

# Delivering Excellence

DXC's Code of Conduct



Committing to our  
values and our Code to  
make a positive impact  
across the globe

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The Code is our guide to delivering excellence with integrity for those who depend on us.

# OUR **VALUES** GUIDE **CHOICES** AND INSPIRE **BEHAVIORS** THAT DELIVER **EXCELLENCE**

DXC Technology is an IT services company that uses the power of technology to build better futures for our customers, colleagues, communities and the environment. To achieve our purpose, we foster a positive, inclusive and supportive culture defined by our values.

We believe the following five values best express **who we are**, **what we stand for** and **how we show up** for our customers, colleagues and communities.



## **Deliver**

We do what we say we are going to do.



## **Care**

We take care of each other and foster a culture of inclusion and belonging.



## **Do the right thing**

We act with integrity.



## **Collaborate**

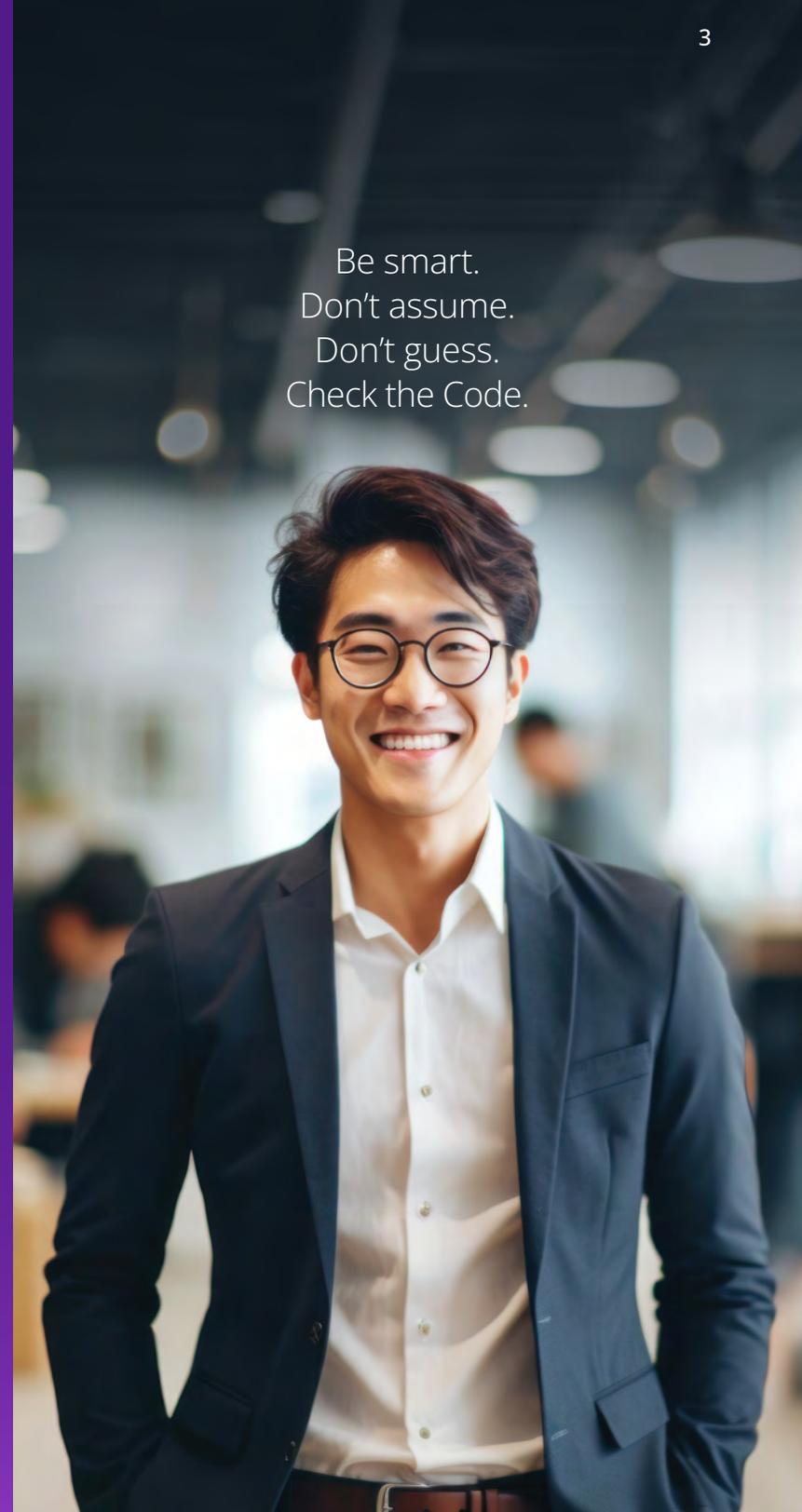
We work as a team — globally and locally.



## **Community**

We believe in stewardship and building a sustainable company that supports our communities.

Our values are integrated throughout **Delivering Excellence: DXC’s Code of Conduct**. Together with our purpose, the values inform our goals and point us to our destination. The Code helps us get there, navigating complexity, uncertainty or potential risk along the way.



Be smart.  
Don't assume.  
Don't guess.  
Check the Code.



“Our Code of Conduct helps us connect our values with the decision making and behaviors that will grow trust and reduce risk.”

— Raul Fernandez



## Message from our president and CEO

Dear colleagues,

We can feel inspired and proud to work for a company that uses the power of technology to build better futures for our customers, colleagues, communities and the environment.

By focusing on how we pursue our purpose as well as what we do, we strengthen our culture, relationships and reputation. By growing trust, we will grow DXC in ways that make our business sustainable, resilient and admired.

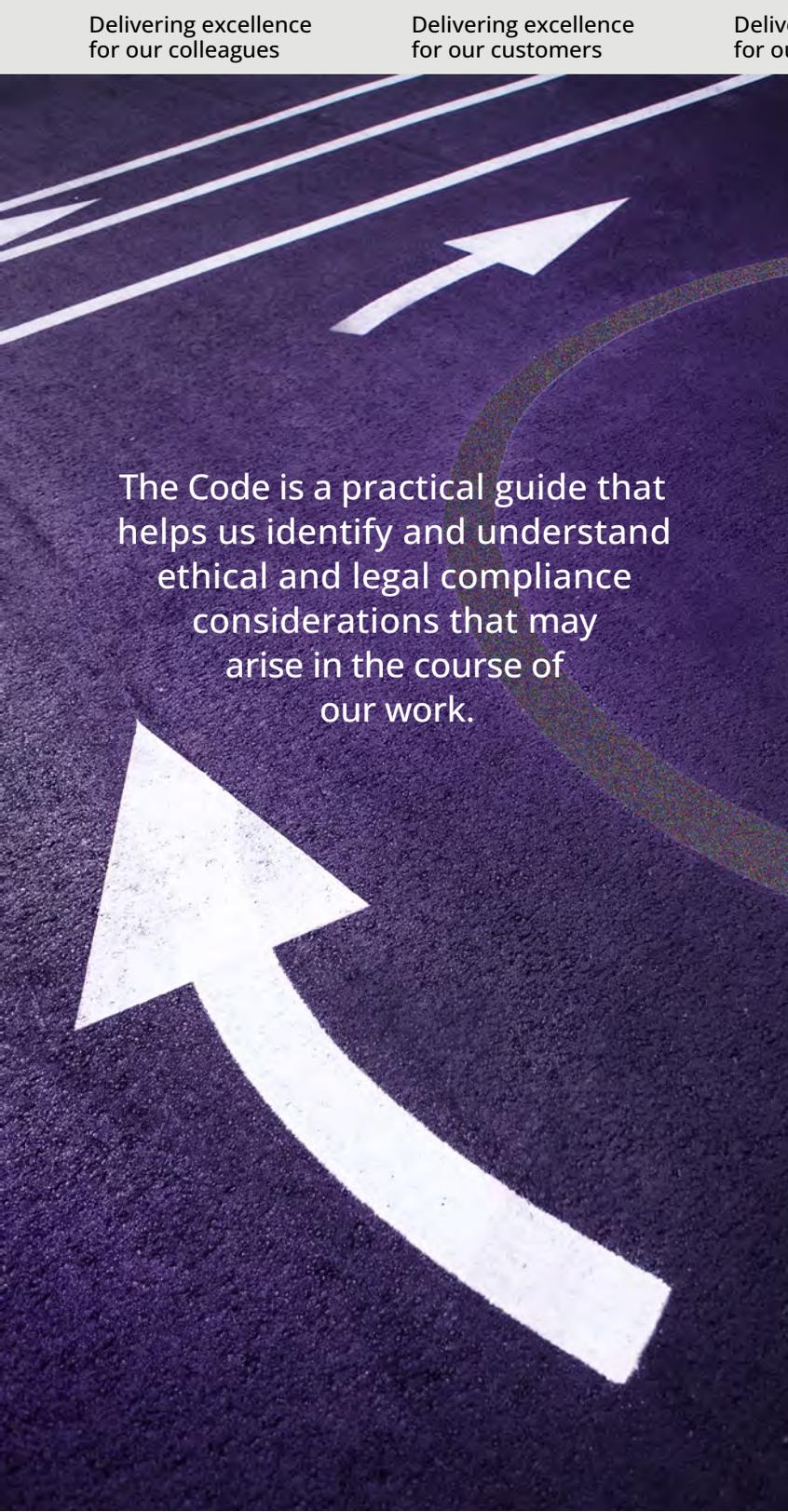
Our Code of Conduct helps us connect our values with the decision making and behaviors that will grow trust and reduce risk. We must all be familiar with and follow the Code and speak up whenever we have a question or concern. Please commit to doing this, connect the Code with what you do every day, and put it into practice to deliver excellence for our customers and colleagues.

Sincerely,

**Raul Fernandez**

President and Chief Executive Officer

DXC Technology



The Code is a practical guide that helps us identify and understand ethical and legal compliance considerations that may arise in the course of our work.

## No excellence without integrity

### Why the Code matters

At DXC, we deliver excellence for our customers and colleagues. Excellence means being truly the best — not only at what we do, but also at how we do it. The way in which we accomplish our goals is as important as whether we accomplish them; understanding this helps us do the right thing.

A goal achieved the wrong way — by disregarding our values, legal obligations or ethical principles — is not really achieved at all. In fact, it undermines everything we stand for. We can claim to be excellent only if our decisions and actions — as well as the product of our work — are beyond reproach. That's why knowing and following our Code is so important.

### How the Code is organized to help us

The Code is a practical guide that helps us identify and understand ethical and legal compliance considerations that may arise in our work. The Code cannot anticipate or explain every situation, but it highlights key commitments and expectations, as well as areas of potential risk that require special care.

