

Rimini Street, Inc.

Supplier Code of Business Conduct and Ethics

Introduction

Rimini Street, Inc., including its subsidiaries and controlled affiliates (collectively, “Rimini Street”), is committed to the highest standards of ethics and business conduct. As stated in our *Code of Business Conduct and Ethics*, Rimini Street employees are expected to keep integrity at the heart of our culture by complying with the ethical and legal standards that govern our business conduct.

As a Rimini Street supplier, vendor or contractor, you are an important part of our business, and we expect you, your employees, agents and subcontractors (collectively, “Suppliers”) to share our commitment to acting with integrity. This *Supplier Code of Business Conduct and Ethics* (the “Supplier Code”) outlines Rimini Street’s standards and expectations with respect to business conduct while you work with or on behalf of Rimini Street. You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Supplier Code.

Compliance with Laws and Contractual Requirements

We expect our Suppliers to operate in full compliance with the applicable laws, rules, regulations, court orders, and ethical standards of the countries in which you operate or where you provide products, people or services to or for Rimini Street. If the standards or requirements set forth in this Supplier Code are more restrictive than applicable law, then you must follow the more restrictive standards or requirements.

Suppliers must also comply with contractual requirements, including those contractual requirements that may be contained in agreements between you and Rimini Street. The Supplier Code provides guidelines for business conduct but does not replace the specific requirements in Supplier contracts. Similarly, the Supplier Code does not alter contractual terms or constitute express or implied contractual obligations or contracts of employment.

Rimini Street understands and expects that our Suppliers will have their own internal codes of conduct and compliance policies and procedures. Your own written ethics and compliance standards may replace this Supplier Code if they are consistent with this Supplier Code and are incorporated into a written agreement between you and Rimini Street.

Business Integrity

Honesty, integrity, and transparency in business operations provide the foundation for our business relationships. Suppliers must commit to the highest standards of integrity and ethical business practices.

Conflicts of Interest

Suppliers must avoid relationships with any Rimini Street employee that affect or might appear to affect the objectivity of the employee’s judgment or that creates or appears to create a conflict of interest for that employee. To avoid conflicts of interest or the appearance of impropriety:

- In the course of negotiating a Supplier agreement or performing your obligations to Rimini Street, Suppliers must not deal directly with any Rimini Street employee who holds – or whose spouse, domestic partner or other family member or relative holds – a significant financial interest in the Supplier.

- Suppliers must not offer any goods, services, business opportunities, commissions or advantageous financial arrangements that would personally benefit a Rimini Street employee.
- The key to addressing conflicts of interest is prompt and full disclosure, and Suppliers are expected to report any actual or potential conflict of interest – for example, family or close personal relationships with Rimini Street employees, joint business interests with Rimini Street employees, and similar relationships or arrangements – as soon as you become aware of the situation. Such disclosures may be made by contacting Rimini Street’s Ethics & Compliance Department (“Ethics & Compliance”) or the Rimini Street Compliance Helpline as described in the “Seeking Guidance and Reporting Concerns” section below.

Business Courtesies – Gifts, Meals, Entertainment

Suppliers may not offer or accept business courtesies – gifts, meals, entertainment, or other hospitality – that might influence, or appear to influence, the decision making of Rimini Street employees. In this regard, please note the following:

- It is important to understand the applicable laws, regulations and rules regarding business courtesies and to avoid even the appearance of improper conduct between Rimini Street and our Suppliers. Business courtesies must comply with all applicable laws and regulations and 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 create the appearance of impropriety.
- In general, Rimini Street does not believe in offering gifts to or accepting gifts from third parties due to risks of an appearance of improper conduct, and it is easiest to simply not engage in such exchanges. Gifts include anything of value provided for personal use or benefit for which the recipient does not pay fair market value. In those limited circumstances where gifts are exchanged with Rimini Street employees, such gifts must comply with all applicable laws and regulations and must be reasonable in value. To be considered “reasonable in value, a single gift given to an individual recipient must have a value of \$100 USD or less, and multiple gifts given to an individual recipient over the course of 12 months must have an aggregate value of \$300 USD or less. The exchange of single gifts greater than \$100 USD, or multiple gifts in a 12-month period totaling greater than \$300 USD, must be pre-approved by Ethics & Compliance. Offering cash or cash-equivalent gratuities (such as gift cards, gift certificates or vouchers) to any Rimini Street employee is not allowed regardless of value. Gifts that violate our policies, or that are otherwise determined to be inappropriate, will be returned to the Supplier or handled in a manner that complies with our internal policies.
- Business meals, entertainment, and other hospitality must serve a legitimate business purpose, must be reasonable in value, and must not occur on a frequent or routine basis.
- Suppliers must not provide any gifts, meals, entertainment, or other hospitality – regardless of value – to any government official for or on behalf of Rimini Street without the prior express written authorization of Ethics & Compliance. Similarly, Suppliers must not make any direct or indirect political contribution or expenditure for or on behalf of Rimini Street.
- Rimini Street employees may not solicit business courtesies from our Suppliers. If a Rimini Street employee asks you for a gift, meal, entertainment, or other hospitality, or if you have questions about Rimini Street’s expectations about business courtesies, contact Ethics & Compliance or the Compliance Helpline.

