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| 7. Final Thoughts & Additional Resources  |
1) Introduction to the Code

a. We Win by Following the Code

Our Code of Conduct provides guidance on how to carry out our daily activities across Boomi in accordance with our culture and values, as well as in compliance with the letter and spirit of all applicable laws. Our Code applies to all of us. This includes officers, directors and employees of Boomi and its subsidiaries. Failure to do so may result in disciplinary action, up to and including termination, in accordance with local law. Familiarize yourself with the Code, and the policies and standards that apply to you in your role. Of course, our Code and policies can’t address every possible situation, so it is up to you to use good judgment and seek help whenever you have questions or aren’t sure about the right course of action. We also expect our contingent workers, agents and all others acting on behalf of Boomi to hold themselves to equally high standards.

Our Code is a global Code. Boomi is based in the United States and thus must adhere to all laws applicable to U.S. based corporations. We proudly employ team members and serve customers all over the world. As a result, we must comply with both U.S. laws and the laws of all other countries where we do business. In those rare circumstances where it appears that local law may conflict with U.S. law, contact the Legal Department for guidance. Ultimately, we all adhere to one global standard: we win with integrity!

b. We Show Our Commitment

We all need to show commitment to our culture and values by acknowledging that we’ve read, understand, and agree to abide by the Code. We are required to do this when we are hired and to renew this commitment annually. Please note, the Code is not a contract of employment, and Boomi may interpret, modify, or rescind some or all of the Code provisions, as well as related policies and standards, at any time.

c. We Speak Up and Protect Those That Do Speak up, report concerns.

If you have an ethics concern or suspect that someone is behaving illegally or unethically, please speak up. Talk to your leader, call the Ethics Helpline or website, send an email to legal@boomi.com. or use any of the other resources and reporting avenues described in the Code. Boomi does not tolerate retaliation against anyone who initiates or participates in the ethics process, asks questions or raises concerns in good faith. Team members and leaders are required to cooperate and be truthful in company investigations and follow the instruction of the Legal Department and Human Resources during such investigations.

d. We Leverage the Code

The Code isn’t something you read once. It’s a guide to putting our values into action. Everyone is responsible for reading and understanding how the Code applies to them and what they do at Boomi. If you have questions about any topic in the Code, talk to your leader or contact Human Resources or the Legal Department.

To supplement the general guidance of the Code, where applicable, Boomi has adopted more specific policies and standards that apply globally, geographically or to specific business units,
functions or departments. Policies for review by personnel can be found on Boomi.com, the internal Boomi shared drive, or may be shared by Human Resources or the Legal Department.

e. We Look to Leaders to Set the Tone

If you are a people manager, you have a special responsibility to lead with integrity. It is not enough for you to behave legally and ethically yourself. You must also take affirmative steps to influence your team members to do the same. This requires a vocal and visible commitment to integrity. You must not only adhere to the law, our Code, policies, and standards, but you also must promote adherence and ethical behavior among your team members. This means you must:

- Be a positive role model. Actions speak louder than words, so let your actions demonstrate your belief that although business goals are important, they can never be achieved at the cost of compliance with legal requirements and ethical principles. We can do both — we can win with integrity.
- Set the right tone. Be comfortable talking with your team members about the importance of acting legally and ethically. Explain how our Code supports our purpose and values and ensures our success. Find opportunities to review important concepts during your team meetings.
- Thoughtfully complete your own ethics and compliance training in a timely manner, and make sure your team members do the same.
- Become familiar with the Code, policies, and standards that apply to your organization. Adopt and follow compliance processes designed to ensure compliance.
- Celebrate achievement. Recognize and reward team members whose behavior exemplifies our value of integrity.
- Create an environment where team members know they can ask questions or raise concerns without fear of reprisal. Be available to answer your team members’ questions and address their concerns. Never retaliate against anyone who reports a good faith concern or cooperates with internal investigations or audits. And don’t tolerate others who do.
- Provide appropriate supervision to ensure compliance with the Code. Please report behavior that you know — or should know — is illegal or violates Boomi’ Code, policies, or standards.

Key takeaway: Your team will follow your lead in matters of integrity, including adherence to our Code, policies, and standards and in how they behave. As a leader, you are held to a higher standard.

f. We Believe Our Culture and Values Are Differentiators

We know our culture matters in how we run the business, how we go to market and how we treat each other. It describes what we care about, the things in which we’re willing to invest and the rules that define us as a team. Our culture is defined by our values and made real every day by how we work and lead.
We believe that what we expect from our people, how we support them in achieving it and how we measure and reward them for doing so is fundamental to our success and the longevity of our culture. Our values reflect what’s most important to us as a company and guide our decisions and actions. Our values, which we call culture code, encourage each employee to:

- **GO BEYOND:** We strive to exceed our customers, partners, and community’s expectations because when we help achieve transformational success, we can all go beyond.

- **PLAY FOR EACH OTHER:** We show up for each other with empathy, compassion, and purpose because at Boomi, we win as one. And as we continue to grow, we strive to integrate more diverse voices for a stronger and smarter team.

- **CREATE AWESOME THINGS:** Our curiosity drives us to do better. As a data-driven team, we are inspired by yesterday; but create for tomorrow.

- **OWN IT:** We take ownership for the work we do as individuals and the results they bear. And together, we commit to continuously being better.

- **BUILD TRUST:** We build authentic relationships through actions that inspire confidence in each other, our work, and the integrity that drives us. When we are authentic, we build communities of good humans.