For consistency and ease of use, each topic in this guide is structured as follows:

- COMMIT** A brief, memorable statement of principle indicating the standard to which we hold ourselves in the relevant area
- CONNECT** Three short paragraphs that connect the Code's expectations and requirements to DXC's **values and culture**, our **customers and business**, and building **trust and reputation** — establishing the everyday relevance and importance of the Code
- DELIVER** A list of key actions that help us put our values into practice and deliver excellence with integrity

### Who the Code applies to

The Code applies globally to all directors, officers, executives, employees and representatives of DXC, its wholly owned subsidiaries and their affiliates, subject to applicable laws and regulations. It also applies in certain respects to business partners, such as suppliers, contractors, consultants, representatives and agents. We are all expected to be familiar with and follow the Code. A violation of the Code is a serious matter that may result in disciplinary action.

### Waivers and amendments

In rare circumstances, to avoid unintended consequences or hardship, we may consider a waiver of a requirement of the Code. DXC's vice president and chief ethics and compliance officer may grant a waiver to a DXC employee, other than an executive officer. Any waiver or modification of this Code for an executive officer or member of the Board of Directors (Board) must be approved by DXC's Board and promptly disclosed, as may be required by laws and regulations, including the rules of the New York Stock Exchange (NYSE) and U.S. Securities and Exchange Commission. Any material amendment of this Code must be approved by the Board.

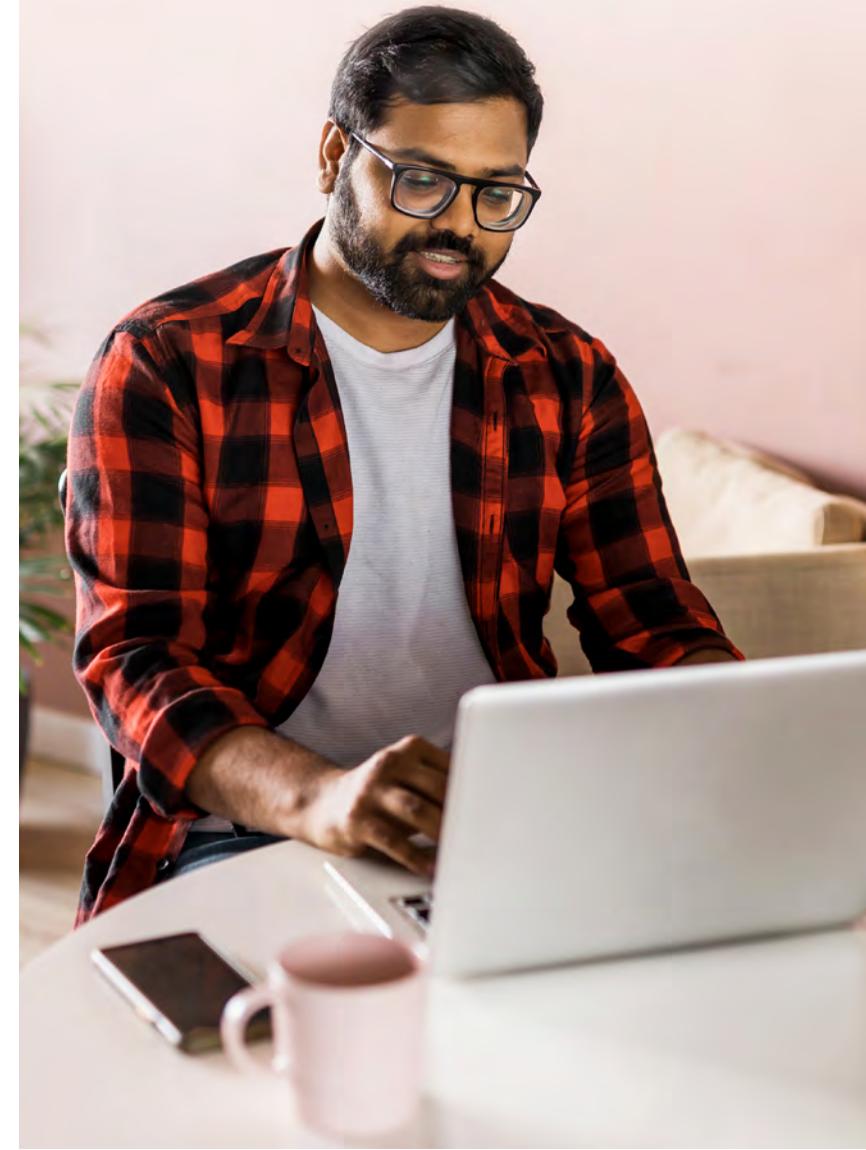
## Everyone. Everywhere. Every day.

At DXC, we strive for growth: growing ourselves, our teams, our customers and our company. We know that growth is sustainable only if we achieve it the right way, consistent with our values, the Code and the law. Making sure we do this is a shared responsibility, regardless of our role, seniority or location.

We fulfill this shared responsibility when we:

- **Embrace and exemplify DXC's values.** Our values guide our decisions and actions; they may not give us all the answers we need, but they help us ask the right questions to identify ethical issues and seek help.
- **Know and use the Code.** The Code is much more than an introduction for new hires and an annual refresher for everyone else. It provides essential information and resources relevant to our everyday work. We should consult it as needed.
- **Are open and inclusive.** We discover opportunities for collaboration and growth when we are receptive to others' ideas and perspectives. An open and inclusive mindset injects fresh energy and rigor into our thinking, which benefits us all.
- **Resist pressure to do anything that feels wrong.** No one has the authority to make any of us do something that violates this Code.
- **Invest in learning and skills development.** We all have an obligation to maintain the knowledge and skills necessary to perform with excellence. This includes timely completion of required training.
- **Speak up with ideas, questions and concerns.** Any of us can have a great idea that can make things better for our company or customers. Asking questions promotes alignment and collaboration. When we see or suspect anything that raises a concern, speaking up is the right thing to do.

We all have an obligation  
to maintain the knowledge  
and skills necessary to  
perform with excellence.



Our success and growth  
depend on the trust we  
build together.



## Leading with integrity

Leaders have a special responsibility to care for DXC's culture and values. Leaders should promote an inclusive and collaborative work environment for our teams.

As a leader or manager, the way you make decisions and handle concerns, differences of opinion and even bad news sets the foundation for trust with your teams, customers and stakeholders. Our success and growth depend on the trust we build together.

We have an impact that matters when we:

- **Communicate integrity.** Regularly communicate that how we do things matters as much as what we do. Be clear that DXC's values are important and that you expect work to be done ethically.
- **Model ethical leadership.** Anyone, at any level, can demonstrate ethical leadership through their decision making and actions. When you have a formal leadership role, remember that your teams will constantly look to you for ethical cues and guidance.
- **Ask questions.** Remind your teams regularly of the importance of doing the right thing; tell them that for results to matter, they must be achieved the right way. Asking questions will help to satisfy you that everyone is operating with integrity.
- **Look and listen.** As a leader, it is critical that you coach and care for your teams. Make sure they know you will listen, even if they have something difficult to say. Look for and respond to signs that team members need support.

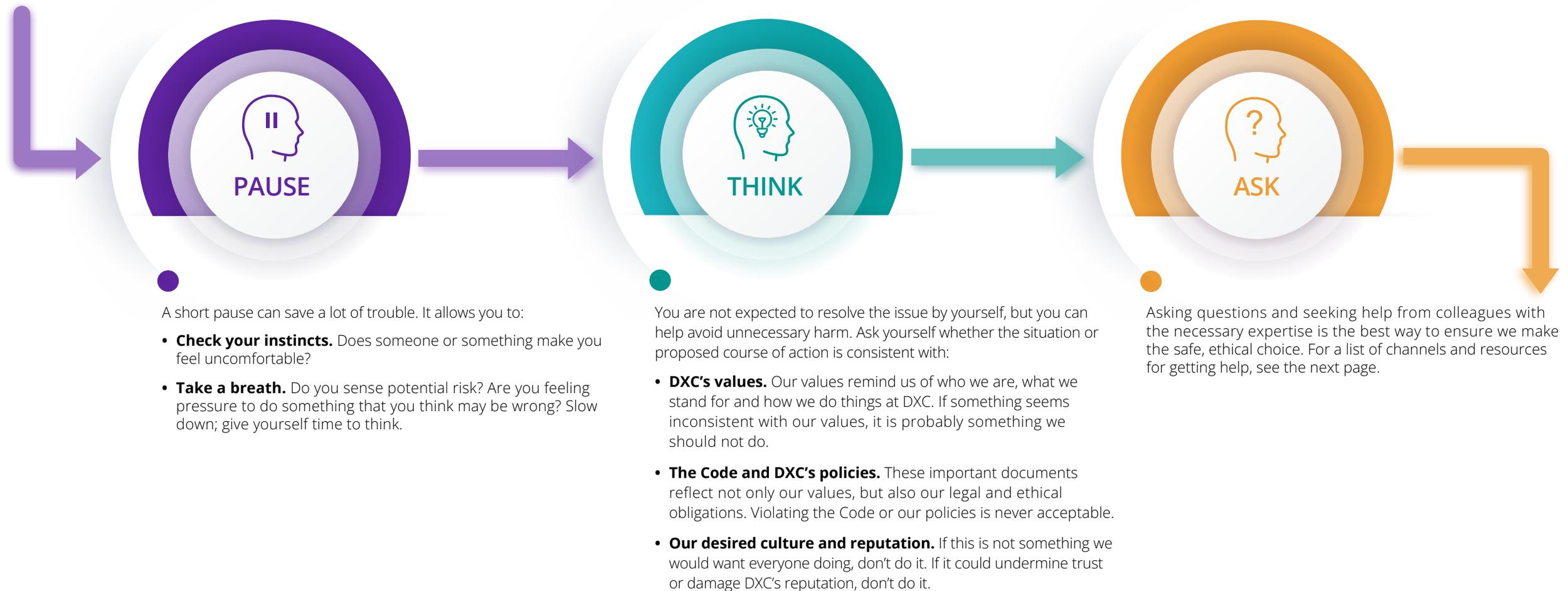
## Choose integrity

### Doing the right thing is a choice — and we always have a choice.

Striving for excellence isn't always easy. Situations can be complex, risks may not be obvious, and we may be balancing competing interests.

One thing is always clear, however: If we are concerned about a situation or unsure about the right course of action, we must set ourselves up to make the right choice.

It can help if we take three simple steps: **Pause. Think. Ask.**



Speaking up is how  
we keep ourselves  
accountable for living our  
values and maintaining a  
strong ethical culture.

