tests, travel and expense reports, inspection records, accident reports, and business plans.

Remember ...

You are accountable for the accuracy of the business records that you handle in the normal course of business. You should never:

- Falsify, omit, misstate, alter, or conceal any information or otherwise misrepresent the facts on any business record.
- Encourage or allow anyone else to compromise the accuracy and integrity of our records.

Public Disclosures

Our investors and the general public rely on our Company, and the law obligates us to report accurately on our business, our earnings, and our financial condition. The disclosures we make in our public communications, regulatory disclosures, and reports submitted to the SEC and to other governmental agencies must always be full, fair, accurate, timely, and understandable.

Our senior financial officers — including, but not limited to, our Chief Executive Officer, Chief Financial Officer, and Chief Accounting Officer — have additional responsibilities. They are required to:

- Help maintain reliable internal controls, assess their quality and effectiveness, implement improvements, and report or resolve weaknesses that could materially affect or render financial disclosures or reports inaccurate.
- Inform the Disclosure Committee of transactions, events, or circumstances that could have a material impact on our Company's financial reports.
- Fairly and accurately represent material facts or circumstances when interacting with our auditors and those individuals who prepare our Company's financial statements.
- Ensure that those who perform accounting or financial reporting functions know and adhere to these principles.

All of us, including our senior financial officers, must immediately report accounting or auditing irregularities. In addition, we must report the following:

- Any violation of any law, rule, or regulation.
- Any incidence of fraud, whether or not material, by any person, including those with accounting or financial reporting responsibilities in connection with financial disclosures, reports, or SEC filings.
- Any material information, including any deficiency in our internal controls over financial reporting, that could affect or render untrue the information contained in our public communications or periodic reports filed with the SEC or other regulatory body.

If you are involved in any aspect of preparing our financial statements or the certifications on which they rely, you must always follow our financial policies, our system of internal controls, and generally accepted accounting principles.

If you learn of potential misconduct related to our financial reporting, accounting, auditing, or internal controls, you have a duty to report it immediately. Please refer to our ***Policy Regarding Reporting of Accounting, Auditing and Other Matters*** for more information.

Fraud and Misrepresentation

Fraud involves deliberate, intentional deception or misrepresentation of information. You misuse Company resources and commit fraud when you intentionally conceal, alter, falsify, or omit information for your benefit or the benefit of others. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline). Examples of fraud include:

- Misstating financial information in our Company's business records.
- Presenting false medical information to obtain disability benefits.
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work.

You should also avoid the appearance of fraud. For example, never spend Company funds without proper approval. Similarly, never enter into an agreement on behalf of our Company unless you are authorized to do so.

Engaging in any type of fraudulent activity at Rimini Street is never acceptable. If you learn of a potential fraud, report it to the Compliance Helpline.

Conflicts of Interest

All team members are expected to act in the best interest of Rimini Street at all times and be aware of actual and potential conflicts of interest. A conflict of interest occurs when our personal interests interfere in any way with the interests of Rimini Street. Actual conflicts — as well as the appearance of conflicts — must be avoided.



Key Terms

A **conflict of interest** occurs when a personal interest, such as an activity, investment, relationship, professional association, or outside employment, competes with Rimini Street or interferes with our ability to make sound, objective business decisions on behalf of the Company.

Some situations involving potential conflicts of interest include:

- Outside employment — or conducting non-Rimini Street business — with a Rimini Street business partner, supplier, competitor, or client.
- Investing or having a financial interest in a Rimini Street business partner, supplier, competitor, or client.
- Service on a board of directors or as advisor of an organization whose interests conflict with Rimini Street.
- Family or close personal relationships within Rimini Street.
- Pursuing a business opportunity for yourself that you learned about through your work at Rimini Street.

Outside Business Activities: Outside business activities, such as employment, self-employment, or working on a consulting basis, are permitted only if they do not involve cooperating with or becoming a client, competitor, or supplier of Rimini Street. Rimini Street team members are expected to devote their full working time and attention to their duties for Rimini Street. As such, permitted outside business activities must be conducted during nonworking hours only and cannot interfere with your job duties at, or performance of satisfactory work for, Rimini Street.

Financial Interests: Conflicts of interest may arise when you have a significant financial interest in or receive any personal benefit from a current or prospective client, supplier, or competitor or have a family member who does.

Q&A

I am planning to start a side business, providing consulting services in my spare time. Are there any conflicts of interest concerns with this?

It depends on the nature of the consulting services. As long as such services do not compete with Rimini Street's business, including the products and services we sell, and you do not use Rimini Street's time, resources, or business relationships in support of your own business, it is likely OK. The best approach is to disclose your plans to your manager and Ethics & Compliance and obtain approval in writing. And remember, any outside business pursuit should not interfere with your time committed to, and job performance at, Rimini Street.

Q&A

What is a “significant financial interest”?