2) **Customer Relationships Are the Ultimate Differentiator and the Foundation for Our Success**

We believe our customer relationships are the ultimate differentiator and the foundation for our success. Our customers and broader stakeholders are the reasons we exist, and they rely on us to listen and provide solutions that will help them succeed. They expect us to operate with the highest ethical standards. To earn and maintain their trust, we are committed to doing business fairly, honestly, legally, and ethically wherever we operate in the world.

   a. **We Protect the Privacy of Customer Personal Information**

Virtually every country regulates the collection, use, storage, disclosure, deletion, and international movement of personal information. When accessing or handling personal information, we must comply with applicable laws and regulations, contractual obligations, the Boomi Code policies and voluntarily adopted standards for protecting individuals’ personal information.

Personal Information Defined: Personal information includes general information about an individual such as name, home address, email and IP address and other contact details. It also includes more sensitive personal information that may be subject to additional specialized legal or contractual obligations such as financial records, government issued identification numbers, credit scores, credit card numbers, medical records, educational or employment records, sexual orientation, race, family status and political or religious affiliations.

Be Intentional and Careful with Personal Information: We use only responsible and lawful means to access, collect, use, share, process, transfer, or store the personal information of others, and use personal information solely for legitimate business purposes.
If your role requires you to have access to personal information, make sure you take steps to properly protect it and ensure that your access or use is authorized by Boomi. We give clear notice to individuals of how we will use their personal information, and we respect customers’ and prospective customers’ communication preferences. We keep personal information secure in accordance with Boomi security requirements. Additional specific safeguards apply to customers’ payment card and other financial information.

We Take Data Privacy Seriously: Each Boomi employee is responsible for protecting the confidentiality, integrity, and availability of personal data which is processed or controlled by Boomi. In the course of your duties, you may access data about our business contacts, customer data (including personal information), and data about Boomi personnel. You must observe all applicable data privacy standards, laws, rules, regulations, and statutes with respect to this data as well as all policies related to personal data and data privacy. You can always contact Legal for more information on these requirements.

Collecting, Using, and Sharing Personal Information: Do not collect, use, access, or share personal information except as necessary for your job and the jobs of those with whom you share information. If you or your team initiate an activity where personal information will be collected, consult with Boomi’s privacy experts in Legal to determine whether a privacy impact or security assessment is necessary. If you transfer personal information from one country to another, even to share with a colleague or third party in another country, make sure the transfer is an approved part of your job.

We must respect individuals’ interests in their own personal information. Should you get an inquiry from an individual regarding information we hold on that person, you should handle that request in accordance with Boomi policy. If you have any questions in regard to such policy, forward your inquiry to the Privacy team at privacy@boomi.com. When authorized to dispose of personal information of another, be certain to do so responsibly and in accordance with Boomi policies and standards.

Third Parties: Our business partners must share our commitment to protecting and appropriately using personal information. Before sharing personal information with any business partner, be sure the partner has executed the appropriate contracts, memorializing their commitment to following the law and adhering to Boomi’ policies and standards. Be aware, too, that we disclose data subprocessors with access to customer data to our customers, so proper onboarding of vendors and disclosure of those subprocessors is essential.

**Key takeaway:** We must protect and be intentional and careful about the collection, access and disclosure of any customer personal information we handle.

**Resources:** Boomi US and Global Privacy Policy [https://boomi.com/privacy/](https://boomi.com/privacy/)

b. **We Are Committed to Quality, Security and Safety in our Solutions**

Boomi focuses on earning our customers’ trust and loyalty by: Listening to, learning from, and responding to our customers; delivering services and solutions that consistently meet
expectations for quality, value, and customer experience; and driving continual process, product, and service improvements.

We are committed to compliance with the laws and regulations in each country into which we provide products and services. Boomi takes every opportunity to minimize harmful impacts on our planet. We investigate all credible good faith reports of suspected safety and security issues and take appropriate corrective action when necessary or prudent. If you have questions or concerns about the safety, security, or compliance of a Boomi product or service, contact the officer over Legal, HR, Security, or Product, as applicable.

**Key takeaway:** Our products and services must be safe, secure, and dependable, meeting all applicable legal and regulatory requirements, as well as the quality standards as set forth by the company.

c. We Compete Fairly

Virtually all countries have laws prohibiting or regulating transactions and relationships that could have the purpose or effect of limiting competition. We must compete fairly and vigorously and in full compliance with these laws. Any violation of these laws may result in discipline and could result in civil or criminal penalties for you and Boomi. The following types of arrangements are or could be viewed as anti-competitive and can never be discussed or entered into without advance, express written consent from the Legal Department:

- agreements to fix or control prices;
- agreements not to compete for certain business or bids, or agreements with competitors on the terms of any bids;
- agreements between companies, whether competitors or not, to not hire or solicit employees or to set employee compensation;
- boycotting specified suppliers or customers;
- agreements to divide or allocate markets or customers;
- limiting the production or sale of certain product lines;
- tying or bundling certain products in a sale, or
- any other agreements that would have the effect of limiting competition.

We may tell a reseller our price to the reseller but do not restrict resale prices. Be especially careful when interacting with competitors. To avoid even the appearance of an agreement, avoid discussing with competitors such things as prices, terms of sale, territories, customers, bids, volumes, costs, profits, market share, salaries, hiring practices, distribution methods, relationships with suppliers or non-public information about product or services.

**Key takeaway:** We believe that a free and competitive market serves our customers best. Competition laws are complex. Consult the Legal Department before entering into any discussions with competitors, customers, resellers or suppliers about agreements or arrangements, whether in writing, oral or implied, that could have the effect of limiting competition.
d. We Require Proper Contracting

To ensure compliance with legal, accounting and financial reporting requirements, and to protect Boomi’s assets from fraud, waste and abuse, Boomi has established policies, standards, procedures and controls governing the negotiation, review, and approval of contracts between Boomi and its customers, suppliers, vendors, business partners, and other stakeholders.