## Speak up, DXC!

At DXC, we are all empowered to speak up — with ideas, questions and concerns. Doing so benefits our business and work environment in several ways.

As a company committed to innovation and continuous improvement, we encourage everyone to **share ideas** on how we can do things better or deliver excellence for our customers and colleagues in new and improved ways.

When we **ask questions**, we promote the clarity and alignment needed to collaborate effectively. Questions can also reveal perspectives and opportunities that we might otherwise have missed.

When colleagues **raise concerns**, it allows us to proactively identify and manage risks, avoid or address problems, and prevent situations from escalating. Most importantly, speaking up is how we keep ourselves accountable for living our values and maintaining a strong ethical culture.

Speaking up is ...

### Easy

Anytime you have a question or concern or face a situation where the course of action is not clear, speaking with your direct supervisor is usually the best first step. If you are uncomfortable doing so or if the issue involves your supervisor, other reporting options include:

- Your supervisor's manager
- [SpeakUp Line](#)
- [SpeakUp mailbox](#)
- Human Resources
- DXC Response Operations Center (DROC)
- DXC Legal

Speaking up is ...

### Safe

Anonymous reporting is available via the SpeakUp Line, where allowed by local law.

**DXC has zero tolerance for retaliation** in any form. It is prohibited by the Abusive Conduct & Harassment Policy.

DXC will take **disciplinary action**, up to and including dismissal, against anyone found to have engaged in or tolerated retaliation.

Speak up. It's the right thing to do.



#### Resources:

[Case Management & Investigations Policy](#)

[Global Whistleblowing Policy](#)

# Delivering excellence for our colleagues

builds a caring culture of collaboration and trust  
in which we can succeed together.

## **Respect and encourage each other**

We treat others as we wish to be treated, so that we can be ourselves and give our best effort.

## **Value our diverse contributions**

Our different talents, backgrounds and perspectives make us stronger, smarter and more creative together.

## **Nurture talent**

We give everyone a fair chance to succeed and grow, based on their merits, performance and potential.

## **Promote wellness at work**

We prioritize our physical and mental well-being so we can all perform at our best.

## **Safeguard personal data**

We protect the privacy of our personal data by sharing it only with those who have a business need or legal right to receive it.

# Leading by example

I have noticed that our project team leader regularly compliments my colleague's hair, clothing or jewelry. My colleague confirmed to me in private that the attention was unwelcome and embarrassing, but she had decided to ignore it. The team leader then pinged her, noting that they lived only 20 miles apart and should get together in person for the first time. Being new and relatively junior, my colleague is reluctant to complain about the leader; she thinks he will eventually lose interest. I don't think she should have to tolerate this. I don't want to do anything against her will. What should I do?



If the attention from the project team leader is unwelcome and embarrassing, it can be harassment and is unacceptable. We do not tolerate harassment or abusive conduct. If your colleague is comfortable doing so, she should tell the project team leader that she is uncomfortable with his conduct. Alternatively, she can report the matter to her manager, HR, Legal or DXC Integrity. If she is reluctant to act, then you have a responsibility to address the conduct — either with the project team leader directly (based on what you have noticed) or by reporting the matter yourself.

## Respect and encourage each other

**COMMIT** We treat others as we wish to be treated, so that we can be ourselves and give our best effort.

**CONNECT** Values and culture

Our Care value reminds us to be caring and inclusive. This helps create a positive and supportive culture that empowers excellence.

### Customers and business

Positive interactions with colleagues translate into great customer service and experiences.

### Trust and reputation

Treating colleagues and customers well builds trust and promotes collaboration; it also enhances DXC's reputation as an employer of choice.

**DELIVER** We deliver excellence when we:

- Listen well and assume positive intent
- Consider how others might perceive our words and actions
- Never mock or belittle others based on race, color, age, sex or any other characteristic protected by law
- Don't tolerate degrading or intimidating behavior
- Watch for signs that others are being harassed or bullied



### Resources:

Abusive Conduct & Harassment Policy

Global Diversity and Non-Discrimination Policy

## Zero tolerance

**DXC has zero tolerance for harassment and abusive conduct or bullying.**

We can prevent harassment by treating others with dignity and respect. We use care in our interactions and avoid behavior that creates an intimidating, offensive or hostile work environment.

Harassing behavior and language can include:

- Offensive images or comments, such as suggestive pictures, racial slurs or religious jokes
- Aggressive pressure and intimidation, whether verbal, physical or visual
- Sexual harassment, such as unwanted sexual advances, unwanted touching, crude remarks or offering of employment-related favors in exchange for sexual contact

## Value our diverse contributions

**COMMIT** Our different talents, backgrounds and perspectives make us stronger, smarter and more creative together.

### CONNECT Values and culture

Our Care value is about inclusion and belonging. It empowers us all to bring our true selves to work and contribute value every day.

#### Customers and business

With a global team as diverse as our customers' needs, we can deliver the right solution every time.

#### Trust and reputation

Striving for a diverse and inclusive work environment is essential to becoming an employer of choice.

### DELIVER We deliver excellence when we:

- Celebrate our differences as a source of collective strength and opportunity
- Promote an equitable work environment in which we recognize and respond to colleagues' diverse needs
- Allow everyone to feel included, valued and empowered to contribute
- Examine our unconscious bias so we can make considered decisions and treat others fairly
- Welcome ideas, opinions and approaches that may be different from our own to broaden our perspective and deepen our insight
- Speak up when we think a point of view is being missed



#### Resources:

Global Diversity and  
Non-Discrimination  
Policy

## Why diversity, equity and inclusion matter to us

### Doing the right thing

By valuing what makes each of us unique and giving everyone a fair chance to contribute and thrive, we align with our Care value.

### Growing our business

Our ability to understand and meet diverse customer needs depends on DXC's own diversity.

### Fueling innovation

The ideas we bring to market are the result of a diverse, inclusive team examining challenges and opportunities from every angle.

### Building trust

When we demonstrate that we share our customers' and business partners' commitment to diversity, equity and inclusion, we build mutual respect and trust.

### Attracting and retaining top talent

A work environment that makes our colleagues feel welcome, respected and valued inspires loyalty and effort and grows DXC's reputation as an employer of choice.

### Improving our communities

A diverse global workforce provides the community insights and connections that enable DXC to drive positive social change around the world.

## Leading by example

I was hired out of college last year, and I love working at DXC. My first role enabled me to shine in areas that really interest me, and I got a quick promotion. My new manager often seems uncomfortable or irritated if I ask questions or offer opinions in meetings. I try to do so respectfully, but I'm afraid my manager thinks I'm overconfident. Lately, I've been excluded from some meetings that I participated in previously. It seems unlikely, but my friend suggested that the manager might feel threatened by me. How should I address this?



At DXC, we develop our people and help them reach their full potential. Whether younger or older, age is no barrier; on the contrary, we look to accelerate careers wherever we see talent. Discriminating against a colleague based on age is illegal in many countries and is inconsistent with our values and culture. Tell your manager that you appreciate the opportunity to join the team and want to contribute whenever and however you can. You should ask if there is anything your manager would like you to do differently since you are still learning how to collaborate effectively. This should help build trust, but if the situation does not improve, you should raise your concerns with Human Resources or DXC Integrity.

## Nurture talent

**COMMIT** We give everyone a fair chance to succeed and grow, based on their merits, performance and potential.

**CONNECT** Values and culture

We attract and nurture talent. This aligns with our Care and Collaborate values and our belief that every individual and team should reach their potential.

### Customers and business

We serve our customers and investors well by hiring and promoting our people on their merits and empowering them to give their best efforts.

### Trust and reputation

We are committed to developing and advancing our people based on merit, free from favoritism, nepotism and unfair discrimination.

**DELIVER** We deliver excellence when we:

- Base hiring and promotion decisions on qualifications, performance and potential — never on favoritism or bias
- Avoid discrimination based on any characteristics protected by law
- Provide reasonable accommodations for colleagues with disabilities or specific requirements
- Maintain an agile workforce by emphasizing collaboration, communication and capability development



**Resources:**

- Conflicts of Interest Policy
- Global Diversity and Non-Discrimination Policy

## Promote wellness at work

**COMMIT** We prioritize our physical and mental well-being so we can all perform at our best.

### CONNECT Values and culture

We want a work environment in which everyone feels safe, energized and engaged. We look out for each other and try to maintain a healthy work-life balance.

#### Customers and business

Cultivating a work environment in which we can all thrive helps us deliver excellence for our customers and colleagues.

#### Trust and reputation

Fostering a positive and supportive work environment promotes a sense of belonging and engagement. This strengthens DXC's reputation as an employer of choice.

### DELIVER We deliver excellence when we:

- Follow all health and safety policies and guidelines at DXC facilities and customer sites
- Maintain a work environment in which we can be safe and productive, no matter where we are working
- Create space for colleagues to feel comfortable in requesting help or advice
- Practice active listening and try to be empathetic with colleagues
- Recognize that we can all make mistakes and treat them as an opportunity to learn and grow
- Support colleagues as we wish to be supported so that we can feel fulfilled at and away from work
- Speak up about accidents or near-misses, suspected hazards, and unsafe or unhealthy conditions or behaviors



#### Resources:

[Health and Safety Policy](#)

[Human Rights Statement](#)

## Take care of yourself

Balancing our work and personal lives can occasionally be a challenge. At DXC, being conscientious should not mean compromising our health and well-being. We can deliver excellence only when we are at our best, physically and mentally. When we are tired or stressed, our judgment may be compromised and we can make mistakes, exposing ourselves and DXC to risk. Taking care of ourselves is essential. If we are feeling stressed or burned out, it is okay to take a pause. Here are several ways we can reenergize and refocus:

- Checking in regularly with teammates
- Joining one of DXC's Employee Resource Groups
- Participating in DXC's monthly well-being programming
- Reaching out to our manager for support
- Blocking off time for personal and professional development (DXC Learning offers many opportunities for this)
- Incorporating mindfulness exercises into our day, such as short meditation sessions or breathing exercises
- Taking short breaks to integrate movement and exercise into the workday

## Leading by example



My role frequently involves handling the personal information of DXC colleagues and business partners. I routinely receive and work on spreadsheets containing personal data: first and last names, phone numbers, home addresses, and government-issued identification numbers. May I email one of these spreadsheets to an approved DXC vendor, provided I password-protect or encrypt the file?

The privacy laws of various countries in which DXC operates have strict requirements on the sharing and/or transfer of personal information. In some cases, we may be required to complete an assessment of the impact of the data transfer. In this situation, however, sending encrypted and password-protected spreadsheets to an approved vendor could be permissible. To be certain, you should consult with Global Data Protection for advice on your specific case.