A “significant financial interest” is a direct or indirect aggregate interest of an employee or their family member in any outside enterprise that conducts business, seeks to conduct business, or competes with the Company. As a minimum standard, a “significant financial interest” is defined as more than:

- 1% of any class of the outstanding securities of a firm or a corporation.
- 10% interest in a nonpublic company, partnership, or association.
- 5% of the total assets or gross income of the employee.

Board Service: While serving on a board of directors for a nonprofit organization is encouraged and does not require prior approval from Ethics & Compliance, you are required to obtain prior approval from your direct manager as well as the Company's CEO or the EVP with responsibility over Global Human Resources, and you may only accept the position if it does not interfere with your job performance at Rimini Street.

Family or Close Personal Relationships: We encourage the family of team members to work for Rimini Street; we believe it creates greater commitment and loyalty to our Company. However, we must observe certain rules in these circumstances. To avoid a personal conflict of interest or the appearance of one, we will not hire, continue to employ, promote, or transfer a team member to a position where their relationship to another team member:

- Creates a direct supervisory/subordinate relationship with a family member or romantic partner;
- Has the potential for creating an adverse impact on work performance, safety, security, or morale; or
- Involves an actual or potential conflict of interest or the appearance of a conflict of interest.

If a change in personal relationships occurs for current team members that results in an actual or potential conflict of interest, the Company will make reasonable efforts to minimize problems of supervision, safety, security, or morale through reassignment of duties, relocation, or transfer.

Corporate Opportunities: Rimini Street property and confidential information or your position with Rimini Street should never be used for personal gain, nor should you personally gain from a business opportunity that is discovered because of your job with Rimini Street.

The key to addressing conflicts of interest is prompt and full disclosure. It is your responsibility to tell your manager about any situation you think creates, or could create, a conflict of interest. Managers are encouraged to bring such matters to the attention of Ethics & Compliance for advice. If you are ever in doubt as to whether a particular activity may be a conflict of interest or create the appearance of a conflict of interest, contact Ethics & Compliance or the Compliance Helpline.

Directors and executive officers may be subject to additional restrictions above and beyond those stated above. Please refer to Rimini Street's **Corporate Governance Guidelines** for additional information.

Protecting Company and Third-Party Assets

Rimini Street relies on you to use Company assets honestly and efficiently. Assets include physical property, such as facilities, supplies, equipment, and Company funds. They also include intangible assets, such as Company time, confidential information, intellectual property, and information systems. You should use Company assets only for legitimate business purposes and protect them from theft, loss, damage, or misuse. If you are aware of Company assets being misused, report it.

Company Funds

The obligation to protect Company funds is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts. You must always:



Remember ...

If your direct involvement in a particular transaction would constitute a conflict of interest, you cannot avoid the conflict of interest simply by acting through a relative or other party (such as a spouse's company, investments in someone else's name, etc.).

- Ensure the funds are properly used for their established purpose.
- Obtain required approval before incurring an expense.
- Accurately record all expenditures.
- Verify that expenses submitted for reimbursement are business-related, properly documented, and comply with our policies.

Confidential Information

During your employment, you may have access to information about Rimini Street, its employees, business, or operations that is confidential, competitively sensitive, and/or proprietary. You should assume that Company information is confidential or competitively sensitive unless you have clear indication that Rimini Street has publicly released or otherwise authorized the disclosure of such information. Even within our Company and among your coworkers, you must only share confidential information on a need-to-know basis.

In addition, some of us may receive or have access to confidential, sensitive, or proprietary information about our clients, suppliers, business associates, or other third parties. We have a duty to safeguard this third-party information and honor all contractual commitments and legal requirements. Our obligation to safeguard third-party information continues even after employment ends.



Remember ...

Always take reasonable and necessary precautions to protect any confidential information relating to Rimini Street or to third parties. You should not disclose any confidential information to anyone outside Rimini Street, even to members of your own family, unless the disclosure is:

- Properly authorized.
- In connection with a clearly defined, legitimate business need.
- Subject to a written confidentiality agreement approved by the Legal Department.

Intellectual Property

Our intellectual property, or IP, is another important Company asset that must be protected at all times. IP refers to certain intangible assets developed through creative work done by our employees and partners. IP is safeguarded by legal protections including patents, trademarks, copyrights, and trade secrets. Our technology, software, and technical data contain large amounts of IP, and our policy is to protect the Company's IP rights to the fullest extent possible. You should never allow a third party to use our IP without proper authorization and a license agreement that has been approved by the Legal Department.

In addition to protecting our IP, we also respect the IP rights of others. This includes avoiding infringement of any third party's patents, trademarks, copyrights,

in order to protect it from theft or loss. Confidential data may be stored on Company devices or held or processed by third parties on our behalf and in accordance with applicable law. Appropriate controls should be put in place to protect confidential data, such as restricting access on a "need to know" basis, password protection, encryption, and physical security. Only share information (such as through email, postings to social media sites, and granting systems access) based on a real business need.

While in some locations occasional personal use of these systems is permitted, our usage must be appropriate and in line with existing local policies and must not interfere with our daily work.