Authority to enter into or sign any contract on behalf of Boomi’s has been delegated to certain team members depending on the nature, scope and financial value of the contract involved. If you are involved in negotiating on behalf of Boomi make sure you understand and follow these contracting policies, act only within the authority delegated to you under those policies, and, where applicable, ensure that all necessary approvals from the finance, accounting, procurement, sales operation, and legal departments have been obtained. You may not make financial commitments on behalf of Boomi without proper authorization.

Side letters – whether with customers, suppliers, vendors, business partners, and other stakeholders – are prohibited and may lead to incorrect financial reporting, serious problems for Boomi. Side letters include any promise you make that could have a financial or legal impact on Boomi that has not been authorized through our standard contracting process and has not been properly approved and included in a valid contract or quote – whether made orally or in writing, in any form. This can include without limitation post-sale discounts, rebates, or commitments to undocumented obligations.

If you are concerned with the speed of a contract process, collaborate with the applicable team members including Legal and/or Procurement to find a smart path. Simply signing an un-reviewed or unauthorized agreement in conflict with our policies is prohibited. Side letters, and/or signing or approving contracts or commitments in violation of this policy, are grounds for discipline up to and including termination.

**Key takeaway:** We must adhere to our established policies, standards, procedures, and controls governing the negotiation and approval of contracts.

e. We Follow Government Contract Regulations

We always follow the rules: If you are involved with public customers (like Federal Agencies, State Governments, Local Governments, or Public Universities) you must ensure you understand and comply with all applicable rules. Likewise, you must be diligent in requiring that consultants, resellers, suppliers or other business partners providing goods or services in connection with government or publicly-funded contracts meet all qualification and performance standards and requirements. The consequences of non-compliance are serious.

We secure business the right way: Information submitted in connection with bids or tenders for government contracts must be current, accurate and complete. We never offer bribes, kickbacks, or preferential treatment in connection with a government contract. With limited exceptions (which must be pre-approved in writing by the Legal Department), we are also prohibited from providing anything of monetary value to government employees or their family members. This includes gifts, hospitality, travel, lodging, services, discounts, and meals.
Key takeaway: Contracts with government customers, or commercial transactions financed in whole or in part with public funds, have additional requirements.

3) Play for Each Other

We show up for each other with empathy, compassion, and purpose because at Boomi, we win as one. And as we continue to grow, we strive to integrate more diverse voices for a stronger and smarter team. We believe in and value our people. We perform better, are smarter, and have more fun working as a team than as individuals. Our relationships and collaboration drive our business success. We nurture those relationships by seeking out and welcoming diversity, being open and honest in our interactions, and creating an environment of collaboration and inclusion. We treat everyone with dignity and respect and comply with all laws relating to employment rights and working conditions in the countries where our team members live and work.

a. We Value Diversity, Equal Opportunity, and Respect

We are committed to diversity, equality, and providing a safe and productive environment that fosters open dialogue and the free expression of ideas, free of harassment, discrimination, and hostile conduct. We recognize a shared responsibility to create and maintain that environment for the benefit of all.

We promote equal opportunities and fair treatment for all team members, customers, business partners and other stakeholders, regardless of race, color, religion or belief, creed, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, HIV Status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, protected veteran status, citizenship status when otherwise legally able to work or any other status protected by the laws or regulations in the locations where we operate. We provide equal employment opportunity to everyone who is legally authorized to work in the applicable country and we provide reasonable accommodations to individuals with disabilities.

All team members are expected to report suspected discrimination promptly and never retaliate against anyone who raises a good faith concern that unlawful discrimination has occurred. Our commitment to these principles is essential to our success.

Key takeaway: Boomi is committed to diversity, equality, and providing a safe and productive work environment that fosters open dialogue and the free expression of ideas, free of harassment, discrimination, and hostile conduct.

b. We Prevent Harassment and Discrimination

We treat everyone — team members, customers, business partners and other stakeholders — with dignity and respect. We must all be able to do our jobs in a safe and respectful environment without the distractions and disruptions caused by offensive, unprofessional or inappropriate behavior in the workplace. Harassment can include actions, language, written materials, or objects that are directed or used in a way that undermines or interferes with a person’s work performance, or creates an intimidating, hostile or offensive work environment. We never target anyone for negative treatment on the basis of race, color, religion or belief, creed, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, HIV Status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership
status, past or present military service, family medical history or genetic information, family or parental status, protected veteran status, citizenship status when otherwise legally able to work or any other status protected by the laws or regulations in the locations where we operate. All forms of harassing conduct are prohibited at Boomi, including without limitation:

- unwanted sexual advances, invitations or comments;
- visual displays such as derogatory or sexually-oriented pictures or gestures;
- physical conduct including assault or unwanted touching; or
- threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences.

All team members are expected to report suspected harassing conduct promptly and never retaliate against anyone who raises a good faith concern that unlawful harassment has occurred.

**Key takeaway:** All team members should be able to do their jobs in a safe and respectful environment without fear of harassment. Harassment is prohibited and will not be tolerated.

c. We Respect Human Rights

Boomi has practices in place to ensure respect for human rights of all team members, as well as people outside of our organization who are impacted by our value chain, such as workers in our supply chain or business partners. This includes criteria such as appropriate wages, working hours, working conditions, prevention of forced labor or child labor and health and safety, among others, and the prohibition of any form of modern slavery, which could include slavery, servitude, human trafficking and forced labor taking place within the business and our supply chain. If you suspect that your or another’s rights are at risk or are being asked to conduct business in a way that could violate another person’s fundamental human rights, we encourage you to speak up.