## Safeguard personal data

**COMMIT** We protect the privacy of our personal data by sharing it only with those who have a business need or legal right to receive it.

**CONNECT** Values and culture

At DXC, our Care and Do the Right Thing values compel us to protect personal data. Preventing its unauthorized disclosure helps our colleagues feel respected and safe.

### Customers and business

The same strong security controls we maintain for internal data equip us to protect our customers and business partners.

### Trust and reputation

When we are committed to safeguarding all personal data as if it were our own, we build DXC's reputation as a reliable, trustworthy company.

**DELIVER** We deliver excellence when we:

- Communicate transparently about why and how personal data is collected, used and stored
- Collect only the personal data that is needed for a specific business purpose, store it securely and dispose of it when it is no longer needed
- Protect personal data by sharing it only with those who have a legitimate business need and legal right to access it
- Adopt DXC security policy controls when storing or transferring personal data to prevent opportunities for unauthorized access
- Follow all DXC privacy and security policies, as well as contractual requirements

## What is personal data?

Personal data is any information that relates to a specific person. It can include:

- Contact information, such as full name, home address, telephone number or email address
- Employment data, such as performance ratings, salary, benefits, time entries, skill profile and utilization/billability (unless aggregated)
- Unique identifiers, such as employee ID, social security number, biometrics (e.g., fingerprints) or anything else that could be used to identify someone
- Financial, medical or demographic data



### Resources:

[Enterprise Employee Privacy Notice](#)

[Global Privacy and Data Protection Policy](#)

# Delivering excellence for our customers

strengthens our relationships and reputation and is the springboard for shared success and growth.

## **Deal honestly and keep commitments**

We are fair, transparent and truthful in all our business dealings.

## **Safeguard customer data**

We protect our customers' confidential business information and personal data as if it were our own.

## **Outperform competitors fairly and honestly**

Delivering excellence every time is our competitive edge.

## **Gain an ethical edge**

We are smart and ethical in monitoring our competitive landscape.

## **Understand special requirements of government customers**

We are proud to serve government customers around the world and comply fully with the specific requirements and laws that apply to them.

## **Cross borders with care**

As a global company, we follow all international trade laws affecting the movement of materials, people and data.

## **Give and receive appropriate gifts and hospitality**

We win business and build relationships based on trust and mutual benefit, giving and receiving gifts and hospitality appropriately.

## **Use artificial intelligence responsibly**

We embrace the possibilities of artificial intelligence while taking care to avoid unintended consequences of its use.

## **Take a stand against corruption**

We win the right way — or we walk away.



Being fair and truthful with our business partners promotes dependable relationships that help us deliver excellence.

## Deal honestly and keep commitments

**COMMIT** We are fair, transparent and truthful in all our business dealings.

**CONNECT** Values and culture

Doing what we say we are going to do is at the heart of our Deliver value. We hold ourselves accountable for meeting our commitments.

**Customers and business**

Truthful and accurate communication about our products and services is essential to meeting commitments to our customers. Being fair and truthful with our business partners promotes dependable relationships that help us deliver excellence.

**Trust and reputation**

Treating customers, colleagues and business partners fairly and being transparent with them is the right thing to do. It enhances our reputation as a company that places trust above transactions.

**DELIVER** We deliver excellence when we:

- Market and sell our products and services honestly, based on their merits
- Prepare bid proposals based on properly estimated cost and pricing data
- Always maintain the integrity of the bidding process and negotiate contracts in good faith
- Focus on the positive attributes of our offerings, rather than disparaging competitors
- Require all our business partners to follow these requirements

## Safeguard customer data

**COMMIT** We protect our customers' confidential business information and personal data as if it were our own.

### CONNECT Values and culture

Our Deliver value means that we are transparent with our customers about how we process and protect the data they entrust to us.

#### Customers and business

To deliver excellence for our customers, we require access to confidential business information and personal data owned by them or their own customers. We take great care to protect this data, as we appreciate how precious it is.

#### Trust and reputation

We are doing much more than safeguarding data; we are securing the future for our customers and DXC while building our reputation as a trusted partner.

### DELIVER We deliver excellence when we:

- Are transparent with our customers about why and how personal and confidential business information is collected, used and stored
- Collect only customer data that is needed for the specific service or solution we are delivering
- Store customer data securely and dispose of it in accordance with customer requirements
- Share customer data only with DXC colleagues or business partners who have a legitimate business need to access it
- Educate ourselves on appropriate safeguards when storing or sharing customer data to minimize opportunities for unauthorized access
- Access customer data only through DXC- or customer-approved systems using the required security controls
- Follow all relevant DXC policies and standards

Our Deliver value means that we are transparent with our customers about how we process and protect the data they entrust to us.



#### Resources:

[Global Cyber Security page on myDXC](#)

[Information Security Policy](#)

[Global Privacy and Data Protection Policy](#)

[Records and Data Management Policy](#)

[DXC Resiliency page on myDXC](#)

[Security Awareness Handbook for DXC Personnel](#)



How we win matters as much as what we win in the marketplace; our values guide our success.



## Outperform competitors fairly and honestly

**COMMIT** Delivering excellence every time is our competitive edge.

**CONNECT** Values and culture

How we win matters as much as what we win in the marketplace; our values guide our success.

### Customers and business

Individuals and teams giving their best is how we deliver excellence for customers. It differentiates our services and solutions and enables us to grow with our customers.

### Trust and reputation

We believe in free and fair markets and compete vigorously and ethically to build our brand and reputation.

**DELIVER** We deliver excellence when we:

- Recognize that competition (antitrust) laws are complex with severe penalties for violations
- Act independently and not in coordination with competitors unless there is a legitimate business arrangement (e.g., a joint venture or teaming relationship)
- Avoid any formal or informal agreements with competitors that limit competition
- Respect competitive bidding processes, and do not rig or fix the outcomes or help anyone else do so
- Seek approval from Regulatory Compliance before participating in trade associations and other groups that require frequent contact with competitors



### Resources:

[Fair Competition Policy](#)

## Gain an ethical edge

**COMMIT** We are smart and ethical in monitoring our competitive landscape.

**CONNECT** Values and culture

Our Do the Right Thing value means only seeking out information about competitors that we can acquire ethically.

### Customers and business

Understanding how we can serve customers better than our competitors is not about spying and stealing secrets; it comes from the insight and imagination we bring to publicly available information.

### Trust and reputation

At DXC, we lead by example; we will never compromise our integrity to gain an advantage through illegal or unethical means.

**DELIVER** We deliver excellence when we:

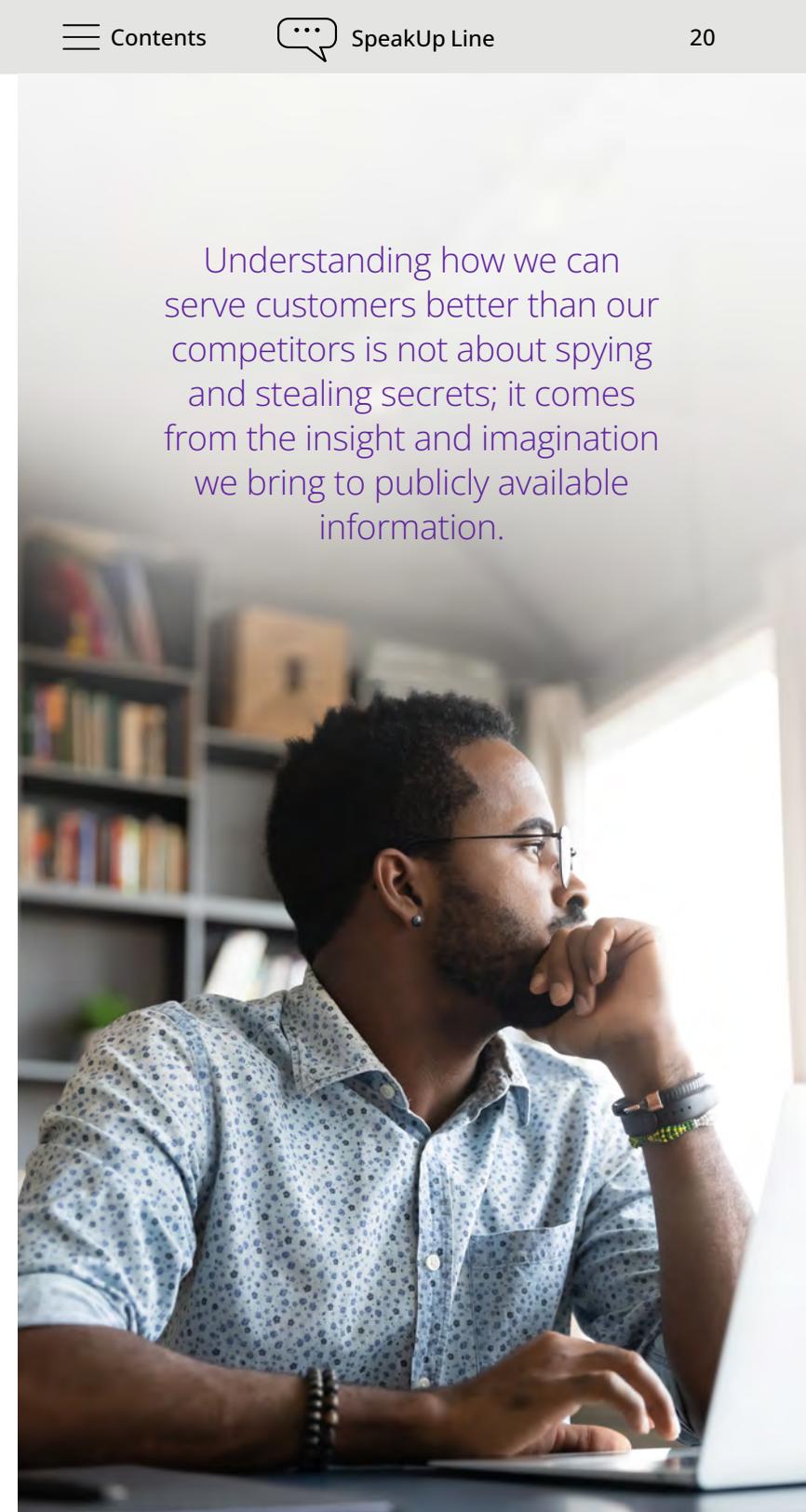
- Seek market information only through public sources, such as news media, industry surveys, financial reports and publicly accessible internet sites
- Never ask current or former employees of a competitor to reveal confidential or proprietary information
- Never use dishonest, deceptive or invasive tactics to obtain competitive intelligence
- Educate market research partners about the importance of acquiring information legally and ethically



### Resources:

[Fair Competition Policy](#)

Understanding how we can serve customers better than our competitors is not about spying and stealing secrets; it comes from the insight and imagination we bring to publicly available information.



