



# WORKING AT GRANICUS

## UK EMPLOYEE HANDBOOK

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# INTRODUCTION

The Employee Handbook sets out the main policies, procedures and information related to working with Granicus-Firmstep Limited (also referred to as Granicus, or the Company), along with any specified supplements.

Unless otherwise stated, the information within this Handbook applies to all UK employees of Granicus-Firmstep Ltd. In the event that information in this Handbook conflicts with an employee's Contract of Employment, the Contract will usually take precedence.

All employees will be given an electronic copy of this Handbook at the beginning of their employment with Granicus. After that time a copy will be available on Confluence. It is important that employees read the Handbook carefully and familiarise themselves with the information contained within the Handbook, to ensure safety, and compliance throughout employment.

Any questions relating to the Handbook should be directed to a line manager or a member of the Human Resources team.

Over time, Granicus may amend and update the Handbook and the policies therein as required. Employees will be notified of any changes in writing.

## JOINING THE ORGANISATION

### INDUCTION

Upon joining Granicus-Firmstep Ltd employees will be provided with an onboarding plan. This will set out guidance for their first days and useful information about Granicus, its policies and procedures, and details of relevant training the employee will need to complete. During onboarding employees will be introduced to Company procedures, products, and systems of work. Employees will be required to complete various mandatory training courses, including Health & Safety, IT Security (ISO27001), Anti-Slavery and Confidentiality, in a timely manner, as well as reviewing and agreeing to Granicus policies.

### PROBATIONARY PERIOD

New starters join Granicus on a 3 month Probationary Period. Further details can be found in the employee's Contract of Employment.

### PRE-EMPLOYMENT CHECKS

Upon being offered a role, Granicus will arrange various pre-employment checks. These checks include, but are not limited to, verification of employment history, verification of qualifications, verification of Right to Work in the United Kingdom and a DBS check. Verification of an employee's Right to Work in the U.K. must be completed prior to, or on the employee's first day of employment, and copies of documents provided. These will be

stored securely by the Human Resources team in line with local law. Should it not be possible to successfully complete all background checks prior to an employee's start date, any outstanding checks must be completed in full before the employee's Probationary Period is completed.

## CRIMINAL CHECKS

Due to the nature of work, many posts within Granicus are exempt from the provisions of Section 4(2) of the Rehabilitation of Offenders Act 1974, by virtue of the Exceptions Order 1975 as amended. For exempt roles, all convictions, including those that are "spent" under the terms of the Rehabilitation of Offenders Act 1974, but excluding those that are "protected" under the Exceptions Order, must be made known to us. Criminal record checks are carried out at the commencement of employment. Any convictions that occur during employment must be notified to the Human Resources team. This includes convictions in a court of law, police cautions, reprimands, and final warnings.

## VETTING & BARRING

Upon joining Granicus, it will be a requirement as part of an employee's onboarding process, to check their name does not appear on the Children's List or the Adults' List maintained by the DBS as being barred from working with children or vulnerable groups. Checks are repeated cyclically, on either an 18 month, or 5-year basis, dependent on role. In addition, if we believe that an employee is guilty of misconduct that has harmed or placed a child or a member of a vulnerable group at risk of harm, Granicus has a statutory duty to refer the employee's name to the DBS for possible inclusion on the Children's List or the Adult's List. This duty also applies in relation to ex-employees. Any convictions that occur during employment must be notified to the Human Resources team.

## ABSENCE FROM WORK

### HOLIDAY / PAID TIME OFF (PTO)

#### Annual Entitlement

Annual entitlements are set out within the Contract of Employment, usually in accordance with the table below:

<b>Years of Service</b>	<b>Annual Days Holiday</b>	<b>Monthly Accrual</b>
0-1 year	22 days	1.83 days
1-4 years	25 days	2.08 days
5+ years	28 days	2.33 days

During periods of approved PTO employees will be paid their normal rate of pay.

In addition to annual entitlement, employees are entitled to take and be paid for recognised Public/Bank Holidays each year, typically:

- New Years' Day
- Good Friday
- Easter Monday
- Early May Bank Holiday
- Late May Bank Holiday
- August Bank Holiday
- Christmas Day
- Boxing Day, or such other days as may be substituted

## Carry Over

Employees may carry forward up to five days into the next holiday year. An employee can find their outstanding balance in the Time Management section of the HR system. Any entitlement carried forward must be used by 1<sup>st</sup> May or it will be lost.