To the extent permitted by local law, Rimini Street reserves the right to monitor, record, disclose, audit,



Remember ...

You should exercise caution in obtaining third-party software from others, including commercial and open source software. Software can include computer programs, databases and related documentation and can be in any stage of development. Software may be on tangible media (e.g., CDs, portable devices, and publications), or it may be downloadable or accessible for use online. The license for the software sets out the rights and obligations that must be complied with, such as how and where the software may be used, whether it may be modified or distributed and, possibly, what rights Rimini Street is obligated to grant to others. The terms and conditions of the license agreement must be strictly followed.

Do not confuse open source software with software that is in the public domain. Open source software licenses often impose obligations that could result in a conflict of interest with Rimini Street and the inappropriate transfer of Rimini Street's intellectual property rights. If you want to be involved with or use open source software, you must first obtain approval from the Legal Department.

and trade secrets. When we work with third parties, we have a duty to ensure through contracts that our Company obtains appropriate rights to IP created in such engagements.

Please refer to Rimini Street's **Acceptable Use Policy** for more information. If you have questions or concerns about our Company's IP or the IP of a third party, contact Ethics & Compliance or Global Security for assistance.

Email, Internet, and Information Systems

We each have a responsibility to use our Company's network, communications, and information systems ethically and legally and with special care. We should secure all confidential data using good judgment

and delete without prior notice the nature and content of an employee's activity using our Company's email, phone, voicemail, internet, and other systems. The Company also reserves the right to block access to inappropriate Internet websites, as well as the transmission of inappropriate emails or files.

For more information, please refer to our **Information Security Management Policy** as well as related policies and procedures. And if you suspect a data breach or become aware of any situation in which our Company's physical premises, network, computers, or information systems have been compromised, immediately report the situation to your manager or to Global Security.

Data Privacy

Many countries have privacy laws that govern the appropriate collection and use of personal information. Personal information broadly refers to any information that identifies or relates to an identifiable person, such as an email address, physical address, payment card information, or government identification number. If you access this type of information or the systems that process it, you must comply with all applicable policies and laws regarding the processing of such information. You must:

- Only access, collect, and use personal information that you need and are authorized to handle for legitimate business reasons.
- Disclose personal information only to authorized persons who have a legitimate business reason to know the information and who are obligated to protect it.
- Securely store, transmit, and destroy personal information in accordance with applicable policies and laws.
- Promptly report any actual or suspected violations of our policies or applicable privacy laws, actual or potential data breaches, or other risks to personal information through the Compliance Helpline.

Remember ...

To safeguard our information systems, you should never:

- Share your Rimini Street system passwords with anyone.
- Leave laptops, phones, or other mobile devices unattended while traveling or in an exposed location where they can be stolen.
- Download unauthorized or unlicensed software on Rimini Street computers.

Rimini Street is committed to complying with applicable privacy laws in the countries where we conduct business, including such laws regarding the cross-border transfer of certain personal information. Consult with Ethics & Compliance if you have any questions, including about how to comply with rules about transfer of personal information outside of the country in which it was collected.

Records Management

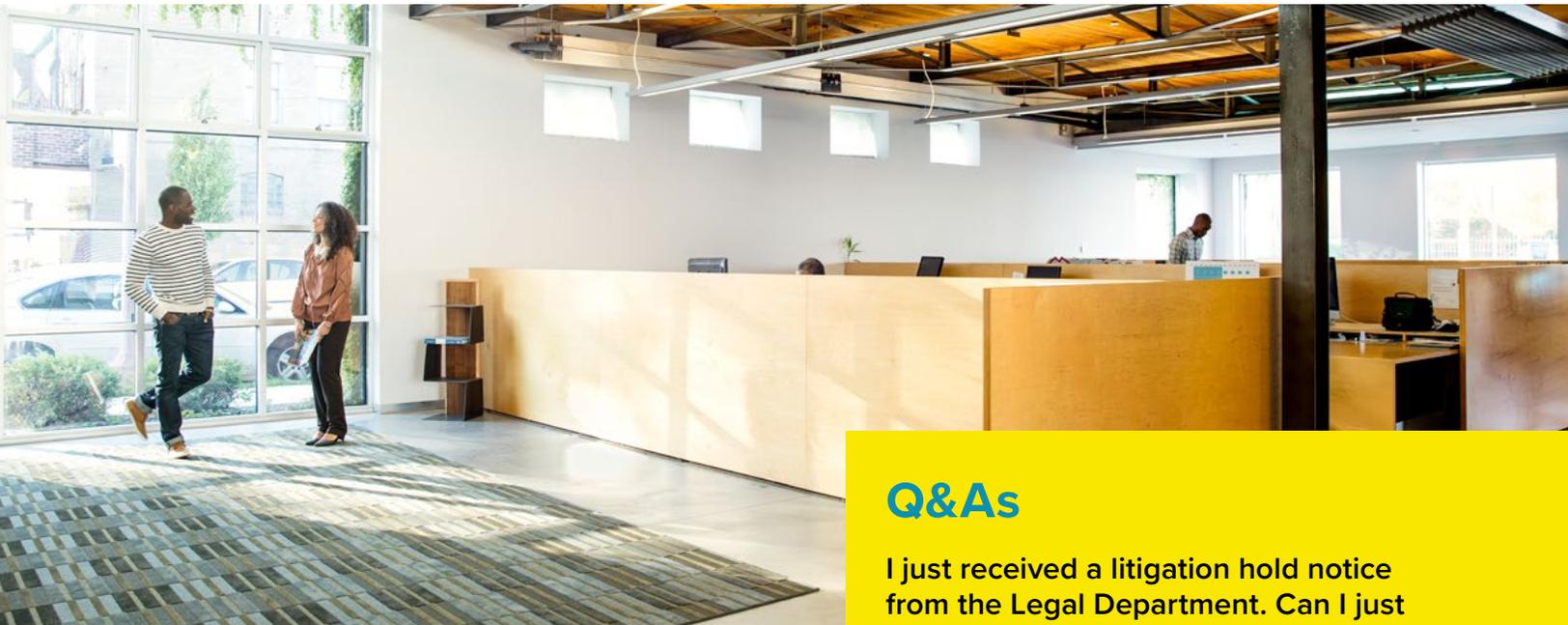
Rimini Street generates a large volume of records and documents each day. The business records that you work with must be maintained, retained, and destroyed in accordance with all legal and regulatory recordkeeping requirements. To manage your business records properly, you should:

- Comply with our records management policies for all documents, files, electronic records, and emails.
- Follow the instructions in all litigation hold notices or similar record retention notifications.

Q&A

I occasionally work at home on my own personal computer. I take paper and electronic files containing client information home with me and return the updated electronic files to the office. Is this OK?

No. If you must work at home, you should use a Company-issued laptop computer or approved mobile device and follow appropriate security measures. Your personal computer should not be used to work on client information.



You should consult the Legal Department if you have specific questions about the retention period of a document or if you have questions concerning the documents referred to in a litigation hold notification. Destruction of documents subject to a litigation hold notice, even inadvertently, could expose our Company and you to civil and criminal liability.

For more information, please refer to our **Information Classification and Handling Policy**.

Audits and Investigations

During your employment with Rimini Street, you may be asked to participate in an audit or internal investigation conducted by our internal auditors, external auditors, Ethics & Compliance, Global Security, HR, or the Legal Department. When this happens, you are always expected to cooperate fully and communicate honestly.

You may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or government investigation. If you receive such a request, you should immediately contact the Legal Department for assistance.

Insider Trading

Insider trading, or the trading of Rimini Street securities while in possession of material, nonpublic information about our Company, is prohibited. You are also prohibited from trading the securities of another company with which Rimini Street does business, such as a Rimini Street supplier or business partner, when you have material, nonpublic information about that company.

Q&As

I just received a litigation hold notice from the Legal Department. Can I just keep printed versions of the documents referenced in the notice?

No. Preserving a printed version of the documents may not suffice because electronic versions often provide information such as track changes and other metadata that may not appear on the printed version of these documents. Emails and electronic versions of documents should be kept if they are relevant to the litigation hold. Follow the instructions set forth in the litigation hold notice and contact the Legal Department if you have questions.

What is “material, nonpublic information”?

In the context of insider trading, information is **material** if a reasonable investor would consider the information important when deciding to buy, sell, or hold that company’s securities. Information is **nonpublic** until it has been widely disclosed, and adequate time has passed for the securities markets to digest the information.

I recently learned that our Company will announce better than expected financial results for this quarter. Is this inside information?

Yes. This kind of financial news can have a positive effect on a company’s stock price and would certainly be considered material nonpublic information or inside information. If you buy Rimini Street securities on the basis of this information before it becomes public, you are engaging in insider trading.

Some examples of material, nonpublic information include:

- Advance notice of changes in senior management.
- Unannounced mergers, acquisitions, or financing transactions.
- Pending or threatened litigation.
- Nonpublic financial results.
- Development of a significant new product.
- An unannounced stock split or other extraordinary transactions.

In addition, we must avoid trading in Rimini Street securities when our Company has imposed internal trading restrictions. If you are advised that you are subject to a trading window or special blackout, do not trade in Rimini Street securities until the restriction has been lifted.

“Tipping” is also a violation of the Code. Tipping occurs when you provide material, nonpublic information about a company to someone else, who then uses that information to trade securities. You should also refrain from discussing material, nonpublic information with other Rimini Street employees unless they have a business need to know. Remember, you may be held liable for violating insider trading laws if you tip, even

if you did not personally make a trade based on the information you provided.