## Every last detail

**We strive to deliver excellence for all our customers, so why might there be special requirements when we are serving governments?**

As a government contractor, we have earned special trust and status, which come with additional responsibilities. We often provide critical infrastructure services or support initiatives that are vital to national security.

Some DXC colleagues have the highest levels of government clearances, and our facilities also need to be secure. We must follow the detailed contracting and delivery requirements. Failing to meet our obligations precisely could expose us to significant penalties, legal liability and even debarment from future government work.

We go above and beyond to protect our reputation in the marketplace to help our government customers improve life and business for their citizens.

## Understand special requirements of government customers

**COMMIT** We are proud to serve government customers around the world and comply fully with the specific requirements and laws that apply to them.

### CONNECT Values and culture

Serving government customers honors both our Deliver and Community values. We bring the technology and expertise that support public infrastructure and services across the world.

#### Customers and business

We understand that government contracts often have very different requirements from those of commercial contracts, with severe penalties for noncompliance.

#### Trust and reputation

By earning and preserving the trust of our government customers, DXC can make a positive difference in the lives of tens of millions of citizens.

### DELIVER We deliver excellence when we:

- Know and follow the specific procurement, contracting and performance requirements of the governments we serve
- Comply with all contract terms and required bidding, pricing and quality standards
- Protect secret, classified or otherwise confidential or controlled information
- Comply with relevant IT security, data and asset management policies and applicable regulations
- Charge time, travel, material and other expenses accurately; claim only allowable costs; and follow appropriate accounting practices
- Follow applicable laws, regulations and rules
- Ensure all government-required documentation is current, accurate and complete (e.g., proposals, quotes, invoices, tests, certifications, communications)
- Comply with restrictions on gifts, gratuities, job offers, etc. to government officials and their relatives



#### Resources:

[Conflicts of Interest Policy](#)

[Gifts and Hospitality Policy](#)

[Travel, Expense & Reimbursement Policy](#)

It is essential that we comply with global trade regulations, especially those that restrict or ban DXC from doing business with certain countries. Any export activities with the following countries are currently restricted:

- Belarus
- Crimea, Donetsk and Luhansk regions of Ukraine
- Cuba
- Iran
- North Korea (Democratic People's Republic of Korea)
- Russia
- Sudan
- Syria
- Venezuela



**Resources:**

International Trade Policy

Sanctions Compliance Policy

Anti-Corruption Policy

## Cross borders with care

**COMMIT** As a global company, we follow all international trade laws affecting the movement of materials, people and data.

**CONNECT** Values and culture

We deliver excellence through our global resources and relationships. Complying with applicable trade controls is the right thing to do, and it supports important economic and national security objectives.

**Customers and business**

Collaborating internationally with customers, colleagues and business partners may involve materials, data or people crossing borders. We must always follow whatever regulations affect these movements.

**Trust and reputation**

By committing to following international laws and avoiding trade control violations, we grow our reputation as a trustworthy, long-term business partner.

**DELIVER** We deliver excellence when we:

- Identify and classify the technologies, services and other items that are subject to export or import controls
- Appropriately mark documents, software and other controlled items so that recipients know to protect them
- Carefully screen customers and vendors to ensure that transactions do not involve restricted or sanctioned parties
- Recognize that the laws of more than one country may apply to a particular transaction
- Avoid carrying DXC devices, connecting to DXC systems or working while visiting embargoed or sanctioned countries
- Contact DXC Integrity Regulatory Compliance with any questions regarding international trade laws, sanctions or plans to travel to an embargoed or sanctioned country

## Leading by example

I am a U.S.-based employee managing a team of developers that serves banking industry customers. I have family in Venezuela and need to visit an uncle who is seriously ill. I will be away for a couple of weeks. One of our projects has entered a critical phase, and I need to stay in touch to oversee the team. I'm aware that the U.S. government has recently relaxed sanctions against Venezuela, but I'm not sure whether this means I can travel there with my DXC laptop and phone.

Any DXC employee who plans to work abroad should first consult Global Mobility. In addition to work authorization, payroll, tax and other issues, there may be limitations or a complete prohibition on working in certain countries because of sanctions. Whether you can take your devices and work in Venezuela will depend on exactly which customer accounts you are serving and whether you have access to export-controlled source code or technology. Regulatory Compliance can advise you in detail on sanctions issues.

## Leading by example



I'm attending a business conference. At lunch today, I happened to sit next to a representative of a DXC vendor. We had a friendly conversation and she invited me to a dinner that her company is hosting tomorrow night at an upscale restaurant. When I mentioned this to my colleague, he asked if I knew that this vendor is currently bidding for a big DXC contract. I did not know this, but since I am not part of DXC Procurement, I assume it is okay for me to attend the dinner. Is that right?



Gifts and hospitality that otherwise might be appropriate can be problematic in certain circumstances. When vendors are bidding for DXC's business, we must demonstrate our objectivity and impartiality. We must avoid anything that risks even the appearance of favoritism or compromised judgment. Even though you are not personally involved in the bid process, you are still representing DXC. You should politely decline the dinner invitation on the grounds that attending would not be appropriate while the bid process is ongoing.

## Give and receive appropriate gifts and hospitality

**COMMIT** We win business and build relationships based on trust and mutual benefit, giving and receiving gifts and hospitality appropriately.

**CONNECT** Values and culture

Our Do the Right Thing value means we always act with integrity. We cannot allow even the appearance of improper influence on business decision making.

**Customers and business**

Business courtesies such as appropriate gifts and hospitality help us build goodwill and deepen commercial relationships — but only when we honor our values and follow our policies.

**Trust and reputation**

Giving or receiving gifts and hospitality that are extravagant or lack a legitimate business purpose erodes trust. It can also damage our reputation and violate the law.

**DELIVER** We deliver excellence when we:

- Only offer or accept gifts and hospitality that are legal, appropriate under local customs and compliant with our Gifts and Hospitality Policy
- Are open and transparent, requesting approval when required and making appropriate disclosures in our Gifts & Hospitality Register
- Politely decline the offer of gifts and hospitality that do not comply with company policy
- Do not request business courtesies from others or make them feel obligated to provide something to do business with DXC
- Report any concerns to DXC Integrity



**Resources:**

[Anti-Corruption Policy](#)

[Gifts and Hospitality Policy](#)

[Gifts & Hospitality Register](#)

Giving and receiving gifts and hospitality can help us build positive relationships with our customers and business partners. However, some gifts, such as those below, may never be offered, given or received under any circumstances:

- Cash or cash equivalents, such as stock, debit cards and, in some circumstances, gift cards\*
- Gifts or hospitality to or from the family member of a government official
- Items purchased with unreimbursed personal funds
- Items one could resell or exchange for value
- Service or other noncash benefit (such as a promise of employment, personal favor, direct payment of bills, etc.)

Please refer to the Gifts and Hospitality Policy for a complete list of prohibited gifts and hospitality.

\* Gift cards not exceeding \$100 may be allowable in limited circumstances if they are (1) permissible under applicable law; (2) not given to government recipients; and (3) follow the pre-approval process in the Gifts and Hospitality Policy.

## Use artificial intelligence responsibly

**COMMIT** We embrace the possibilities of artificial intelligence (AI) while taking care to avoid unintended consequences of its use.

### CONNECT Values and culture

We are excited by the possibilities of AI in helping us be more efficient and productive at scale. Our Do the Right Thing and Care values prompt us to be mindful of how our use of technology might create risks that we need to manage.

#### Customers and business

As a technology pioneer, DXC is constantly seeking new ways to elevate our performance and expand our capacity for excellence; we do so responsibly, knowing there is no excellence without integrity.

#### Trust and reputation

Being transparent with customers about when and how we use AI is essential to building trust. They can be confident that they are reaping the benefits of innovative technology without unnecessary risk.

### DELIVER We deliver excellence when we:

- Seek to use AI in an ethical way that minimizes the potential for harm to others
- Are transparent and disclose the use of AI
- Avoid using our own or others' confidential or proprietary information as an AI tool prompt or otherwise
- Review AI output for factual accuracy, appropriateness and the avoidance of copyright infringement, plagiarism and embedded bias
- Ensure that any use of AI complies with applicable laws, regulations and DXC policies
- Understand that AI-related guidance may change from time to time as DXC actively explores the appropriate use of AI tools
- Seek approval from the AI Council prior to using a generative AI tool
- Contact the Office of AI when we have business, legal or ethical questions or need additional guidance



#### Resources:

- [AI Principles](#)
- [Acceptable Use Policy](#)
- [Sensitivity Labeling Policy](#)
- [Information Security Policy](#)
- [Intellectual Property Policy](#)
- [Global Privacy and Data Protection Policy](#)

Being transparent with customers about when and how we use AI is essential to building trust.



## Leading by example



I'm a member of the project team that is planning to open a new delivery center in an emerging market. Some necessary government permits have been delayed for months. A local official is offering to expedite the approval process for a modest one-time fee. Can we pay it?



The official appears to be seeking a facilitation or "grease" payment. That is the term for a small payment that secures or speeds up routine, nondiscretionary and legal government actions. Most national laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, prohibit even very minor facilitation payments — and so do we. We see them as bribes, which we never pay. The local team should see whether they can speak with someone other than this official to get the permits issued. If they cannot resolve the situation, DXC Integrity is ready to help.

## Take a stand against corruption

**COMMIT** We win the right way — or we walk away.

**CONNECT** Values and culture

Our Do the Right Thing and Community values demand that we take a stand against bribery and other corrupt practices. Corruption is not only illegal, but it also harms communities.

**Customers and business**

Our customers expect us to earn their business and select suppliers honestly. Excellence, both expected and delivered, is what wins the day, not improper influence.

**Trust and reputation**

Resisting all forms of corruption builds trust and tells the world we will only do business the right way.

**DELIVER** We deliver excellence when we:

- Never offer or accept bribes, kickbacks or anything of value that could improperly influence — or appear to influence — a business decision
- Avoid promising or providing anything of value to public officials or anyone else to gain a business advantage
- Record all transactions truthfully so that the nature of anything given or received is clear and accurate
- Never use an external party to do anything that we are not permitted to do ourselves
- Comply with the Gifts and Hospitality Policy, always considering how our actions might be perceived by others

### Corruption red flags

Before engaging vendors and other business partners, we screen them to ensure that they operate with the same high ethical standards as DXC. We monitor existing relationships, and this is especially important in countries where there is a higher incidence of corruption. We are watchful for indicators of corruption risk, such as:

- Unusually close relationships with government officials
- Requests for commission payments before a transaction is complete
- Fees that are disproportionate to services provided
- Suggestions that we work with specific people due to a "special relationship"
- Apparent conflicts of interest
- Requests to record an expense differently than its true nature



#### Resources:

- Anti-Corruption Policy
- Gifts and Hospitality Policy
- Gifts & Hospitality Register

# Delivering excellence for our investors

builds a dynamic and resilient organization that can sustain value creation and growth.