## Making a Request

PTO must be agreed in advance with an employee's line manager and a request submitted and approved in the HR system.

Where possible, a minimum of one months' notice for one week of leave, and one weeks' notice for a single day should be given. If this is not possible for any reason, employees should discuss the request with their line manager at the earliest available opportunity. Prior to commencing a period of PTO, the employee should organise and communicate an appropriate hand over of any ongoing work, with their line manager.

Under normal circumstances, PTO should not exceed two consecutive weeks.

Should an employee require PTO in excess of two weeks, they should discuss the reasons with their line manager in advance. Where Granicus can accommodate such requests, the employee's Executive member may approve an extended period of leave as an exception.

In the event that a request for PTO cannot be approved due to business needs, Granicus is not responsible for any financial commitment made by an employee prior to authorisation. Employees are therefore advised not to book any travel or accommodation until a holiday request has been authorised.

## Making Adjustments

As a new starter, or leaver, an employee's PTO entitlement will be pro-rated based on the number of months worked that holiday year, using the table above. When leaving the business, if an employee has taken more PTO than has been accrued, the difference will be deducted from their final pay. Similarly, if an employee has accrued entitlement remaining, the outstanding balance will be paid with their final payment.

# SICKNESS

## Medical Appointments

Medical appointments should be arranged outside normal working hours wherever possible. Where this is not possible any appointments that do occur during working time should be kept to a minimum and a line manager must be notified in advance.

Depending on the length and timing of the appointment, an employee should make arrangements with their line manager, to make up the time or take leave from their annual entitlement.

## Reporting Sickness

If an employee is absent from work without prior authorisation they must contact their line manager, or Human Resources as soon as possible on the first day of absence, by telephone, email, direct message, or text message. The employee will be asked to provide a reason for absence and provide an estimate of when they expect to be able to return. Should an employee's direct line manager be in a different time zone, the employee should also make a local manager or member of the Human Resources team aware of their absence. Should an employee be unable to report an absence themselves, a family member or contact should do this on their behalf. Where absence continues beyond one day, the employee must continue to report the absence daily, unless signed off by a Doctor for a specified period of time. During periods of long-term absence contact should be made each day during the first week and weekly thereafter, unless agreed otherwise. Should an employee be absent from work without any contact, Granicus will attempt to contact them and their nominated emergency contact. If no contact has been made after 3 days' absence Granicus will consider the employee AWOL and revert to the Disciplinary process.

## Providing a Fit Note

Employees are able to self-certify for up to one week/seven calendar days.

If an employee's sickness extends beyond one week, they must provide a doctor's medical certificate or fit note. During periods of continued absence due to sickness or injury an employee must continue to provide certification covering the entire period of absence to show eligibility for Company Sick Pay and/or Statutory Sick Pay.

## Returning to Work

Upon returning to work, employees will be offered a Return to Work check in with their line manager, to ensure they are fit to recommence normal duties and to discuss any additional support that may be required. Granicus will endeavour to make reasonable adjustments to assist with an employee's recovery and ongoing health.

After a period of long-term sickness, usually exceeding three weeks, or in certain circumstances, it may be appropriate to agree to a phased return. As each situation is



different, this will be discussed and agreed on a case-by-case basis. Employees returning from long-term sickness absences may be required to re-take mandatory training.

## Statutory Sick Pay (SSP)

Granicus is responsible for paying Statutory Sick Pay (SSP) to all eligible employees. SSP is usually payable for up to 28 weeks, as specified by law, from the fourth day of absence. An eligible employee will be paid the current rate of SSP for any qualifying days which they would normally have worked, except for the first three days of absence, which are known as 'waiting days'. Employees will only be paid for 'waiting days' where they have already received SSP during a linked period of absence within the last 8 weeks, which included a three-day waiting period.

Any SSP due will be paid using the normal payroll and will be subject to usual Payroll deductions. If an employee is not eligible for SSP, Granicus will inform them as soon as possible.

## Company Sick Pay

Granicus offers an enhanced Sick Pay scheme which is paid in tandem with SSP, on the condition that sick pay rules within the Employee Handbook are met.