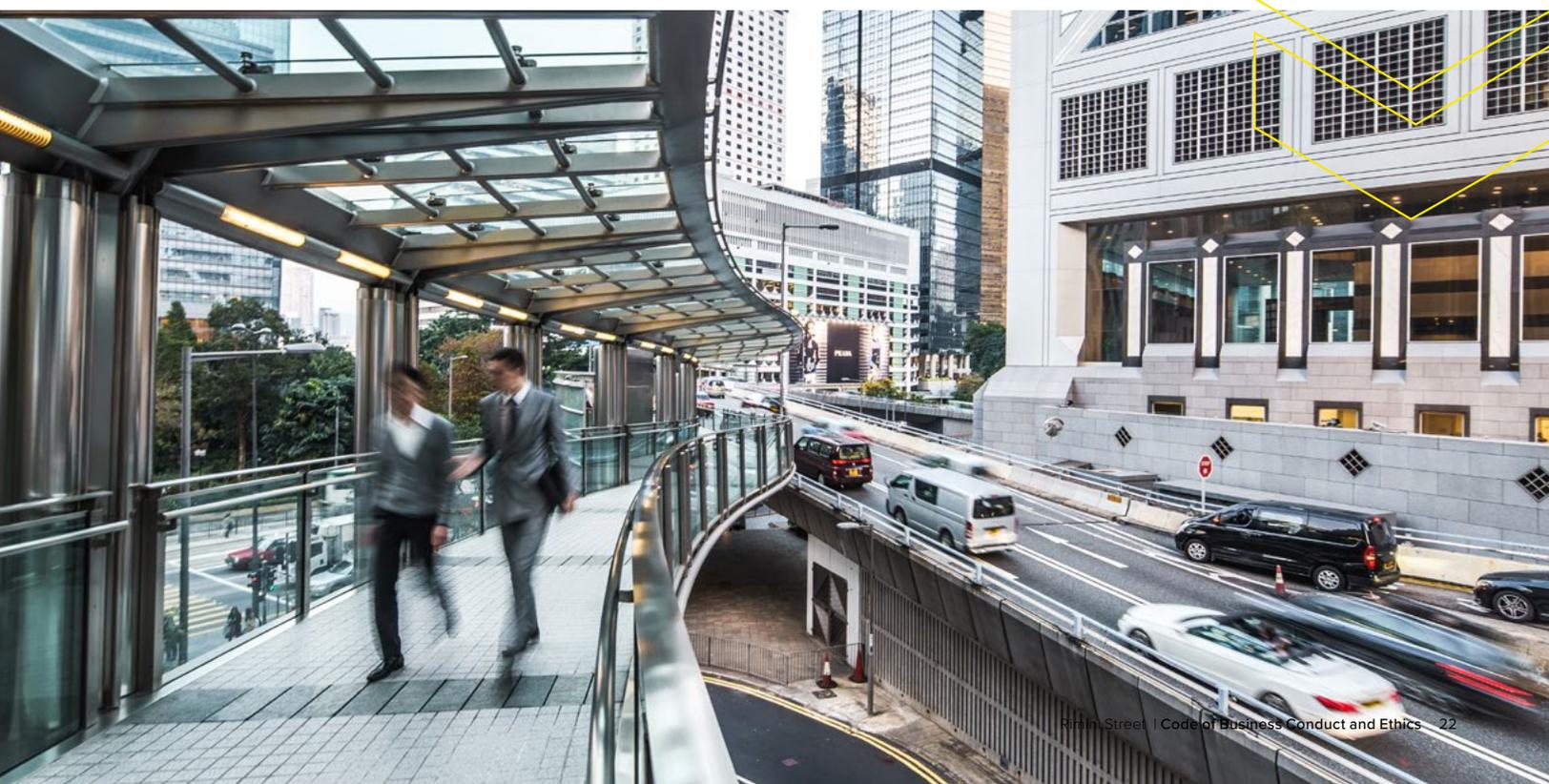
Insider trading and tipping are not only violations of the Code — they are serious violations of securities laws and will expose all individuals involved to immediate termination, as well as civil liability and criminal prosecution. For more information about insider trading, consult Rimini Street’s **Insider Trading Policy**, or contact Ethics & Compliance or the Compliance Helpline.

Media, Analyst, and Public Inquiries

It is important for us to speak on behalf of Rimini Street with one consistent voice. Therefore, only designated Rimini Street spokespersons may make public statements on our Company’s behalf.

If a securities analyst requests information from you, even if the request for information is informal, do not respond to the request unless you are certain you are authorized to do so. Instead, refer that person to our Investor Relations Department. Refer media and industry analyst requests to the Vice President, Global Communications. Requests from all other individuals, including government officials, may be referred to the Legal Department or Ethics & Compliance.

Refer to our **External Communications Policy** for additional details.



Following the Rimini Street Way

In the Global Community

Rimini Street is committed to enhancing the communities we serve around the globe. We provide financial, technological, and volunteer resources to support our communities because they're not just the places where we do business — they're also the places where we live. The following section of the Code, *Following the Rimini Street Way in the Global Community*, describes our commitment to being good corporate citizens and what is expected of all Rimini Street team members in this regard.