## **Avoid conflicts of interest**

We make smart choices for our company and customers, unaffected by personal interests or relationships.

## **Use company systems and resources responsibly**

We use and protect company systems and resources responsibly to help us deliver excellence and value.

## **Protect our confidential information and intellectual property**

We recognize and protect the business value of our confidential information and intellectual property.

## **Respect others' intellectual property rights**

We respect the intellectual property rights of others as we want them to respect ours.

## **Create and maintain accurate records**

We keep accurate records so we can operate effectively and provide timely, truthful and valuable information to those who rely on it.

## **Record time and charge costs honestly**

We charge labor and other costs honestly and are careful to avoid errors.

## **Safeguard inside information**

We never use or share inside information about DXC or another company to trade on the stock market.

## **Create shared value through sustainable operations**

We are committed to policies and practices that grow our business while having a positive impact in the wider world.

## Leading by example



I am a developer and have been advising my brother on an app for his technology startup. He does not compete with DXC. He can't pay me for consulting, but plans to give me a 15 percent stake in the business. Does the situation create a problem, and what are my obligations?

Thank you for being proactive in considering the potential impact of this outside activity on your work at DXC. Our virtual-first working model gives us the flexibility to balance our work with our personal lives; at the same time, DXC trusts us not to abuse this privilege and expects us to follow company policy. You should follow the disclosure process in our Conflicts of Interest Policy. While there may be a potential for a conflict of interest, disclosing it provides the chance to manage it appropriately. The factors that we will consider include the potential for interference with your availability, energy and focus in your DXC job; the likelihood of your brother's business becoming a DXC customer, supplier or competitor; and the financial significance of your proposed ownership stake.

## Avoid conflicts of interest

**COMMIT** We make smart choices for our company and customers, unaffected by personal interests or relationships.

**CONNECT** Values and culture

DXC's values demand that we always do the right thing. We never give even the appearance of anything improper.

### Customers and business

We base our business decisions and actions on full information, thorough preparation and objective criteria.

### Trust and reputation

Acting honestly, transparently and reliably builds trust and helps sustain the delivery of excellence.

**DELIVER** We deliver excellence when we:

- Proactively identify situations that could put our personal interests in conflict with the company's interests
- Disclose actual, potential or perceived conflicts of interest and speak up when we aren't sure
- Remove ourselves from the decision-making process when a conflict of interest may exist
- Don't allow the desire to help friends and family influence our decisions at work
- Avoid being influenced by the prospect of financial gain for ourselves or our family members
- Win business and build relationships based on trust and mutual value — never through inappropriate gifts or hospitality
- Never keep for ourselves opportunities gained through company position or resources
- Give our best effort at work every day, not allowing outside jobs or other activities to hinder our contributions to our business

### What is a conflict of interest?

As DXC employees, we must not allow personal financial interests or relationships interfere with decision making in our jobs.

A conflict of interest may exist where what we think may be best for us personally — or for friends or family — could compromise our objectivity and professionalism at work. This is not to say that our personal interests are less important than DXC's interests; the point is simply that, when working for DXC, our decision making should be based on what is best for our business and customers.



### Resources:

[Conflicts of Interest Policy](#)

[Gifts and Hospitality Policy](#)

## Use company systems and resources responsibly

**COMMIT** We use and protect company systems and resources responsibly to help us deliver excellence and value.

### CONNECT Values and culture

Being good stewards of our assets — physical, financial, technological and reputational — honors our Deliver, Do the Right Thing and Community values. It also protects the building blocks for our future growth.

#### Customers and business

Our assets represent the value we have created for our investors. We use them wisely to fuel our growth by delivering excellence for customers.

#### Trust and reputation

Our assets give us leverage in using the power of technology to build better futures for our customers, colleagues, environment and communities.

### DELIVER We deliver excellence when we:

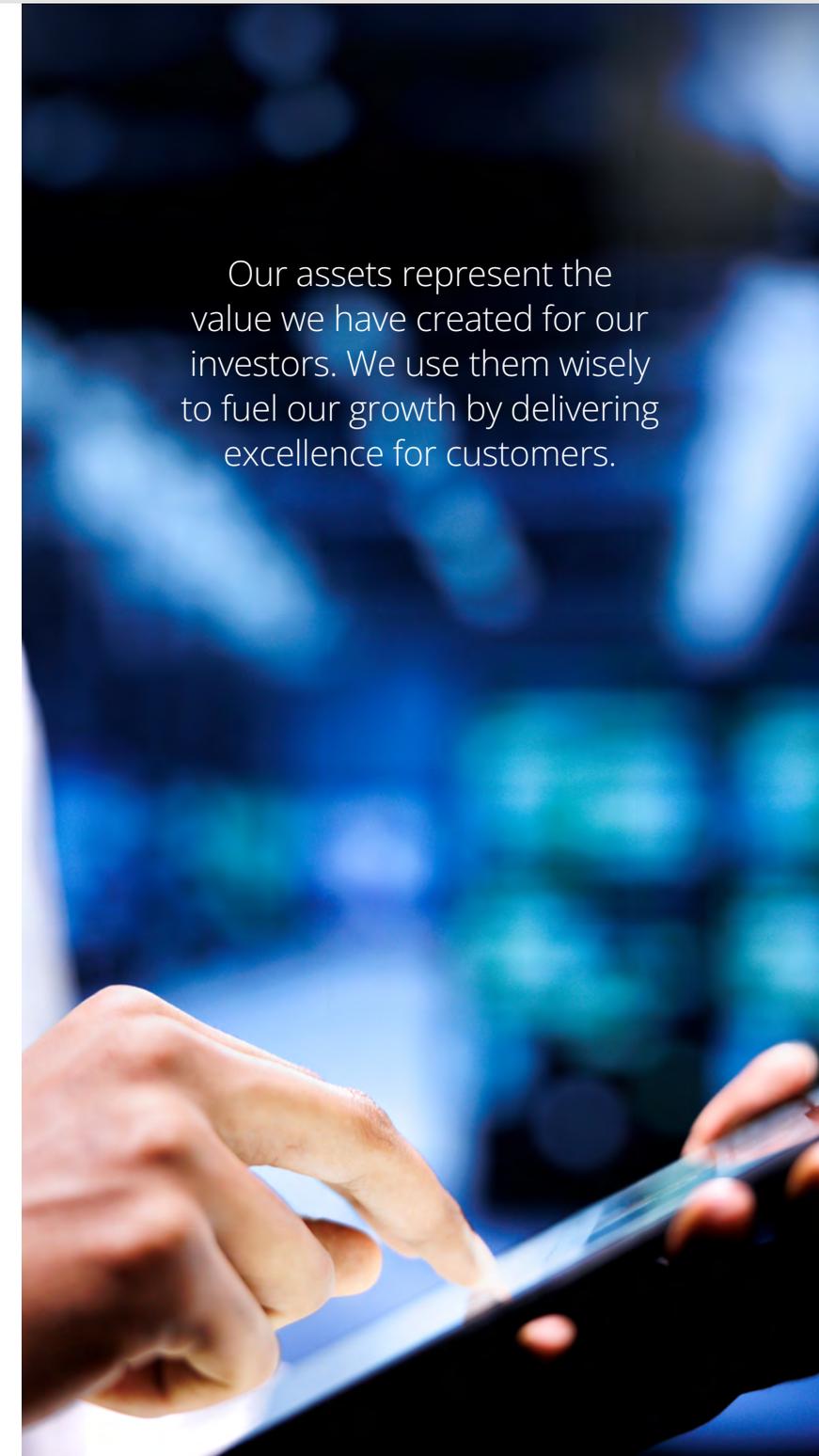
- Handle DXC's assets with care, protecting them from theft, fraud, damage and loss
- Protect the technology assets assigned to us, keeping devices and their data secure
- Use DXC-owned and managed devices responsibly, in accordance with our Acceptable Use Policy
- Safeguard our systems, being vigilant for phishing, social engineering, malware, ransomware and other cyberattacks that could put our network, information or operations at risk
- Report circumstances where we suspect company assets are at risk and cooperate with all audits and investigations