The scheme provides up to 10 days Company Sick Pay, at your normal basic rate, in each calendar year. Company Sick Pay is inclusive of any SSP owed. Employees within their Probationary Period are not eligible for Company Sick Pay. Any Company Sick Pay is inclusive of Statutory Sick Pay (SSP) where this is due. If you exhaust your entitlement to Company Sick Pay, Granicus will continue to pay SSP for as long as you are entitled to it. Once Company Sick Pay is exhausted, pay will revert to SSP only until the next calendar year begins. Employees must return to work for any new Company Sick Pay entitlement to become available. Should an employee receive any compensation or damages relating to a period of illness or injury, then any payments which have been made due to the absence in question will be treated as a loan and must be repaid, up to an amount not exceeding the amount of compensation or damages received.

# MANAGING ABSENCE

All sickness absence must be recorded in the HR system. Granicus will regularly review the attendance levels of all employees. High levels of sickness absence, or a pattern of sickness absence that gives rise to concern, will be discussed with you to understand the reasons and ascertain whether further support can be provided. Granicus may require a detailed medical report, in which case consent will be requested to contact a GP or medical practitioner. If it is deemed that further action is required in respect of high absence levels, Granicus will follow the Disciplinary process.

# ARMY & RESERVIST LEAVE

Granicus will allow unpaid time off for employees who are in the Reserve Forces or Territorial Army for training, or if they are called up for military service. Reservists called for active duty will be placed on unpaid leave for the period of mobilisation. During this time their employment status, job and continuity of service will be protected in accordance with UK legislation. After mobilisation ends, the Reservist must notify Granicus within 3 weeks of their full-time service ending, to request reinstatement and agree a return-to-work date. Employees returning from a period of long-term leave may be required to re-take mandatory training.

# BEREAVEMENT

In the unfortunate event that an employee experiences the death of someone close to them, support can be sought from their line manager or Human Resources in the first instance. Granicus may grant Bereavement leave on the following basis:

<b>Days</b>	<b>Relation</b>
Up to 10	Spouse or partner, child, other relation considered to be a dependent
Up to 5	Parent, sibling, other relative considered to be close family
Up to 3	Grandparent, aunt, uncle, other relative considered to be extended family

If an employee requires further support, they should speak with the Human Resources team. In the event of an unexpected issue or family problem, an employee should reach out to their manager or Human Resources to discuss further support options.

# JURY SERVICE & COURT APPEARANCES

If an employee is summoned for Jury service, or to appear as a court witness, they must notify the Human Resources team and their Line Manager as soon as possible.

Employees will be granted leave for the duration of Jury Service. Upon attending court, an employee will be able to claim loss of earnings directly from the court, by completing their paperwork. Once payment has been received, the employee must notify the Human Resources team so any court payment can be recovered from your next available pay run.

# OTHER PUBLIC DUTIES

Granicus will allow reasonable time off, without pay, for other Public Duties in line with UK regulations. Please discuss any requests with your line manager or Human Resources ahead of time.

# VOLUNTEERING

Granicus appreciates the importance of charity organisations within the local community. Where possible, Granicus will encourage employees to support them. Employees are entitled to up to 2 days unpaid leave per year to act as a volunteer or undertake other charitable work. Employees can choose to use their volunteering time to support a charity or community group of their own choice, or to take up an opportunity provided by Granicus. Time off for volunteering must be agreed with an employee's line manager and Human Resources ahead of time and details of the registered charity provided.

# UNPAID LEAVE

Should an employee require planned time off after exhausting any PTO entitlement, they should discuss this with their line manager or the Human Resources team. Where it is not practical to make time up, unpaid time off may be granted for short periods and pay adjusted accordingly.

# FAMILY LEAVE

As an inclusive organisation, Granicus is pleased to offer Family leave benefits in excess of statutory minimums. These policies may be subject to change from time to time. Please speak to Human Resources for information and to plan any period of leave under the following category:

- Maternity Leave
- Partner Leave
- Adoption Leave
- Fostering Leave
- Shared Parental Leave
- Parental Leave
- Emergency Time Off for Dependents

# COMPANY PROCEDURES

## PAY DATES

Payment will be made in 12 monthly instalments directly into an employee's bank or building society, on or before the 25<sup>th</sup> of each month. If a pay date falls on a holiday or weekend, payment will be made on the preceding working day. Employees will be provided with digital documentation detailing any payment and deductions made at the relevant intervals, including payslips and P60s. Upon leaving Granicus, final payment will be made on the soonest available pay date and a P45 will be made available at the soonest opportunity after that date.