**Key takeaway:** Boomi respects the fundamental human rights of all persons in our value chain.

d. We Work Safely and Protect the Environment

You are expected to perform your work in full compliance with all applicable health, safety, and environmental laws and regulations. This requirement applies whether you are working at a Boomi site, a customer site, or a remote location. Additionally, alcohol, illegal drugs and controlled substances can adversely affect safety, productivity, attitude, reliability and judgment. With the exception of lawful, moderate, and prudent alcohol consumption during legitimate business entertainment, you are prohibited from consuming or being under the influence of alcohol, or possessing, distributing or being under the influence of illegal drugs while engaging in Boomi business.

You must report all accidents, injuries, unsafe work conditions, and other environment concerns immediately to your supervisor, and to others as described in the applicable procedures. If you hire and/or procure contractor or business partner work, you must ensure that each contractor
and partner has programs appropriate to the type of work to be performed, is made aware of other potential hazards in the work area, and follows any applicable contractor safety and environmental requirements. If you work at customer or supplier/partner locations, you must follow the stricter of the applicable health, safety, and environmental requirements of Boomi or the customer or supplier/partner.

**Key takeaway:** Team members are expected to perform their work in full compliance with all applicable health, safety and environmental laws and regulations, as well as any related Boomi requirements.

e. **We Ensure a Non-Violent Workplace**

A non-violent workplace always starts with being polite and respectful. If you disagree with a team member or other person at work, try to resolve it calmly. Never bully, threaten, intimidate, or harm another person or their property through verbal behavior (written or oral) or non-verbal behavior (such as gestures or expressions).

Unless authorized by law or Boomi policy, you may not possess, conceal or use weapons, including firearms, knives, clubs, ammunition, explosives or other devices that are primarily used to inflict injury (including recreational weapons such as hunting rifles or crossbows, toy weapons or replicas that can easily be viewed by most people to be real or authentic) while on Boomi property or when conducting Boomi business. This prohibition does not apply to knives or other tools which are required, permitted, or provided by Boomi as part of your job assignment. This policy applies to anyone who enters Boomi property, which includes buildings, parking lots, walkways and any other property we lease or occupy.

**Key takeaway:** A workplace free of violence, weapons, and other disruptive behavior keeps team members safe.

f. **We Protect the Privacy of Team Members’ Personal Information**

Each of us has the responsibility to safeguard team members’ personal information. We comply with all applicable privacy and data protection laws in the countries where we operate. Consistent with local laws, Boomi may collect personal information about team members to meet legal requirements or enable effective business operations. If your role requires that you have access to team member personal information, make sure you take steps to properly secure it, and that you access or use it only when authorized by Boomi for legitimate business needs and in accordance with applicable laws and Boomi policies. Regardless of your role, if you gain access to a team member’s personal information or other private data, always take care to keep it secure. Never share it with anyone — inside or outside of Boomi — without the team member’s permission except as necessary to meet legal or legitimate business requirements. If this information comes to you inadvertently and/or is not required as a part of your role, it is expected that you will inform Human Resources immediately.

**Key takeaway:** We all have a responsibility to protect team members’ personal information.

4) Innovation

We believe our ability to innovate is an engine for growth, success, and progress. Our culture code challenges us to Create Awesome Things: Our curiosity drives us to do better. As a data-driven team, we are inspired by yesterday; but create for tomorrow. We strive to think and create beyond our limits and work with others to better our communities and our planet. As innovators in a competitive marketplace, we also need to protect valuable Boomi property.

a. We Safeguard Our Confidential Information

Boomi confidential or proprietary information is a tremendously valuable asset that differentiates us from our competitors and is protected by law and key agreements. Everyone is responsible for the protection of Boomi confidential or proprietary information and trade secrets. Misusing or disclosing information that Boomi considers confidential or proprietary or a trade secret, whether during or after employment, is prohibited and is a violation of the Code of Conduct and your agreements. In certain circumstances, it may also be a violation of law. Inappropriate disclosure may also result in serious consequences to you and Boomi. Before you disclose or distribute any confidential information, senior management approval must be obtained, and the appropriate terms of use established. This often requires the execution of a written confidentiality or nondisclosure agreement, which restricts the use, disclosure, or distribution of the information. Particular customers or vendors – for example, the U.S. Government – could have special added non-disclosure obligations, and Boomi team members must follow all such obligations.

Boomi confidential information is any information that is not publicly available and/or has a level of sensitivity requiring increased levels of protection, management, or disposition. Confidential information includes (but is not limited to) information about our company, our products, nonpublic financial information, personal information about our team members, and third-party information that has been entrusted to us to protect. Both during your employment and thereafter, you are prohibited from using Boomi confidential or proprietary information for your own benefit or disclosing such information to anyone outside of Boomi, without express authorization, unless permitted to do so. All Boomi confidential or proprietary information must be returned when you terminate employment with Boomi. Any taking, downloading, disseminating or other prohibited use or disclosure of Boomi confidential or proprietary information could constitute theft of Boomi property.

Additionally, you must take steps to prevent inadvertent disclosure of Boomi confidential or proprietary information. In addition, you should not discuss any non-public or confidential or proprietary information about Boomi with outsiders, including family and friends, and should not discuss such information in any public place, such as an elevator, restaurant, or airplane. Even within Boomi, information should be shared with others only on a “need to know” basis. You should not post any Boomi confidential or proprietary information when using social media tools such as blogs, internet chat boards, or social networking sites without prior express authorization.