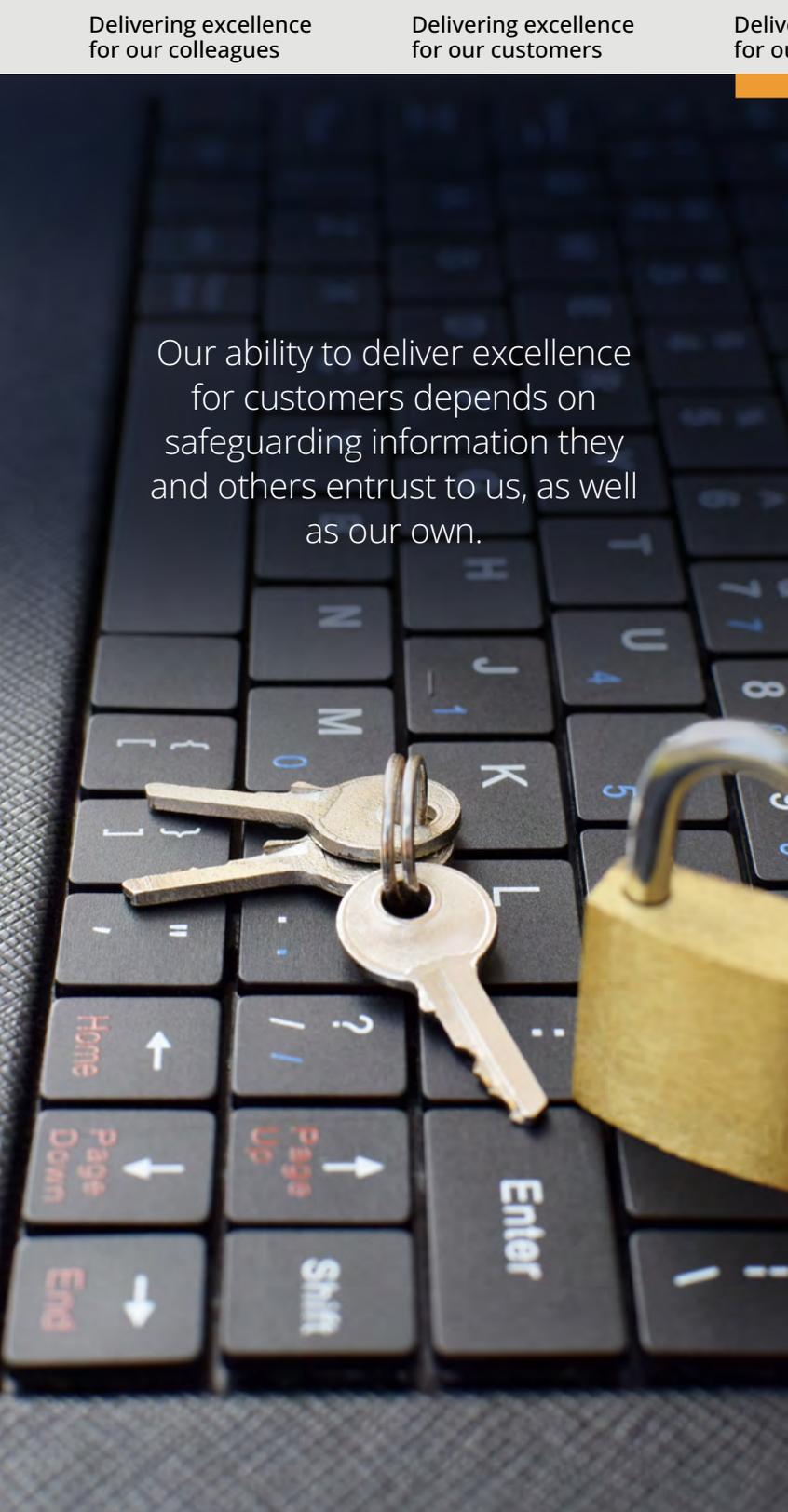


#### Resources:

[Acceptable Use Policy](#)

Our assets represent the value we have created for our investors. We use them wisely to fuel our growth by delivering excellence for customers.





Our ability to deliver excellence for customers depends on safeguarding information they and others entrust to us, as well as our own.

## Protect our confidential information and intellectual property

**COMMIT** We recognize and protect the business value of our confidential information and intellectual property (IP).

**CONNECT** Values and culture

We are proud of our collective, accumulated knowledge. It is powered by know-how and confidential information, which we must protect from unauthorized disclosure.

**Customers and business**

We might lose our competitive advantage if DXC's confidential information became public or if we did not protect our IP.

**Trust and reputation**

Our ability to deliver excellence for customers depends on safeguarding information they and others entrust to us, as well as our own.

**DELIVER** We deliver excellence when we:

- Use best practices to protect DXC's confidential information
- Share confidential information belonging to DXC customers, business partners and others only with those who are authorized and have a business need to know it, with appropriate protections
- Do not discuss confidential matters when there is a risk of being overheard
- Avoid putting confidential information in emails without encryption or other appropriate security measures
- Never use DXC's confidential information for personal gain or to benefit anyone outside the company
- Remember that the obligation to protect DXC's confidential information continues after leaving the company
- Preserve the value of our innovation through patents, copyrights, trademarks and other IP protections as appropriate
- Consult with Legal if we have questions or concerns



**Resources:**

[Intellectual Property Policy](#)

[Sensitivity Labeling Policy](#)

## Respect others' intellectual property rights

**COMMIT** We respect the intellectual property (IP) rights of others as we want them to respect ours.

### CONNECT Values and culture

Our Do the Right Thing value includes a commitment to the Golden Rule: the principle of treating others as we wish to be treated.

#### Customers and business

We grow our business through our own ingenuity and effort, not by taking credit for or misappropriating ideas that are not our own.

#### Trust and reputation

As a trustworthy corporate citizen, DXC will never make use of others' IP without permission. Doing so is wrong and could expose DXC to legal, financial and reputational risk.

### DELIVER We deliver excellence when we:

- Respect others' patents, copyrights, trademarks and trade secrets
- Do not bring to DXC or use a former employer's confidential information or IP (or encourage anyone else to do so) without authorization
- Obtain the appropriate licenses or permissions when using third-party copyrighted material, such as software, images or written content
- Report suspected theft or misuse of proprietary data or IP belonging to DXC or a DXC customer
- Respect moral rights (attribution and integrity) of authors and rights holders under applicable copyright laws
- Protect DXC's rights by disclosing the creation of IP to the Patent Review Board prior to commercialization or publication
- Respect the license requirements applicable to third-party, open-source software used by DXC
- Promptly report any concerns or suspected infringements using the SpeakUp Line

We grow our business through our own ingenuity and effort, not by taking credit for or misappropriating ideas that are not our own.



In growing our customers and business, we rely on financial and operational information that is accessible and accurate.

## Create and maintain accurate records

**COMMIT** We keep accurate records so we can operate effectively and provide timely, truthful and valuable information to those who rely on it.

**CONNECT** Values and culture

Our Deliver and Collaborate values inspire us to continuously improve knowledge sharing, decision making and efficiency; this demands excellent records and data management.

**Customers and business**

In growing our customers and business, we rely on financial and operational information that is accessible and accurate.

**Trust and reputation**

Keeping accurate records is essential to fulfilling our regulatory obligations as a public company. Investors and other stakeholders are entitled to rely on truthful and complete disclosures about our financial and operational performance.

**DELIVER** We deliver excellence when we:

- Record business transactions clearly, accurately and for the right period
- Are transparent when reporting project progress to customers and leadership
- Correct any errors as soon as we discover them, notifying anyone affected
- Securely maintain and, when appropriate, dispose of records according to established retention requirements
- Comply with legal holds and never conceal or destroy records or data until the hold is lifted
- Are vigilant for fraud, dishonesty or other suspicious activity, including the falsification of records or misrepresentation of facts



**Resources:**

[Records and Data Management Policy](#)

## Record time and charge costs honestly

**COMMIT** We charge labor and other costs honestly and are careful to avoid errors.

**CONNECT** Values and culture

Our Deliver and Do the Right Thing values demand honesty and accuracy in tracking time and charging costs. This enables informed business decisions and efficient supply and demand management.

### Customers and business

Prompt and careful time and expense recording enables DXC to forecast project resourcing needs, calculate labor rates and generate accurate invoices.

### Trust and reputation

Maintaining truthful time and cost reports helps establish DXC as an accountable, trustworthy business partner.

**DELIVER** We deliver excellence when we:

- Complete daily or weekly time reports punctually
- Charge time and other costs accurately, in accordance with our policies
- Never knowingly charge an incorrect account or inappropriately shift costs
- Never direct others to violate timekeeping and other cost-charging policies
- Submit expense reimbursement claims accurately and honestly



### Resources:

Time Entry Policy

## Supervise with **C.A.R.E.**

If you supervise others, you are accountable for the accuracy of their time and cost charging. You must emphasize to team members the importance of entries that are:

- **Complete.** Contain all the required information
- **Accurate.** Reflect the correct activity, time period and account
- **Reliable.** Provide timely and truthful information to those relying on it
- **Ethical.** Consistent with DXC's policies and values



## Leading by example



My brother recently lost his job. He is looking to rebalance his investment portfolio and asked me if I recommend investing in DXC's stock. I am aware that DXC will soon announce a new offering in an area that has huge growth potential. For me, this makes DXC's stock a great buy. Can I share this recommendation with my brother?



Definitely not. The information you have has not yet been shared publicly, and it would undoubtedly be relevant to an investment decision. This makes it material nonpublic information, and it would give your brother an unfair trading advantage. Tell your brother that, unfortunately, you cannot advise him at the present time; he should do his own research or seek professional advice. Any time you are unsure whether information you have about DXC or another company is inside information, contact DXC Integrity or DXC Legal for guidance.

## Safeguard inside information

**COMMIT** We never use or share inside information about DXC or another company to trade on the stock market.

**CONNECT** Values and culture

We honor our Community and Do the Right Thing values by preventing the release of nonpublic information, otherwise known as inside information, which could potentially be misused to trade securities.

### Customers and business

We are responsible for protecting not only DXC's inside information, but also that entrusted to us by customers and others.

### Trust and reputation

By preventing insider trading, we do our part to secure the transparency and integrity of the financial markets.

**DELIVER** We deliver excellence when we:

- Never use inside information to trade shares in DXC or any other publicly traded company — unless and until such information has been made public
- Do not share inside information with anyone outside the company, including family members, relatives or friends
- Share inside information with colleagues only on a need-to-know basis
- Take care to protect inside information from accidental disclosure
- Avoid “tipping” — passing along material, nonpublic information about any company to anyone who may be tempted to make investments or trades based on that information

### What is inside information and why must we protect it?

The financial markets function efficiently and fairly when they are transparent. This means not allowing any investors to gain an unfair advantage through access to information that is not public.

In the course of our work, we may know information about DXC (or other companies with which we do business) that is not known to the public. Knowing this information makes us “insiders.” Using it to buy, sell or reallocate stock or other company securities is called “insider trading.” It is illegal. Passing such information to others so that they may trade — known as “tipping” — is also illegal.

Insider trading can result in heavy fines and even imprisonment.



### Resources:

[Insider Trading Policy](#)

## Create shared value through sustainable operations

**COMMIT** We are committed to policies and practices that grow our business while having a positive impact in the wider world.

### CONNECT Values and culture

Our sustainability commitment is rooted in our values. They remind us why it is important to balance financial, social and environmental considerations in our business operations.

#### Customers and business

We collaborate with our customers and communities to take on shared global challenges. We strive to minimize DXC's environmental impact while delivering benefits to a broad spectrum of stakeholders.

#### Trust and reputation

As a large global corporation, we understand that society gives us license to operate. We hold ourselves and our business partners accountable to preserve the trust placed in us.

### DELIVER We deliver excellence when we:

- Recognize that sustainable value creation begins with a growth mindset and caring about the future
- Prioritize trust over mere transactions to build long-term business and community relationships
- Embrace accountability for the environmental and social — as well as financial — dimensions of our performance; we make public disclosures based on internationally recognized standards and frameworks
- Modify business processes and individual actions to reduce carbon emissions and paper usage and increase efficiency in our use of energy and water
- Drive commitment to sustainable, ethical operations throughout DXC's value chain; we prohibit unacceptable practices like corruption, modern slavery and discrimination
- Promote trust and psychological safety in the work environment, so our people can feel comfortable, engaged and productive over the long term



#### Resources:

[Commitment to the Paris Agreement](#)

[Environmental Policy](#)

[Environmental, Social and Governance documents](#)

[Environment, Social and Governance Strategy](#)

[Health and Safety Policy](#)

[Human Rights Statement](#)

[Modern Slavery Statement](#)

[UN Global Compact letter](#)

Our sustainability commitment is rooted in our values. They remind us why it is important to balance financial, social and environmental considerations in our business operations.