## OVERPAYMENTS

If an employee is over or under paid, they must notify their manager, or Human Resources as soon as possible. Any errors will be corrected at the next available opportunity. Granicus may deduct from an employee's salary, or require payment from the employee, of any money due to Granicus including, but not limited to: money paid in error, advances, PTO or sick pay over your entitlement, cycle to work loan, pay relating to time not worked, personal expenses or the cost of any Company property lost or damaged by you deliberately or as a result of employee negligence. Where money is owed, Granicus will usually confirm this in writing, and if necessary, provide repayment options so as not to cause hardship.

## COMPANY PROPERTY

Employees are responsible for any company equipment issued to them or ordered by them. If loss or damage occurs that is deemed to be due to employee negligence, after an investigation, Granicus reserves the right to deduct all or part of any replacement costs from the employee's salary.

## EXPENSE REIMBURSEMENTS

Granicus will reimburse employees for reasonable expenses incurred whilst travelling on business or engaged in Granicus related entertainment. All expenses must be submitted to finance via the expense system, along with receipts and within 60 days of incurring the cost. All expenses must be approved by your Manager, including those made using Company credit cards. Reimbursement of approved expenses will be added to the next available pay run after approval.

This information is only a summary. For full details and guidelines employees should refer to the Granicus Global Expense Reimbursement Policy on Confluence.

## BENEFITS REIMBURSEMENTS

For full details regarding reimbursements relating to Employee benefits such as Fitness, Eyecare or seasonal Flu Vaccinations please refer to the HR Help section on UKG, or ask the Human Resources team.

## FLEXIBLE WORKING

Employees at Granicus have a statutory right to request variation to their Terms and Conditions of Employment from day 1 of employment.

A request for a variation must relate to:

- Hours of work
- Time of working hours
- Normal place of work (e.g. at home or at any place of business operated by

Granicus)

An employee should submit a request in writing to their line manager or a member of the Human Resources team, detailing the following information:

- The date of the request
- A statement that it is a statutory request to change Terms and Conditions of Employment
- The variation being requested in details
- The proposed commencement date
- A statement saying if and when they've made a previous application - include the date of the previous request

Upon receipt of a formal request, Granicus will arrange a meeting to discuss the request in more detail. An employee can make up to two requests within any 12-month period for their contract of employment to be varied. Under normal circumstances, should Granicus be able to grant a request, the variation will be a permanent change to the employee's Terms and Conditions of Employment and should be communicated to the employee within 2 months from the request being raised, unless agreed otherwise with the employee. In some situations, it may be suitable to agree requests on a trial basis in order for the employee and Granicus to review the impact over time. Should Granicus disagree with the request, they must tell the employee giving the business reasons for the refusal.

## PERFORMANCE

After completion of the Probationary Period, performance and personal development will be assessed continuously through feedback, 1:1s and the annual performance review cycle. Employees will meet with their manager for a formal end-of-year performance review once per year, and informally agree regular check points in a cadence to suit the level of support required their role. Should an employee's performance fall below expected standards, their manager will work with them to define development goals and support progress informally first. If underperformance continues and more formal action is required, the employee may be placed on a Performance Improvement Plan (PIP) to support and document their development. If unsuccessful, a PIP may lead to disciplinary action as per the process detailed below.

## REMOTE WORKING

Granicus' Global Remote Working Policy (the Policy) applies to employees of all Granicus subsidiaries and affiliates (Granicus). The Policy also applies to third party consultants and contractors working on behalf of Granicus, subject to the terms of the Third-Party Consultants and Contractors section below.

In all cases remote working should be achieved without adverse effect on the overall efficiency and effectiveness of teams, functions, customers, and the business as a whole. Any remote working arrangements require close cooperation within teams and our broader business to ensure we continue serving Granicus customers and their audiences.

For the purposes of this Policy 'work location' or 'location of record' refers to the registered Granicus office recorded on an employee's employment documentation, or to their home address as registered with Granicus.