You must be careful to only discuss Boomi confidential or proprietary information with customers, partners, or suppliers in adherence to the applicable practices and policies and with a fully executed non-disclosure agreement between Boomi and the other party. In some cases, Boomi
has special policies or procedures in connection with its business relationships that require heightened attention to the safeguarding of Boomi confidential and proprietary information.

**Key takeaway:** Misusing or disclosing information that Boomi considers confidential or proprietary, or a trade secret, whether during or after your employment, is prohibited and is a violation of the Code of Conduct and your agreements with Boomi.

### b. We Safeguard the Confidential Information of Others

Boomi competes vigorously, but fairly. We protect Boomi’s intellectual property, trade secrets, and confidential or proprietary information, and we respect the rights of others to do the same. You may use publicly available information about Boomi competitors or other companies, but you may not unlawfully acquire or misuse the trade secrets or other confidential or proprietary information of any third party.

Boomi prohibits the use of any means, such as cash payments, favors, or hiring a competitor’s employees, to acquire confidential or proprietary information of third parties. Even if you receive information about another company through legitimate means, you need to determine if the information is confidential or proprietary and how such information may be used. For example, check written documents for labels that designate them as private or confidential. Before using confidential information, approval from the Legal Department must be obtained and you must establish the appropriate terms for its use. This may require the execution of a written confidentiality or nondisclosure agreement, which restricts the use, disclosure, or distribution of the information.

Once you have received confidential information through legitimate means, you should use, copy, disclose, modify and/or distribute it only in accordance with the terms of any relevant confidentiality or nondisclosure agreement. You must also abide by the lawful obligations you have to your former employer(s). These obligations may include restrictions on the use and disclosure of confidential information or solicitation of former colleagues to work at Boomi, or non-competition agreements.

**Key takeaway:** Team members may not unlawfully acquire or misuse the trade secrets or other confidential or proprietary information of any third party.

### c. We Practice Effective Information Lifecycle Management

You are required to adhere to Boomi’s information governance and document retention policies and standards. Certain Boomi business, transactions, and other information must be retained for a specific period of time in accordance with legal requirements. To adhere to those requirements, Boomi has created a document retention schedule and a legal hold process. It is your responsibility to retain such information in accordance with applicable retention requirements and store it in approved, protected electronic or physical storage locations.

Boomi information that is not subject to a retention schedule or legal hold, or is subject to a retention schedule or legal hold but can now be disposed of because the schedule allows it or the hold has been lifted, should be disposed of in a secure manner.
**Key takeaway:** Everyone is responsible for the appropriate protection, management, and disposition of Boomi information in accordance with this Code, Boomi policies and standards and applicable law.

d. We Use Information Technology and Other Resources Wisely

You may occasionally use Boomi resources, including information technology resources, for limited personal use, but this use must be appropriate and kept to a minimum. Inappropriate use includes, but is not limited to, engaging in illegal activity, or viewing inappropriate material, including adult or pornographic sites, hate sites or sites which would put the Boomi brand at risk. Boomi resources should never be used excessively or to support secondary employment, outside business ventures or personal political activities.

Boomi provides information technology resources to you for the purpose of performing your role for the company. At all times, Boomi retains ownership over the resources. Consistent with local laws, Boomi reserves the right to monitor and review the use of its resources and to access all data on its resources, including its information technology resources. Where permitted by local law, your use of the resources constitutes consent to such monitoring and review including when utilizing encryption, which Boomi reserves the right to decrypt as part of their monitoring efforts.

Everyone has an obligation to keep our information technology resources safe from viruses, malicious software programs, and intrusion attempts by following all information security policies and never tampering with or disabling the Boomi managed security software on a system. You are responsible for all activity performed with your individually-assigned user ID and your assigned IT resources. Ensure that all software and hardware purchases and agreements (or any free or purchased software downloaded on your work device) are approved by the Information Technology Department. If you have access to customer information technology resources, you should follow policies and procedures relating to the use of information technology resources and to information security as directed by the customer.

**Key takeaway:** While some personal use of Boomi resources is permissible, excessive, or inappropriate personal use is prohibited.

e. We Communicate Responsibly

We follow our culture code and communicate in ways that demonstrate our values, further our purpose and enhance our reputation and brand. Avoid offensive or inflammatory language at Boomi, as well as anything that would embarrass or disparage Boomi, your co-workers, or customers.

Unless explicitly authorized to speak on behalf of Boomi, you must make it clear that your personal views are yours alone and do not reflect Boomi’s views or represent an official company position. Take care when using instant messaging (IM), texting, weblogs (“blogs”), chat, social media, and other avenues for electronic or online communication. Boomi supports such open communications, as long as such communications are done legally and ethically.
Adherence to privacy laws and security is critical to Boomi. We never email or share customer data or employee data in violation of privacy laws or security requirements or share it in any way that could conflict with any promises made to the employee or customer.

Boomi’s public statements must be carefully managed to ensure accuracy, fairness, and compliance with all legal requirements, as well as to protect our reputation and ensure consistency with our values and brand. Boomi uses certain distribution channels — such as press releases, media, and analyst conferences and statements on Boomi.com — to communicate our company’s official position to the public. Use of these channels is limited to authorized individuals and information shared must be valid, accurate and approved for public release. Only authorized individuals can communicate the company’s official position on certain topics such as financial performance, strategic business plans, legal matters, and public policy issues. Any Boomi press release requires Legal review before issuance.

Everything we tell customers and prospective customers about our products and services - in our advertising, sales, and marketing communications or otherwise - must be truthful, accurate, complete, and understandable. Don’t mislead customers by exaggeration, by omitting vital information, or by advertising products, features, or services you are not confident we can deliver. Make sure you comply with all internal requirements relating to the review and approval of advertising and marketing communication materials.