Bribery and Corruption

Suppliers must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and any applicable equivalent non-U.S. law. Suppliers may not offer,

promise, give, or accept anything of value to any public or government official, political candidate, or private individual in order to obtain improper advantages to anyone for any reason. Suppliers are further prohibited from engaging in any other forms of bribery, kickback, corruption, extortion, or embezzlement, including making expediting or facilitating payments. Suppliers are responsible for implementing procedures to ensure compliance with applicable anti-bribery and anti-corruption laws, including overseeing the conduct of your employees, agents and subcontractors.

International Trade Controls

Rimini Street is committed to ensuring that all business transactions are accomplished in full compliance with applicable laws and international trade controls. Suppliers must comply with all applicable government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts. Suppliers that import or export goods, software or technology must comply with all legal requirements, including those that require you to obtain import and export licenses when shipping controlled items.

Antitrust and Fair Competition

Suppliers must conduct business in full compliance with antitrust and fair competition laws. Suppliers must avoid any business practices aimed at limiting or impairing full and open competition for the products or services you provide to Rimini Street. Suppliers must not offer our employees any confidential information about a competitor of Rimini Street.

Insider Trading

As a Rimini Street Supplier, you may be given access to material, nonpublic information about Rimini Street or third parties. Suppliers must avoid insider trading by not buying or selling the securities of Rimini Street or another company when in possession of information that is not available to the investing public and that could influence an investor's decision to buy, sell or hold such securities. Suppliers also must not provide nonpublic information about Rimini Street or third parties to another person, including when that information could influence an investor's decision to buy, sell or hold securities.

Confidentiality, Data Privacy and Information Security

Suppliers must protect the personal and/or confidential information they maintain on behalf of Rimini Street from unauthorized access, destruction, use, modification, and disclosure. Suppliers must also comply with all applicable data privacy and information security laws and regulations regarding the collection, use, maintenance, transfer, sharing, disclosure, and disposal of personal and/or confidential information. In addition, Suppliers must comply with other contractual obligations related to data privacy and information security.

Nothing in this obligation of confidentiality or elsewhere prohibits you from raising concerns about violations of the Supplier Code or the law either during or after your engagement with Rimini Street. Further, nothing in this obligation of confidentiality or any other Rimini Street policy or agreement restricts your ability, either during or after your engagement with Rimini Street, to communicate with government agencies about possible violations of the Supplier Code or applicable law, provide information to government agencies, file a complaint with government agencies, or participate in government agency investigations or proceedings.

Intellectual Property

Rimini Street's intellectual property, or IP, is an important asset that must be protected at all times. Suppliers must never allow a third party to use our IP without proper authorization and a license agreement that has been approved by the Rimini Street Legal Department. In addition to protecting Rimini Street's IP, we also expect our Suppliers to respect the IP rights of others. You have a duty to

ensure that you obtain appropriate rights to access or use third-party IP. You must also avoid infringement of any third party's patents, trademarks, copyrights, and trade secrets.

Accurate Books and Records

Suppliers must maintain accurate books and records in compliance with all applicable laws, regulations, generally accepted accounting practices, and your contractual obligations with Rimini Street. Business records must be timely, accurate, truthful and complete.

Social and Working Conditions

Rimini Street is committed to treating people fairly, with respect, and in accordance with applicable laws and regulations. We expect our Suppliers to share this commitment and adhere to the standards regarding social and working conditions outlined below.

Harassment and Discrimination

Suppliers must promote a work environment free from verbal, physical, or mental abuse, threats, violence, or any form of harassment during employment or recruitment. Similarly, Suppliers must not engage in unlawful discrimination in hiring and employment practices such as promotions, rewards and access to training. Employees must not be subject to discrimination based on, but not limited to, 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.