## Granicus Employees

The Policy is intended to provide flexibility for Granicus employees by providing the freedom to work from home instead of a Granicus office, where possible. It is recognized that due to the breadth of roles across Granicus, some employees may be required to work in their assigned Granicus office on a regular basis; or attend their Granicus office when requested in order to facilitate business activities e.g., customer meetings, QBRs.

In some instances, an employee may wish to permanently or temporarily relocate to a different state, county or country. Whilst Granicus aims to be flexible, it may not always be feasible. Any request to work from another location must be approved in advance by the relevant Executive and Human Resources. Requests must be submitted in writing, outlining how the employee's work and/or Granicus customers will not be impacted by the move and whether it is feasible based on local laws and regulations (such as employment, tax and workplace health and safety (WHS)).

In the event a request for relocation is granted, Granicus will not provide the employee relocation support, sponsorship, or financial support. If the request is denied, it is expected that the employee will remain in the original location. Failure to do so will be deemed a voluntary resignation.

## Employees joining Granicus via a merger or acquisition

Granicus understands that arrangements and policies may be in place within legacy organizations prior to an acquisition. During integration, Granicus' intention will be to align newly joining employees to this Policy. In the event legacy arrangements fall outside the Policy, Human Resources will work with the relevant Executive, managers, employees and integration leads to agree on an arrangement which is aligned with the Policy while ensuring optimal customer outcomes and business results. While Granicus aims to be flexible, continuation of existing arrangements cannot be guaranteed.

## Third-Party Consultants and Contractors

Where possible, third-party consultants, contractors, solo practitioners and/or sole traders providing services to Granicus should be situated in a location where Granicus has an established entity, and in which they have the legal right to work.

Exceptions may be granted on a case-by-case basis where there is a compelling business reason, provided that the location's official travel advisory status is considered no higher than a Level 2\*. Any exception must be approved in advance by the relevant Executive and Human Resources.

## **Requests to Work Outside Employees' Location of Record and Basis of Decisions**

Any request to work from another state, county or country (including working while traveling internationally) must be put in writing to your immediate manager and Human Resources within a reasonable timeframe to enable a decision to be made. Employees must ensure requests have been approved by Human Resources before travel arrangements are made. Only 1 request per year will be approved, unless there are extenuating circumstances. Exceptions will require approval by the relevant Executive.

When determining the feasibility of the request, the following factors will be taken into consideration:

- The current work location
- Employment, tax, WHS, privacy laws and regulations in both the country of employment and visiting / transferring country
- Customer and commercial agreements that may include location restrictions
- Whether Granicus has an established office in a location
- The nature of the employee's role
- Length of time of the move i.e., permanent or temporary
- Does the employee have the right-to-work in the future location
- The distance between the existing Granicus location and the new location
- Commercial impact on business (i.e. increase in cost of work travel expenses)
- Demonstrated performance and the impact of the relocation on future performance

In addition to the above, temporary or permanent international relocation will also be subject to the following considerations:

- Any applicable security threats associated with working from the future country
- Tenure in role, e.g., is a probationary period being served
- Does Granicus have a legal entity in the future location

Employees must obtain written approval from Granicus prior to travelling in the form of a Working Travel Agreement. Failure to do so may result in disciplinary action.

*\*Refers to the Travel Advisory status as published on <https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories.html/>*

## **DISCIPLINARY**

The purpose of this disciplinary procedure is to provide a framework for Granicus to resolve issues relating to an employee's conduct, attendance, or performance in a fair, equitable and consistent way. The procedure is designed to help and encourage all employees to achieve and maintain expected standards and should be looked upon as a corrective process. Where appropriate, Granicus will try to resolve issues through informal means first, before resorting to the formal disciplinary procedure. Disciplinary action will only be taken after a full investigation of the facts.

When following the formal disciplinary procedure, employees have the following rights:

- to be informed of the allegation/s against them,
- to be given reasonable notice of the date and time of a Disciplinary hearing

- to be accompanied at a disciplinary hearing by a work colleague or trade union official,
- to appeal against any disciplinary outcome

If disciplinary action is deemed necessary, the employee will be invited to a disciplinary hearing where they will be asked to make their case and given the opportunity to offer a satisfactory explanation. A hearing manager will review any evidence, investigation notes, witness statements and the employee's comments before deciding on an outcome. If necessary, an employee may be suspended on normal pay during the disciplinary procedure. During a period of suspension, the employee must make themselves available for a scheduled disciplinary hearing during their normal working hours.