Key takeaway: We should always communicate in ways that support our business, values, and purpose, and enhance our reputation and brand. Public statements on behalf of Boomi are only permitted by authorized individuals.

5) Results

We believe in being accountable to the exceptional standard of excellence and performance. We are committed to winning business based solely on the merits and integrity of our products, people, and solutions. We are dedicated to being a trustworthy partner in the communities in which we work.

a. We Safeguard the Integrity of Financial Statements

The integrity of our financial statements and other regulatory filings is critical to the successful operation of our business, and to maintaining the confidence and trust of our customers, business partners, and other stakeholders. All financial information about Boomi filed with any governmental organization or disclosed publicly, as well as all information in statutory financial statements and tax filings must be accurate and complete and must comply with applicable accounting principles and legal requirements. To ensure this, only authorized Boomi team members, guided by the Legal Department, can make such filings.

We follow proper contracting with customers and vendors and provide stakeholders (including auditors, investors, creditors, and coworkers) with information that is accurate, objective, fair, relevant, timely, and understandable, so that we can record financial obligations correctly. We never misrepresent our financial or operational performance or otherwise knowingly compromise the integrity of the company’s financial statements. We do not enter information in the company’s
books or records that intentionally hides, misleads, or disguises the true nature of any financial or non-financial transaction, result or balance, nor do we enter into any unauthorized agreements or allow any activity that could lead to that result. We always follow all processes and controls designed to ensure the accuracy of Boomi’s assessment and reporting of its financial results.

**Key Takeaway:** Our financial statements must always honestly and accurately reflect our financial and operational performance.

b. No Insider Trading

You should never use or disclose material non-public information prior to its official public release. “Material non-public information” about a company is information that a reasonable shareholder would consider important in making a decision to buy or sell stock. Examples include yet-to-be-announced financial or company performance information, mergers or acquisitions, supplier or customer relationships, changes in senior executive management and new products.

Insider trading occurs when an individual with knowledge of material non-public information about a company uses it to gain profits or avoid losses in the stock market. You may have access to “inside” information about current or potential suppliers, customers, or acquisition targets. You are obligated to keep this information confidential and you, your family members, and individuals with whom you have a personal relationship must never use this kind of information to trade in any company’s securities. Likewise, you must never provide stock tips or share inside information with any other person who might use it to trade stock. Even if you don’t intend for someone to act on the information, sharing it would violate your confidentiality obligations to Boomi and could result in accusations of insider trading against you or Boomi.

There are serious legal penalties for insider trading and tipping, including civil liabilities and criminal sanctions (such as a possible jail sentence).

**Key takeaway:** Using material non-public information for personal financial gain, or sharing it with others for their financial gain, is prohibited by company policy and potentially illegal.

c. We Follow Anti-bribery and Anti-corruption Laws

Boomi is committed to winning business only on the merits and integrity of its products and solutions. We do not tolerate bribery or corruption, regardless of where we are located or where we do business. Bribery and corruption are forbidden with respect to both public and private entities, both by this Code and Boomi practices and standards but also, in some countries, by law.

Never provide or accept anything of value that could be perceived as a bribe. Regardless of local practices or competitive intensity, you must avoid all activity which could constitute bribery or corruption or could give the appearance of bribery or corruption. This is particularly the case with employees and officials of governments, state-owned or controlled entities, political parties, and international organizations. Although you must pay particular attention when dealing with public
entities and their employees, many anti-corruption laws — and this Code and Boomi practices and standards — cover private entities and employees as well.

Complex rules govern the giving of gifts (including but not limited to meals, tickets, hotel stays, in-kind donations), hospitality, and other business courtesies to government officials and employees of governmental or quasi-governmental entities. What may be permissible for commercial customers may be illegal when dealing with the government. All payments, disbursements, rebates, marketing development funds, discounts, credits, or other exchanges of currency to a customer or third party must be for legitimate business purposes. You must fully comply with the anti-bribery and anti-corruption laws of the countries in which we do business, and the U.S. Foreign Corrupt Practices Act (FCPA) as Boomi is based in the United States. These laws apply to the actions of our company, our team members, and third parties who work on our behalf anywhere in the world.

**Key takeaway:** **Boomi earns business because we have the best products and solutions anywhere. We don't win business by bribing anyone, ever. Don't accept a bribe from anyone, ever. A bribe may be anything of value — such as cash, hospitality, travel, gifts, loans, charitable donations or job opportunities — offered for an improper purpose or in order to win or keep business.**

d. **We Follow Compliance with Trade Laws**

Trade laws provide that we cannot:

- export products, services, technology or software, or engage in prohibited sales to embargoed countries or to entities associated to those countries such as embassies or banks — even if the entity is located outside the embargoed country;
- provide our products or services for prohibited end-uses (such as terrorist activities, missile technology and proliferation of nuclear, chemical or biological weapons);
- provide our products or services to prohibited end-users; or
- transfer or release products, services, technology, or software requiring an export license without obtaining the appropriate authorization.

Be aware that lists of prohibited users are always being updated by various governments, and can render ongoing service illegal, even after a contract was signed. And be aware that an export includes exposing technology to someone who is temporarily in the country, so that even a meeting within your own office could be a deemed export if the viewer if not a permanent resident or citizen.

When importing, we must exercise reasonable care in all customs matters to ensure that we accurately classify, value, determine country of origin and specify all facts reportable to customs authorities. We expect our partners to demonstrate this same commitment.