Anti-Bribery and Anti-Corruption

Corrupt arrangements with clients, suppliers, government officials, or other third parties are strictly prohibited. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Corruption may involve payments or the exchange of anything of value and includes, but is not limited to, bribery (including bribery of any public or government official, political candidate, or private individual), extortion, and kickbacks.

Corrupt activities are not only a Code violation, they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act ("FCPA") and the United Kingdom's Bribery Act. For more information, consult the *Global Anti-Corruption Policy* or contact Ethics & Compliance. Should you become aware of any actual or potential corrupt payment, arrangement or agreement, report it immediately.



Key Terms

A **kickback** is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given, rebated or kicked back, to the purchaser in exchange for making the deal. For example, a kickback might involve a supplier who offers a Rimini Street employee a monthly payment equaling 5% of Rimini Street's purchases as an inducement to the employee to retain the supplier's services. Kickbacks, like other forms of corruption, are unethical and prohibited under the Code, our policies, and the law.

Remember ...

Corruption may involve the exchange of anything of value. "Anything of value" is very broad and could include goods; services or merchandise, such as cash, cash equivalents, gift cards, vouchers, hospitality, meals, event tickets, retail certificates, entertainment, travel perks, use of vacation homes, airfare or accommodations; special favors or privileges, such as educational, employment, or club membership opportunities for friends and relatives; stock options; donations to designated charities; discounts; personal services; loans; cosigning of a loan or mortgage; or a promise of future employment.

Q&As

A long-time, trusted supplier offered me a commission in exchange for securing an annual contract with Rimini Street for his company. Is there any problem with this?

Yes, in this case, the “commission” for doing business constitutes a kickback, which is unethical and potentially illegal. Let the supplier know that this kind of request violates Rimini Street policy and report the incident to your manager and Ethics & Compliance.

Are there special requirements for charitable donations and sponsorships?

Because charitable donations and sponsorships can pose a corruption risk to Rimini Street, you should refer to the **Global Anti-Corruption Policy** for requirements and guidelines involving charitable donations and sponsorships to government entities or relating to government officials.

Rimini Street is committed to conducting business fairly and legally and opposes all forms of public and private corruption. We comply with anti-bribery and anti-corruption laws and will not offer or pay improper payments or bribes to influence a business decision or gain a business advantage. We will not seek to improperly influence a government decision or gain a business advantage by offering or accepting gifts, entertainment, travel, employment, charitable donations, or other benefits to or from an intermediary. We will not request or accept any bribe, kickback, or improper payment to award a Rimini Street contract or business to a third party. Finally, we maintain internal financial controls to prevent bribery and corruption and keep accurate books and records so as not to disguise bribes or other improper payments as legitimate business expenses.

Laws prohibiting bribery and corruption apply to both government officials and private business persons (known as “commercial bribery”). In some countries, team members or third parties may come under pressure to offer improper payments or bribes to influence business decisions or gain business advantages such as sales, government permits,

or government or private services. Similarly, team members may be offered a bribe or kickback to award a Rimini Street contract or business. Never request, offer, or agree to bribes, kickbacks, or other improper payments. They are illegal in most countries, prohibited by Rimini Street, and can expose you and Rimini Street to criminal prosecution.

Be careful when dealing with government officials. For purposes of our **Global Anti-Corruption Policy** and applicable anti-bribery and anti-corruption laws, a government official is interpreted broadly to encompass a number of different categories. Please consult the Q&A for a detailed set of examples. Subject to a number of narrowly tailored exemptions identified in the **Global Anti-Corruption Policy**, all payments and gifts to, and entertainment of, government officials must be preapproved in writing by Ethics & Compliance. All payments, both direct and indirect, made to government officials must also be accurately recorded in our Company’s books and records. If you are unsure whether you might be dealing with a government official or have any other related questions you should contact Ethics & Compliance for guidance.



Key Terms

Commercial bribery is a form of bribery which involves corrupt dealing with the agents or employees of potential buyers to secure an advantage over business competitors. It is a form of corruption that does not necessarily involve government personnel or facilities.

“Facilitating payments” are improper payments made to a government official or employee to expedite or facilitate a routine government action. It is against Company policy to make facilitating payments unless there is an imminent threat to your or another individual’s health, safety, or welfare. Whenever possible, you must obtain preapproval from Ethics & Compliance and report such a facilitating payment immediately when preapproval is not possible. If you have any question whether a payment qualifies as a facilitating payment, contact Ethics & Compliance.

For more information, consult our **Global Anti-Corruption Policy** or contact Ethics & Compliance. If you become aware of or if you are asked to make an improper payment or bribe or are offered a bribe or kickback to award a Rimini Street contract or business, immediately contact your manager and report the information to Ethics & Compliance or the Compliance Helpline.



Key Terms

A **facilitating payment** is a payment made to a government official or employee to expedite non-discretionary actions or services, such as providing police protection or mail service; processing visa, permit, or licensing applications; or providing utilities like phone service, water and power. These payments are not allowed at Rimini Street.