### Potential Disciplinary Outcomes:

Outcome	Warning active for
No Further Action	N/a
Written Warning	12 months
Final Written Warning	12 months
Dismissal	N/a

The disciplinary hearing manager will decide an appropriate outcome in conjunction with Human Resources. Outcomes will depend on the severity of the allegation and will consider other disciplinary action within the previous 12 months and existing warnings on file. If the misconduct is deemed extremely serious, but not sufficiently serious to justify immediate dismissal, a final written warning will be issued. An employee will be notified in writing, prior to a hearing, if there is potential that the hearing could result in their dismissal. Following a disciplinary hearing, the employee will be provided with a record of the discussion, the hearing outcome and details of the appeal process as soon as possible. If the outcome is dismissal, the employee will also be provided with the reasons for dismissal, the date on which employment will terminate and details of final payment, as soon as is reasonably practicable. Granicus reserves the right to vary the disciplinary procedure dependent on the seriousness of the matter in hand, or if the employee has a short amount of service. It also reserves the right to call on a third party to assist with the disciplinary process where appropriate. Granicus reserves the right to deduct from pay the cost of any damage or loss to property or goods, which after a Disciplinary hearing was found to have been caused by an employee's negligence or vandalism.

### Gross Misconduct

Gross misconduct will result in summary dismissal without notice or pay in lieu of notice. The following lists the type of offences normally regarded as gross misconduct (This list is not exhaustive):

- Deliberate failure to comply with the published rules of Granicus, including those covering cash handling, security, health and safety, equal opportunities, the Internet, etc.
- Deliberate falsification of records
- The committing of offences against current discrimination legislation whilst acting on



behalf of Granicus

- Fighting or assaulting another person
- Using threatening or offensive language towards customers or other employees.
- Making yourself unfit to work by solvent abuse, drinking alcohol, taking of illegal substances, or failing to follow medical instructions on prescribed drugs
- Being in unauthorised possession of Company property
- Being in possession of illegal drugs and substances whilst on Company premises
- Being unable to work due to use of illegal drugs and substances
- Obscene behaviour
- Behaviour likely to bring Granicus into disrepute
- Willful and deliberate damage to or misuse of Company property
- Refusal to carry out reasonable duties or instructions
- Conviction on a criminal charge that is relevant to your employment with Granicus
- The misuse including use for personal gain, of confidential information in the course of working for Granicus
- Undertaking private work on the premises without permission
- Deliberate failure to comply with Granicus' workplace and information security policies as outlined within this Handbook and your Contract of Employment
- Continued or serious underperformance against Granicus' expectations

## Disciplinary Appeal

An employee will be given the right of appeal at each stage of the disciplinary procedure. Should an employee wish to exercise their right of appeal, this must be put in writing to the nominated individual, within five days of receiving a disciplinary outcome letter. The appeal notification must detail the reasons why the employee feels the decision is unfair, or inappropriate in relation to the matters addressed at the disciplinary hearing. If an employee has any new information or evidence to support their appeal, this information should also be included. Granicus will investigate any additional information and schedule an appeal hearing. An employee will be given reasonable notice of an appeal hearing and will again be entitled to be accompanied at the hearing by a work colleague or trade union official. Although the purpose of an appeal is to review any disciplinary penalty imposed, it cannot increase the disciplinary penalty. A decision made at Appeal will be final.

# GRIEVANCE

Granicus grievance procedure is intended to enable all employees to raise any issues relating to their work. Granicus will endeavour to resolve an employee grievance informally at first through discussion, however, should an employee wish to raise a grievance formally, it should be done in the following way. An employee should submit a formal written grievance to their line manager, or the Human Resources team. Granicus will acknowledge receipt of a formal grievance and meet with you to begin investigating the matters raised as quickly as possible. Should an employee feel they need help in putting their point of view across, they may be accompanied to a grievance meeting by a work colleague or trade union official. Following thorough investigation of a formal grievance, Granicus will provide an employee with written confirmation of the outcome. If the employee is not satisfied with the outcome of their grievance, they will have the option to take the matter further by raising an appeal. An appeal should be submitted with five working days of receiving written confirmation of the grievance decision, to the named individual. It should include an explanation of why an employee is dissatisfied with the original decision. Every effort will be made to hear an appeal within five working days. Although Granicus will always be willing to try to resolve your grievance as amicably as possible, a decision reached at the appeal stage will be final. Please note that Granicus reserves the right to call on a third party to assist in resolving grievances.