**Key takeaway:** **Boomi operates all over the world and complies with applicable laws regarding the import or export of goods, services, software, and technologies, including U.S. economic and trade sanctions laws and regulations, in every country in which Boomi conducts business.**
e. We Prevent Theft and Fraud

Theft is taking something that doesn’t belong to you without permission. It can include physically taking something like money or property, or it can be done through other means like forgery, embezzlement, or fraud. Fraud is a type of theft by deception. It is making someone believe (by words or conduct or by concealing important information) something that isn’t true, with the intent of having them take (or refrain from taking) some action that results in them suffering economic harm. Anyone who engages in or assists others with theft or fraud in connection with their roles at Boomi will be subject to disciplinary action up to and including termination and will also be subject to prosecution. Help safeguard Boomi’ assets and reputation by watching for any kind of fraudulent activities against Boomi, our team members, customers, shareholders, business partners or other stakeholders and report suspicious activity immediately.

Key takeaway: Theft and fraud are crimes and will not be tolerated. When team members steal or commit fraud in their work for Boomi, it damages our brand and tarnishes us all.

f. We Prevent Money Laundering and Terrorist Financing

We abide by all laws designed to deter criminal enterprise and protect the national security of the countries where we do business. Money laundering is the process by which funds generated from criminal activity such as drug trafficking are moved through legitimate businesses in order to hide their criminal origin. Terrorist financing refers to funding for terrorist activities and can come from legitimate or criminal sources. You must never knowingly facilitate either money laundering or terrorist financing, and you must take steps to prevent inadvertent use of Boomi’ business activities for these purposes. You must be vigilant and exercise good judgment when dealing with customers or business partners. Know who they are, what kind of business they are in, and follow the applicable procurement and contracting processes and policies to support our due diligence and decisions. Immediately report any unusual or suspicious activities or transactions such as attempted payment in cash or from an unusual financing source, arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer, unusually complex deals that don’t reflect a real business purpose or attempts to evade record-keeping or reporting requirements.

Key takeaway: Boomi takes steps to prevent illegal use of its business activities for money laundering and terrorist financing by identifying our customers, their business activity, and the origin of their funds, and by reporting suspicious transactions.

g. We Travel and Expense Responsibly

Boomi funds may only be used for legitimate business purposes. You must follow company policies regarding expense limits, the use of corporate credit cards, preferred travel vendors, necessary management approvals, receipts, expense reports and other travel-related matters. You are expected to record travel and hospitality expenses truthfully, accurately, and completely.

Reimbursement expense claims must be honest and accurate. We never use Boomi funds for personal travel or entertainment, or to supplement personal income. While engaged in Boomi business, you should not go to places that would negatively reflect on Boomi, or that are not in alignment with our values, such as a sexually-oriented business. Expenses incurred at these establishments will not be reimbursed. These venues are not acceptable for business entertainment even if expenses are not submitted for reimbursement.
We avoid distracted driving. If employees need to use their phones for work purposes while driving, they must pull over safely to the side of the road or another safe location or use a “hands-free” device unless prohibited by applicable law. Reading or sending text messages while driving is strictly prohibited. All employees must follow the law, and employees who are charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions.

Key takeaway: Team members are expected to act in compliance with policies, and to record travel and hospitality expenses truthfully, accurately, and completely.

6) Integrity

We believe integrity must always govern our fierce desire to win. Being a responsible corporate citizen helps us inspire trust among our customers and other stakeholders and motivates team members to make the right choices for our business, our communities, and our planet.

a. We Avoid Conflicts of Interest

You must avoid any activity or personal interest that creates or appears to create a conflict between your interests and the interests of Boomi or that might impair, or appear to impair, your ability to perform work objectively and effectively.

Common areas of conflicts of interest:

- Personal relationships: You should not be involved in any employment-related decisions — such as hiring, compensation, evaluation, or promotion — regarding a family member or someone with whom you have a romantic relationship.
- Outside employment, business ventures, and investments: Secondary employment, outside business ventures, or other commercial or financial activities must not take away from your responsibilities to Boomi. You must never engage in any outside employment or other activity that competes with Boomi, violates your confidentiality or other obligations to Boomi, or that is illegal, immoral, or would otherwise reflect negatively on Boomi.
- Contracting: We always select vendors and business partners who will serve Boomi’s best interests. You must not participate in any decisions relating to current or potential business relationships between Boomi and your secondary employer, personal business ventures, or entities in which you or a relative has a significant financial investment or serve in a governance position.

Key takeaway: A team member’s activities can, intentionally or unintentionally, create a conflict of interest or an appearance of impropriety.

b. We Give and Accept Gifts and Hospitality Appropriately

Reasonable gifts, hospitality, and other business courtesies may be appropriate to foster goodwill but should never be used to influence your or a customer’s business decision or undermine the integrity of our business relationships.
Accepting Gifts: Although nominal gifts and business courtesies (but never cash or cash equivalents) are acceptable under certain limited circumstances, you must never solicit or accept tangible or intangible personal benefits of any kind that are given — expressly or implied — in exchange for securing Boomi business or providing favorable business terms, or that might create or give the appearance of creating a sense of obligation on your or Boomi’ part with regard to the giver. We never accept gifts or hospitality that are illegal, immoral or would reflect negatively on Boomi.

Giving Gifts: Gifts may only be given as appropriate business courtesies to enhance relationships and never to inappropriately influence business decisions. When appropriate to give gifts, you should only offer gifts and hospitality to partners, customers, or other third parties for legitimate business purposes and when the gift, hospitality or business courtesy is reasonable in amount, in good taste and in accordance with any applicable Boomi policies. Gifts, hospitality, and business courtesies may never be in the form of cash or cash equivalents and may only be given to those individuals who are permitted to accept the gift under the laws and policies applicable to them.