Q&As

What are examples of a “government official” under our Global Anti-Corruption Policy?

“Government officials” may include:

- All government employees, including employees of regulatory agencies or departments, such as environmental, licensing, tax, and customs
- Any candidate for political office, any political party, or an official of a political party
- Representatives of public international organizations and charities, such as the World Bank, UNICEF, International Red Cross, or the World Health Organization
- Mayors or other local city officials
- Members of law enforcement, including the military, local police, and other enforcement agencies
- Employees of state-owned enterprises, such as purchasing managers of government-run airlines, universities, school systems, hospitals, television stations, utilities (oil, gas, water, and electrical companies), laboratories, defense contractors, or other commercial enterprises that are owned, controlled, or managed by a government
- Members of royal families
- Spouses or immediate family members of any of the foregoing

I was told I could hire a local company to help get all the necessary permits from a foreign government. An advance payment has been requested to “help move the process along.” I have been told this is a common practice in this country. Is it OK for me to make this payment?

No. The request for an advance payment is a potential red flag, and the comment that such payment is intended to “help move the process along” is even more concerning. This advance payment may be considered a facilitating payment, which is not allowed as a matter of Company policy. Consult with Ethics & Compliance before proceeding.

International Trade Controls

As a global company, Rimini Street transfers products, services, and technologies across national borders. Our business transactions are subject to various sanctions, or trade controls and laws, including:

- Government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts.
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the U.S. government.
- Sanctions by different governments around the world that restrict activities with certain countries, entities, or individuals.

Rimini Street is committed to ensuring that these business transactions are accomplished in full compliance with applicable sanctions or trade controls and laws. If you are involved in the transfer of products, services, or technologies across national borders on behalf of our Company or our clients, you must comply with these laws, regardless of where you are located. If U.S. law conflicts with a local trade law, U.S. law may apply. Always consult with Ethics & Compliance for proper guidance on this subject.

Human Rights

Rimini Street recognizes the importance of maintaining and promoting fundamental human rights in our operations around the world. We implement and maintain programs and policies that:

- Promote a workplace free of discrimination and harassment.
- Prohibit child labor, forced labor, and human trafficking.
- Provide fair and equitable wages, benefits, and other conditions of employment in accordance with local laws.
- Provide humane and safe working conditions, including safe housing conditions, where applicable.
- Recognize employees' right to freedom of association and collective bargaining.

We expect our suppliers and business partners to uphold these core principles as well. Always check

your actions to ensure that they do not violate or contradict any of the basic human rights principles noted above. If you suspect a human rights abuse within our operations or supply chain, report it.

Environment

We are committed to engaging in environmentally sound practices. We therefore must meet or exceed the requirements set forth by applicable environmental laws, rules, and regulations that govern our business. We must also continually assess and strive to improve our processes in order to continue our commitment to environmental stewardship. If you know of a practice that is harmful to the environment or does not comply with our Company's policies or with governing laws, rules, and regulations, you have a duty to report it.

Community Support

We make a positive difference in our communities through volunteer work and charitable contributions. While you are always free to make your own personal charitable contributions as you see fit, only authorized Rimini Street personnel and organizations can make donation commitments on behalf of the Company. Rimini Street gives back to our communities by partnering with select nonprofit organizations and through special initiatives, such as in-kind donations, employee time, and financial donations made through the Rimini Street Foundation, which is a program operated by the Company and privately funded by Rimini Street, Inc. You can contact the Rimini Street Foundation for more information.

Political Activities

Employees are encouraged to participate in their local political process in a manner consistent with applicable law and Company guidelines. Your decisions to contribute your own time or money to any political or community activity are entirely personal and voluntary. Employees may make political contributions in their own names. However, you may not use Company funds or resources or receive Company reimbursement for personal political activities, including contributions to political candidates or parties. You should avoid even the appearance of doing so.

Rimini Street obeys all laws in promoting our Company's position relative to government authorities and in making political contributions.

Administering the Code

Rimini Street's Ethics & Compliance Department is accountable for promoting, monitoring, and enforcing the Code. However, the ultimate responsibility for following the Code and for maintaining Rimini Street's culture of compliance rests with each one of us individually. The following section of the Code, *Administering the Code*, describes some key concepts regarding the administration and application of the Code.

Ethics & Compliance Department

You may contact Ethics & Compliance with questions at any time.

- For general inquiries, contact Ethics@riministreet.com.
- Contact the Compliance Helpline for guidance on ethics and compliance matters or to report an actual or suspected violation of the law, the Code, or any Rimini Street policy.
- You can also send a postal mail letter to Rimini Street, Inc., Attn: Ethics & Compliance, 1700 S. Pavilion Center Drive, Suite 330, Las Vegas, Nevada 89135, USA.