# HARASSMENT & BULLYING

Granicus will not tolerate any form of harassment or bullying.

The purpose of this policy is to inform employees of the type of behaviour that is totally unacceptable and to explain what solutions there are to employees who may suffer harassment or bullying.

Granicus intends to provide an inclusive working environment in which no individual feels threatened or intimidated.

Harassment is a discriminatory act and is also a criminal offence. It is very difficult to define as it can take many forms, but in the main it takes the form of unwanted behaviour by one employee towards another, for example:

- Patronising or belittling comments
- Comments about appearance/body/clothes
- Leering or staring at a person's body
- Unwelcome sexual invitations or pressure
- Promises or threats, concerning employment or conditions, in exchange for sexual favours
- Displaying offensive or sexually explicit material
- Touching, caressing, hugging or indecent assault
- Bullying is also difficult to define. Obvious examples are:
  - Threats of or actual physical violence
  - Unpleasant or over repeated jokes about a person
  - Unfair or impractical work loading

If an employee encounters a problem of this nature, it is vital that they make the person responsible aware that his/her remarks or conduct are offensive to them. This should be done in a simple, straightforward way.

It is recognised that complaints of harassment or bullying are often of a sensitive or worrying nature and that it may be difficult to speak directly to the other employee involved. If this is the case, if the informal approach fails, or if an employee believes that the harassment or bullying is of a very serious nature, they must bring the matter to the attention of a manager or the Human Resources team. If possible, they should keep notes of the harassment or bullying so that the formal complaint can be investigated, including the date, time, and whereabouts of the act.

If a formal complaint is made, it will be dealt with under the grievance procedure and all possible actions will be taken to separate the employee from the alleged harasser or bully. An employee bringing complaint of harassment or bullying must not be victimised for having brought the complaint. Following a full investigation, if Granicus has grounds to believe that the complaint was brought with malicious intent, the employee will be subject to disciplinary action under the Granicus disciplinary procedure.

The Granicus appeal procedures apply to appeals against decisions made under the equal opportunities and discrimination policy and the harassment policy.

## WHISTLEBLOWING

Employees and workers who make public disclosures, generally about wrong doings in the workplace, are commonly referred to as “whistleblowers”. Under certain circumstances “whistleblowers” are protected under legislation for disclosing information that is known as “qualifying”.

A qualifying disclosure must relate to:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage
- concealing any information relating to the above

All employees are legally protected if they make a qualifying disclosure relating to any of the above points. Any employee wishing to make a disclosure is strongly recommended to raise the issue to their line manager or to the Human Resources team in the first instance. Alternatively, should an employee feel unable to report an issue directly, they are able to do so confidentially via a third-party anonymous reporting line, EthicsPoint by NAVEX.

EthicsPoint is a comprehensive and confidential reporting tool that enables Granicus to address policy violations, while cultivating a positive work environment. Reports can be raised online or by phone using the details below.

Online: [www.Granicus.EthicsPoint.com](http://www.Granicus.EthicsPoint.com)

By phone: Dial access number 0800 890011, then dial 833-547-0144

FAQ: <https://secure.ethicspoint.com/domain/media/en/gui/75510/faq.pdf>

Granicus takes reports extremely seriously and will follow-up on reports made through the system confidentially and in a timely manner.

## LAY OFFS & SHORT TIME WORKING

If a situation arises where there is a reduction of work, or there is any other occurrence that affects the normal running of the business, Granicus has a right to either lay off without pay other than Statutory Guarantee Pay, or implement shorter working hours. This procedure is in line with employees' terms and conditions of employment.

Granicus reserves the right to select the employees best suited to carry out whatever work is available. Employees will be offered alternative work wherever possible. Employees who are laid off must still be available for work as and when necessary, as continuity of service is not affected by any period of lay off. Granicus will pay Statutory Guarantee Pay in accordance with the current government regulations. Any employee who is laid off for longer than the Statutory Guarantee Pay period will be given a letter to take to the relevant government agency. Employees should then be able to sign on as temporarily unemployed, even though they will still be employed by Granicus.