More restrictive rules often apply when giving gifts to certain types of customers, like officials or employees of governmental or quasi-governmental entities which can include certain healthcare, utility, or education customers. Always follow the most restrictive rules applicable.

Key takeaway: Gifts and hospitality must be given and received in a responsible manner and may never be used to influence a business decision.

c. We Engage in Charitable Causes

Boomi is proud of our team members’ generous spirit and encourages you to volunteer your time, talents and energy to support charitable causes and non-profit organizations, provided they do not conflict with Boomi’ interests or reflect negatively on Boomi. The use of Boomi resources for charitable activities, as well as time off for both Boomi sponsored community involvement programs and personal charitable activities, must adhere to applicable laws. You may receive requests for Boomi to make a charitable contribution. Whether the request involves donations of money, services, software, event sponsorship or anything else of value, all charitable contributions must be in compliance with applicable laws.

Key takeaway: Boomi makes charitable contributions consistent with our giving goals and encourage team members to support their communities through appropriate volunteer activities.

d. We Support Political Activity

You are encouraged to be a responsible citizen and participate in civic and political activities, as appropriate in your home country and community, provided your activities are lawful and respectful. Activities must be conducted on your own time and at your own expense. Boomi funds or assets, including facilities, equipment, or trademarks may not be used in connection with personal political activities or interests.
Do not give the impression that Boomi supports or endorses any candidate, campaign, or policy issue with which you are personally involved. Follow all laws as they relate to the ability of corporations and individuals to make political contributions or engage in lobbying or other government communications and political campaign activities. Boomi does not make corporate political contributions, even when legal to do so.

**Key takeaway:** Team members must not communicate with public officials regarding Boomi-related policy matters or claim to represent Boomi with policy makers except as authorized or directed by the CEO or COO after identifying the matter and reviewing with the Legal Department.

e. We Raise Issues and Concerns

If you know of or suspect a violation of applicable laws or regulations, of this Code or any policy, or suspect unethical, illegal or suspicious behavior, you should promptly report it. There are many ways for you to ask questions or raise concerns:

- your leader;
- a member of management;
- Human Resources;
- Legal Department; or
- Ethics Helpline via telephone or online via the Ethicsline.

Boomi does not tolerate retaliation against anyone who reports suspected misconduct or assists with an investigation or audit in good faith. If you think you are being retaliated against, or that an investigation is being conducted inappropriately, you should report it immediately using any of the reporting avenues listed above.

Federal law also protects employees against reprisal if the employee discloses to certain government officials or Boomi information that the employee reasonably believes evidences gross misconduct, a violation of law related to a US Government contract, or other matters covered by federal whistleblower protections. See, e.g., F.A.R. 52.203-17; and FAR Subpart 3.9 – Whistleblower Protections for Contractor Employees (https://www.acquisition.gov/far/3.908-3).

**Key takeaway:** If you know of or are concerned about a violation of applicable laws or regulations, this Code or any policy, please promptly report it.

f. We Investigate and Address Concerns

Legal is responsible for overseeing internal investigations into suspected ethics and compliance-related misconduct, under this Code and related policies and standards; the Legal team may involve appropriate additional persons including, for example, outside counsel or Human Resources. You must not interfere in internal investigations or engage in your own fact-finding. Rather, you should promptly raise ethics and compliance questions and cooperate fully in any company authorized internal investigation. All investigations and any resulting corrective action will be conducted in compliance with local law, applicable Boomi policies and standards and any required workers’ representative consultation requirements. You are expected to cooperate in internal investigations, audits, accounting reviews or directions from Boomi’ lawyers in connection with lawsuits or government proceedings. Boomi takes all reasonable efforts to keep information related to an investigation confidential and you must keep investigation information confidential.
and not share such information beyond the investigation team unless specifically authorized in writing.

Retaliating against any Boomi team member for reporting an ethics issue or participation in an authorized company investigation is strictly prohibited and will not be tolerated. Team members engaging in such retaliatory behavior will be subject to discipline, up to and including termination.

**Key takeaway:** All investigations and any resulting corrective action will be conducted in compliance with local law, and applicable Boomi policies and standards.

7) **Final Thoughts & Additional Resources**

Thank you for taking the time to read Boomi’s Code of Conduct and committing yourself to legal and ethical behavior in all you do at and for Boomi.

If you have questions about a Code provision or how a law or policy may apply to you in your job, if you are unclear about a particular course of action, or if you wish to report a potential legal or ethical violation or suspicious behavior, you should use one of the many resources that are available to you for assistance. Employees should use the option with which they are most comfortable and which is most appropriate under the circumstances, including:

- Your manager or a member of management
- The Legal Department, Chief Financial Officer or Chief Accounting Officer, or Human Resources Department
- Boomi’s toll-free, third party operated telephone and web-based Ethics and Compliance Helpline at 1-800-513-7270 for anonymous and non-anonymous reporting. Please view ethics.boomi.com for international numbers, if needed.

Acting legally and ethically is the right thing to do. It’s good for Boomi. And it’s good for you.

Any waiver of any provision of this Code of Conduct for an executive officer must be approved in writing by the Chief Executive Officer after review with the Chief Legal Officer and head of Human Resources. Any waiver of any provision of this Code of Conduct with respect to any other employee, contingent workers or independent contractors must be approved in writing by our Chief Legal Officer and disclosed to the head of Human Resources and the CEO or COO.

This Code of Conduct is subject to modification from time to time, as the Boomi team is committed to always improving and to modernizing and revising our policies and practices.