# Delivering excellence with our partners

increases our impact and reach as we serve those  
who depend on us.

## **Source responsibly**

We source technology, materials and services ethically and sustainably and expect our business partners to do the same.

## **Select trusted partners**

We select business partners who share our commitment to excellence, ethical conduct and responsible risk management.



DXC's size and global footprint mean we must seize the opportunity for leadership and positive influence throughout our ecosystem.

## Source responsibly

**COMMIT** We source technology, materials and services ethically and sustainably and expect our business partners to do the same.

**CONNECT** Values and culture

We honor our Community, Care and Do the Right Thing values by working only with suppliers who share our commitment to ethical sourcing.

**Customers and business**

As well as suppliers, we partner with our customers and communities to drive positive change throughout DXC's supply chain. The DXC Responsible Supply Chain Principles set out our commitments and expectations in this regard.

**Trust and reputation**

DXC's size and global footprint mean we must seize the opportunity for leadership and positive influence throughout our ecosystem.

**DELIVER** We deliver excellence when we:

- Require suppliers to comply with the DXC Responsible Supply Chain Principles and applicable laws related to human rights; health and safety; fair labor practices; conflict minerals; the environment; bribery and corruption; and equality
- Routinely assess the performance of our key suppliers based on ethical and commercial criteria
- Safeguard the procurement process from improper influence, including nepotism, inappropriate gifts and hospitality, and bribery or other forms of corruption
- Act immediately on issues identified in our supply chain



**Resources:**

[Responsible Supply Chain Principles](#)

[Environmental Policy](#)

[Human Rights Statement](#)

[Modern Slavery Statement](#)

## Select trusted partners

**COMMIT** We select business partners who share our commitment to excellence, ethical conduct and responsible risk management.

**CONNECT** Values and culture

We expect our business partners to do the right thing as they collaborate with us to deliver excellence.

**Customers and business**

We choose vendors and suppliers based on merit and the needs of our customers and business. They must meet our exacting standards for performance and ethical conduct.

**Trust and reputation**

Our partners' actions and business practices reflect directly on DXC. We insist they operate in a manner that preserves the trust we have built with our customers and the public.

**DELIVER** We deliver excellence when we:

- Select the right partners for the job through risk-based due diligence, which includes careful consideration of their track record and reputation for integrity
- Evaluate prospective and existing partners based on objective criteria such as quality, price, service and ability to meet our business needs
- Expect our partners to act consistently with this Code and DXC policies and complete all required DXC training
- Treat all current and potential partners equally and fairly, regardless of the transaction value or duration of the relationship
- Protect the confidential information and intellectual property our partners entrust to us as if it were our own



We expect our business partners to do the right thing as they collaborate with us to deliver excellence.



**Resources:**

[Responsible Supply Chain Principles](#)

[Supplier Contracting and Purchasing Policy](#)

[Third-Party Risk Management Policy](#)

# Delivering excellence for our communities

enables us to make a positive difference in the places  
where we live and work.

## **Communicate with one voice**

We build our brand and stakeholder relationships through clear, consistent and truthful communications.

## **Engage responsibly in the political process**

We participate thoughtfully in the political process, advocating for DXC's interests around the world while bringing positive change to our communities.

## **Respect and protect human rights**

We embed respect for human rights throughout our operations and sphere of influence.

## **Invest in our communities**

We are committed to investing our time, talents and resources to help our communities prosper.

## Leading by example



As I was scrolling through my LinkedIn feed, a comment on a DXC post caught my eye. In my view, the comment was unfairly critical of DXC's position on an important issue. I would like to post my own comment in response, standing up for DXC and pointing out some flawed logic. Can I do this if I am respectful and make it clear that I am expressing my personal opinion?



It's great that you want to be an ambassador for DXC and are being thoughtful about your social media engagement. As a DXC colleague, you are free to express an opinion in public if you do so professionally and indicate that you are not speaking on the company's behalf. Since this concerns an official DXC post, the comment you saw will probably already have been picked up by Communications. You should confirm that they are aware and can address it as appropriate.

## Communicate with one voice

**COMMIT** We build our brand and stakeholder relationships through clear, consistent and truthful communications.

**CONNECT** Values and culture

Since we strive always to keep our word, we must be thoughtful, transparent and honest in what we say publicly, in person and online.

### Customers and business

We know when to rely on the specific skills and experience of our Communications and Investor Relations teams to handle inquiries or to communicate on DXC's behalf.

### Trust and reputation

Communicating with customers, investors and other stakeholders in an authentic and respectful manner can build trust and loyalty.

**DELIVER** We deliver excellence when we:

- Always communicate professionally, regardless of medium
- Refer media, analyst or shareholder requests to Corporate Communications or Investor Relations, as appropriate
- Speak on DXC's behalf only when authorized to do so
- Clearly distinguish private opinions from DXC's official position
- Embrace the opportunity to be responsible ambassadors for DXC's brand
- Pause to consider whether social media posts could be misinterpreted or could reflect on us negatively as individuals or as DXC



### Resources:

[Brand Central](#)

[Financial Disclosures to the Public](#)

[Social Media Policy](#)

## Engage responsibly in the political process

**COMMIT** We participate thoughtfully in the political process, advocating for DXC's interests around the world while bringing positive change to our communities.

### CONNECT Values and culture

We honor our Care and Community values by encouraging everyone to exercise their civic rights. In supporting causes we care about, we separate personal politics from the company.

#### Customers and business

From time to time, DXC may support political candidates or advocate for legislation that benefits our business and customers.

#### Trust and reputation

We ensure that our political participation, as a company and as individuals, is appropriate and transparent. Doing so preserves trust and prevents damage to our reputation.

### DELIVER We deliver excellence when we:

- Engage individually in the political process using only our own time and money
- Avoid lobbying or endorsing political candidates or parties on DXC's behalf without authorization
- Avoid using DXC assets, facilities or other resources in connection with private political participation
- Inform DXC Integrity if we are planning to run for office
- Contribute to a DXC political action committee voluntarily and never pressure colleagues or business partners to do so
- Comply with all applicable laws, lobbying and disclosure requirements, as well as the Government Affairs & Interactions Policy



#### Resources:

Government Affairs &  
Interactions Policy

We ensure that our political participation, as a company and as individuals, is appropriate and transparent.



We deliver excellence for customers and colleagues only if everyone involved is treated with respect, fairness and dignity.



## Respect and protect human rights

**COMMIT** We embed respect for human rights throughout our operations and sphere of influence.

**CONNECT** Values and culture

Our Care and Community values compel us to respect and protect the fundamental rights of everyone working directly for or otherwise supporting DXC.

### Customers and business

We deliver excellence for customers and colleagues only if everyone involved is treated with respect, fairness and dignity.

### Trust and reputation

DXC is committed to using our size and global reach to promote positive social change in our operations and communities.

**DELIVER** We deliver excellence when we:

- Commit to fair employment and compensation practices, following applicable laws and ethical standards
- Condemn and prohibit the use of child labor or forced labor throughout our global operations and supply chain
- Provide a safe and healthy work environment free from violence, harassment, intimidation and other unsafe or disruptive conditions
- Promote diversity and ensure equal opportunity and fair treatment for all
- Prevent and address abusive conduct and harassment in the workplace
- Uphold the freedom of association and recognize the right to collective bargaining
- Ensure the lawful treatment and confidential handling of sensitive information, including personally identifiable information and personal data
- Facilitate the effective reporting, investigation and remediation of human rights concerns



### Resources:

[Abusive Conduct & Harassment Policy](#)

[Global Diversity and Non-Discrimination Policy](#)

[Health and Safety Policy](#)

[Human Rights Statement](#)

[Modern Slavery Statement](#)

## Invest in our communities

**COMMIT** We are committed to investing our time, talents and resources to help our communities prosper.

### CONNECT Values and culture

Our Community value inspires us to look for ways to have a meaningful impact in the communities in which DXC operates.

#### Customers and business

As a global leader in our industry, DXC uses the power of technology to leverage the impact our colleagues can have in the communities in which they live and work.

#### Trust and reputation

Being an active partner in our communities not only reinforces our sense of purpose, but it also earns the respect of those who might consider working with us.

### DELIVER We deliver excellence when we:

- Give our time, energy and talents to projects that help our communities thrive
- Participate in DXC-sponsored community volunteering opportunities
- Volunteer on a personal level, provided this does not interfere with our job responsibilities or create other conflicts of interest
- Obtain proper approval before donating company funds or making contributions in the company's name
- Avoid pressuring others to contribute to charitable causes or to seek anything in return for community contributions

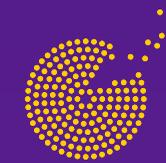


#### Resources:

Charitable Giving  
Policy

## Growing our communities

DXC is committed to making a positive impact in the places we live and work. We're proud of all the initiatives our colleagues take part in. Here are two examples:



**The DXC Dandelion Program.** The DXC Dandelion Program is a holistic employment experience that supports people with autism, attention-deficit/hyperactivity disorder and dyslexia as they pursue long-term careers in the IT industry. DXC prioritizes the success of neurodiverse colleagues in the workplace by providing them with onsite training, mentoring and advocacy from DXC neurodiversity support consultants.



#### Our partnership with Manchester United

**Foundation.** DXC has collaborated with Manchester United Foundation on initiatives that use technology to empower young people, such as the Digital Futures Academy, a 4-year educational program that helps secondary school students in Greater Manchester, U.K., build the digital and social skills they need to become community leaders.

“When we focus on how we interact with others and achieve our goals, we build trust and contribute to a positive, ethical culture grounded in our values.”

— Moe Mohlenkamp



## Closing message from our chief ethics and compliance officer

Colleagues,

It is my privilege to lead DXC Integrity. The mission of my team is to inspire, guide and enable us all to grow DXC's business by doing the right thing. When we focus on how we interact with others and achieve our goals, we build trust and contribute to a positive, ethical culture grounded in our values. This allows us to bring our authentic selves to work, safe in the knowledge that we are empowered to speak up with ideas, questions and concerns. With that in mind, we minimize risks to our business while embracing opportunities to deliver excellence for our customers and colleagues.

Thank you for speaking up and for your commitment to delivering excellence with integrity.

Sincerely,

**Moe Mohlenkamp**

Vice President, Chief Ethics and Compliance Officer  
DXC Technology



## About DXC Technology

DXC Technology (NYSE: DXC) helps global companies run their mission-critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private and hybrid clouds. The world's largest companies and public sector organizations trust DXC to deploy services to drive new levels of performance, competitiveness, and customer experience across their IT estates. Learn more about how we deliver excellence for our customers and colleagues at [DXC.com](https://www.dxc.com).