



Red Hat Partner Code of Conduct

At Red Hat, we believe it is essential to act ethically and in accordance with the laws of the countries in which we do business. We rely on our Partners to help us maintain the trust of our customers and broader community and, therefore, only work with Partners who we believe are honest and ethical, and who commit to do business ethically.

This Partner Code of Conduct (the “Code”) is intended to protect the value of our business together and the strength of our collective reputations, and was created with the following core values in mind:

FREEDOM to pursue appropriate business opportunities

COURAGE to take action in the face of illegal or unethical behavior

COMMITMENT to legal and ethical business conduct

ACCOUNTABILITY for all our actions

This Code applies to all Red Hat Partners and their officers, directors, employees, independent contractors, and agents (“Partners”). We take ethics, integrity and compliance with laws seriously and expect all Partners to adhere to this Code when conducting business with Red Hat and its customers, potential customers and other Partners. Without limiting other rights and remedies that we may have under agreements with our Partners, if Red Hat believes that a Partner has failed or may fail to comply with this Code, Red Hat may immediately suspend or terminate its relationship with the Partner.

Compliance with Laws and Regulations Generally

Red Hat expects its Partners to comply with all laws that apply to the conduct of their businesses and their relationships with Red Hat, including laws relating to anti-corruption, public procurement, antitrust and competition, export, employment, data privacy, anti-discrimination, health and safety.

Anti-Corruption Laws

Partners must comply with all applicable anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act. This means, among other things, that Partners must not pay or accept payment of bribes or kickbacks or otherwise seek to improperly influence any act or decision of a governmental official, employee or political candidate including by offering, paying or authorizing any direct or indirect payments or anything of value for the purpose of improperly obtaining or retaining business or other advantages.



Gifts and Entertainment

Partners must ensure that all business amenities provided to customers and others comply with applicable laws, rules and requirements (including internal policies of the recipient's employer). Gifts, entertainment, travel and other favors must never be used to influence judgment, obtain unfair preferential treatment, or gain improper advantage.

Preserving Fair Competition

Partners must comply with all applicable antitrust and competition laws. These laws vary from country to country but we expect that Partners will not engage in conduct that unreasonably restrains trade or is deceptive or misleading.

Maintaining Financial Integrity

Partners must maintain their financial books, records and accounts in accordance with applicable legal, regulatory and accounting requirements, and in a manner that accurately reflects the true nature of the transactions they record. You must provide complete and accurate information in all your submissions to Red Hat.

Avoiding Insider Trading

As a Partner, it is possible that you may obtain material, non-public information about Red Hat, its affiliates or other companies. You must use this information only for the purpose for which it was provided to you. Using such information for other purposes, such as to trade in securities or to share the information to allow others to trade in securities, is improper and constitutes a violation of this Code.

Preventing Conflicts of Interest

Fairness and honesty in dealings requires the ability to act free of any improper influence or distraction. If the ability to act with objectivity is compromised, there may be a conflict of interest. Red Hat requires its Partners to avoid any situations in which objectivity or the ability to conduct business honestly and ethically may be compromised. If a Partner is faced with a conflict of interest or a situation that could create the appearance of a conflict of interest in connection with Red Hat business, Red Hat expects the Partner to disclose the conflict to Red Hat.

Training and Compliance

With respect to a Partner's officers, directors, employees, subcontractors and agents who may be involved directly or indirectly in Red Hat business ("Partner Representatives"), Partners are expected to (1) ensure that their Partner Representatives are aware of and comply with this Code and (2) provide regular training intended to ensure that their Partner Representatives



understand the issues described in this Code and comply with its terms. Red Hat may periodically review your compliance with this Code and ask you to certify that you have done so.

Let us Know if Something may be Wrong

Working together to address potentially problematic behavior is essential to ensure both Red Hat's and its Partners' future success. Please contact us immediately if you become aware of any unlawful or unethical situation involving or related to the sale of Red Hat products or services.

You may contact us at Red Hat, Inc. 100 East Davie Street, Raleigh, NC 27601, Attention: General Counsel or legal-notices@redhat.com.