Rimini Street Policies and Local Laws

Rimini Street publishes several global policies, which are designed to give employees guidance that is the same for all locations. The Code is an example of a global policy. Rimini Street has also adopted other

internal corporate policies, including country-specific and function-related policies, covering a variety of topics. Because these policies may vary by business unit or market, they are not linked to the Code. You can find all Rimini Street policies on our Company intranet sites. It is your responsibility to know all of the policies that might apply to your areas of the business. If you're not sure about the policies in your area, please talk to your manager, Ethics & Compliance, or the Legal Department.

Rimini Street conducts business in many countries around the world. Our employees are citizens of many countries. As a result, our operations are subject to many different laws, customs, and cultures. Our operations must comply with all applicable local laws and regulations in addition to the Code. In some instances, the laws of two or more countries may conflict, or a local law may conflict with the Code. When you encounter a conflict, contact the Legal Department or Ethics & Compliance for guidance on how to apply the Code in your country.

Remember ...

We are expected to comply with the Code and all laws, rules, and regulations that govern our business around the world. However, if a provision of the Code conflicts with applicable law, the law controls. Because Rimini Street, Inc. is incorporated in the United States, our employees around the world are often subject to U.S. laws. The laws of other countries also may apply to the Company's operations and personnel, whether in the U.S. or in other countries. If you are uncertain what laws apply to you or if you believe there may be a conflict between different applicable laws, consult the Legal Department or Ethics & Compliance before proceeding.



Investigating Misconduct

All reports of suspected violations of the Code or the law will be taken seriously and promptly reviewed. As appropriate, Ethics & Compliance will assign investigator(s) to review all reported instances of alleged Code violations. The investigator(s) will:

- Act objectively in determining facts through interviews or a review of documents.
- Contact employees who may have knowledge about the alleged incident(s).
- Recommend corrective actions and/or disciplinary measures where appropriate.

In accordance with applicable law, Rimini Street strives to:

- Protect the confidentiality of the individuals involved, to the extent practical.
- Inform an employee of the accusations reported against them at a time when such a disclosure will not jeopardize the investigation.
- Where appropriate, allow employees to review and correct information reported.

If asked, you must cooperate fully with an inquiry or investigation.

The Code is Not a Contract

The Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time, nor does it create any contractual or other rights for stockholders, suppliers, or any other person.

Issuance of and Amendments to The Code

The Rimini Street, Inc. Board of Directors is responsible for approving and issuing the Code. The effective date of the Code is November 5, 2019. The Code is reviewed periodically by Ethics & Compliance to determine whether revisions may be required due to changes in the law or regulations, or changes in our business or the business environment. The Board of Directors must approve any amendments to the Code.

Acknowledgement

Each year, Rimini Street distributes the Code to its employees and conducts annual online Code training for all employees. Employees and our Board of Directors are required to acknowledge that they have read and understand the Code. They must also certify their compliance with the Code and disclose any potential conflict of interest or any other possible exception to compliance with the Code. Failure to complete the certification process can be a Code violation and can subject you to disciplinary action and/or impact your performance reviews at the Company's discretion, where permitted by law. In no circumstance does your failure to read the Code, sign an acknowledgement, or certify online exempt you from your obligation to comply with the Code.

Disclosure of Waivers

Any waiver of the Code requires the prior written approval of the Chief Ethics and Compliance Officer or, in certain circumstances, such as in the case of a waiver applicable to an executive officer or member of the Board of Directors, the Board of Directors, or a committee thereof. If required by applicable law, waivers will be promptly disclosed as required by applicable law, including on a publicly available current report filed with the SEC or on the Company's website.



Remember ...

We acknowledge periodically our commitment to the principles set forth in the Code. This acknowledgment includes a commitment to seek guidance in the event of uncertainty. We also affirm that we will not retaliate against anyone for reporting a concern or seeking guidance.

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Resources and Contact Information

The Rimini Street Compliance Helpline

Telephone: In the United States, call **844-754-3342**. For a list of international country phone numbers, see our Compliance Helpline section at www.riministreet.com/company/ethics-and-compliance.

Web reporting: <https://riministreet.i-sight.com/portal>

Ethics & Compliance Department

Rimini Street, Inc.
Attn: Ethics and Compliance
1700 S. Pavilion Center Drive
Suite 330
Las Vegas, Nevada 89135, USA.

Legal Department

Legal@riministreet.com

Global Communications Department

PR@riministreet.com

Global Security Department

Security@riministreet.com

Human Resources Department

Contact your local HR manager or business partner, or see the Company intranet for a complete list of HR contacts.

Investor Relations

IR@riministreet.com

Corporate Policies and Procedures

[Antitrust Compliance Policy](#)

[Corporate Governance Guidelines](#)

[External Communications Policy](#)

[Global Anti-Corruption Policy](#)

[Global Business Courtesies Policy](#)

[Insider Trading Policy](#)

[Policy Regarding Reporting of Accounting, Auditing and Other Matters](#)

[Supplier Code of Business Conduct and Ethics](#)

For a complete listing of Rimini Street policies and procedures, please refer to the Company