Health and Safety

Rimini Street is committed to the prevention of workplace injuries and illnesses, and to compliance with applicable laws and company policies related to employee health and safety. Suppliers must also comply with applicable health and safety laws and regulations and promote safe and healthy workplaces to reduce the risk of accidents, injuries, and exposure. We encourage Suppliers to implement and have in place a performance monitoring program to account for aspects of their health and safety programs.

Hiring and Termination

Suppliers must comply with applicable laws governing eligibility for employment, recruitment, and termination. Suppliers must not knowingly employ individuals who are not authorized to work, as determined by governing law.

Child Labor

Suppliers must comply with the minimum age requirements as prescribed by applicable laws and regulations. Suppliers must adhere to our contracts or other applicable supplemental guidelines which may provide standards at a higher level. Suppliers must not interfere with a child's education by employing a child in violation of a country's compulsory education laws. Supplier may use legitimate, voluntary workplace apprenticeship programs, such as student internships, as long as they comply with all laws and regulations. Workers under the age of 18 must not be asked or required to perform work that is likely to jeopardize their health, safety or well-being.

Forced Labor

Suppliers must use only voluntary labor. Any form of forced labor, including bonded, indentured, or involuntary prison labor is prohibited. Human trafficking and trafficking-related activities are also prohibited, including using misleading or fraudulent recruitment practices, charging recruitment fees,

denying employee access to their identity documents, failing to provide return transportation costs or an employment agreement (if required) in the employee's native language.

Wages, Benefits, and Working Hours

Suppliers must comply with all applicable laws governing wages, benefits, and working hour requirements, including compensation, benefits, and overtime. Accurate written records of employees' regular and overtime hours should be maintained.

Freedom of Association

Suppliers should respect employees' right to freedom of association including the right to collectively bargain, consistent with local laws and ensure that all employee relationships are of a voluntary nature. Employees must not be subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.

Environment and Sustainability

Rimini Street is committed to environmental responsibility and sustainable business practices. We are also committed to complying with applicable environmental laws and regulations, reducing the environmental impact of our business operations, and promoting the sustainability of the natural resources on which we depend.

We expect our Suppliers to comply with all applicable environmental laws and regulations. We encourage Suppliers to take into account the environmental impact in business decision-making and consider opportunities for conservation of natural resources, recycling, reuse, source reduction, and pollution prevention and control. We also encourage Suppliers to implement and have in place a performance monitoring program to account for aspects of their environmental programs.

Monitoring and Assessment

Rimini Street expects our Suppliers to have controls and processes in place that are designed to facilitate compliance with the law and this Supplier Code. In that regard:

- Suppliers are expected to promptly report any identified or suspected violations of the law or this Supplier Code to Rimini Street. Reports may be made through the Rimini Street Compliance Helpline as described below in "Seeking Guidance and Reporting Concerns." Rimini Street will not tolerate retaliation against any individual who reports violations 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.
- We also encourage you to provide an anonymous compliant mechanism for your employees, agents and subcontractors to report violations of this Supplier Code. Suppliers must take reasonable measures to ensure confidentiality and anonymity, unless prohibited by law. Suppliers must also protect any individual who reports violations in good faith from retaliation.
- Suppliers must provide reasonable assistance in connection with any investigation by Rimini Street of an actual or suspected violation of the law or this Supplier Code.
- We expect our Suppliers to self-monitor and demonstrate compliance with this Supplier Code. Identified deficiencies must be timely corrected.

Rimini Street may conduct periodic supplier performance reviews, assessments, and on-site visits. Falsification of records or misrepresentation of conditions or practices in Supplier's operations is unacceptable.

Our goal is to work with Suppliers to assure compliance with this Supplier Code, and we will inform Suppliers of instances of actual or suspect non-compliance when we learn of them. Suppliers must take corrective actions to address non-compliance and keep us informed of their remediation efforts. We take a continuous improvement approach and work with Suppliers to improve their practices.

We take this Supplier Code seriously, and any violations may jeopardize your business relationship with Rimini Street. Subject to existing contractual obligations, Rimini Street reserves any and all contractual rights to halt business with Suppliers if remediation or abatement efforts to achieve compliance are not effective or timely.

Seeking Guidance and Reporting Concerns

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

You can ask questions, raise concerns or make reports of suspected compliance violations by contacting the Rimini Street Compliance Helpline:

- 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
- By web available at www.RiminiStreet-ComplianceHelpline.com

The Rimini Street Compliance Helpline is managed by an outside company and is available 24 hours a day, seven days a week. Where allowed by local law, you may make an anonymous report to the Compliance Helpline.

You may also ask questions and report concerns by contacting Rimini Street's Ethics & Compliance Department by emailing ethics@riministreet.com.

Policy adopted and effective as of November 5, 2019