## REDUNDANCY

In the unfortunate event that Granicus needs to consider making redundancies, reasonable steps will be taken to prevent any compulsory redundancies.

Should compulsory redundancy become necessary, employees will be notified formally and engaged in a consultation process to discuss selection criteria, any alternative positions, and be given every opportunity to put forward any views of their own. The length of any such consultation period will vary dependent on the number of employees at risk and will be in line with current legal guidelines. Following consultation, any resulting redundancies will attract Statutory Redundancy payments in addition to the individual's contractual notice and benefits. Granicus reserves the right to reject voluntary redundancy applications if it believes that the volunteer has skills and experience that need to be retained for the future viability of the business. Any employee who is made redundant will be given the right to appeal, within 5 working days of receiving a Redundancy confirmation letter. They should submit an appeal in writing to the nominated individual.

## RESIGNATION

Details of notice periods can be found within the Contract of Employment. Employees are required to submit written confirmation of their resignation and the date in which they intend to finish working. The Human Resources team will liaise with any leaver to confirm any outstanding PTO, details of final payments and treatment of employee benefits. Upon leaving Granicus employees will be invited to an exit interview to discuss their time with Granicus, reasons for leaving, and obtain relevant feedback.

Upon termination of employment, employees must return all Granicus property in their possession or for which they have responsibility. Failure to return all such items will result in the cost of the unreturned items being deducted from any final payments owed. This is an express written term of employees' contract of employment.

## CODES OF PRACTICE

### GRANICUS CODE OF ETHICS AND CONDUCT

The Granicus Code of Ethics and Conduct ("Code") includes standards and policies that must always be observed by you when acting on behalf of Granicus or any of its subsidiaries and affiliates. It is important that you know and understand the policies and standards contained in this Code as well as all other Granicus policies and procedures. For the avoidance of doubt, compliance with this Handbook and all Granicus policies and procedures is mandatory and includes during all work-related events, work-related travel or otherwise.

Granicus is dedicated to supporting our customers and conducting business ethically and with integrity. We sell our platform solutions and services directly and indirectly to federal, state and local public sector entities, as well as to commercial entities. This Code is our roadmap for doing business the right way. Put simply, we do business the right way when we act ethically and consistently with the core value of integrity, the Handbook, the Code, our policies and all applicable laws. Although no document can address every decision you could face during your career with Granicus, this Code will help guide you. Employees must contact Human Resources for assistance with any questions about this Code or the Legal Department regarding corporate ethics and compliance generally.

This Code applies to all officers, directors, employees, and agents acting on behalf of Granicus. We are each personally responsible for acting within the letter and spirit of the law and upholding this Code. Supervisory personnel are also responsible for ensuring that this Code is understood and enforced within their departments.

Violations of this Code, including, subject to applicable law, failures to report potential violations by others, may result in adverse disciplinary actions, including termination of employment. If you believe in good faith that a violation of this Code has occurred, we encourage you to discuss the issue with (1) your supervisor, (2) an appropriate Human Resources representative or (3) the Legal Department.

Granicus Personnel may also raise concerns or questions regarding the Code or make good faith complaints or reports at any time through the confidential online NAVEX EthicsPoint Help Line (see Anonymous Reporting section below for additional details).

Retaliation for raising a concern under this Code in good faith or for participating in an investigation into any such concerns is strictly prohibited. Retaliation is a serious violation of the Code and should be reported immediately through the channels discussed above.

Any terms not defined in this Code shall have the meanings attributed to them in the Handbook.

## Anti-Harassment and Anti-Discrimination

Granicus is committed to maintaining a work environment that is free from discrimination and harassment, including unlawfully intimidating, hostile, or offensive conduct. Harassment and other inappropriate conduct that is based on, or is directed toward someone because of race, colour, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital or familial status, status with regard to public assistance, military or veteran status, or any other status protected by applicable law, is against Granicus's policy and will not be permitted or tolerated. All forms of electronic communication (such as email and Internet use) are covered by this policy in the same manner as other communications and actions.

### **Prohibited Conduct**

Prohibited conduct includes verbal, written, visual, or physical conduct that (1) relates to another person's race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status, status with regard to public assistance, familial status, military or veteran status, or any other status protected by applicable law or (2) is directed toward another person because of that person's race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status or familial, status with regard to public assistance, military or veteran status, or any other status protected by applicable law, where such conduct may have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. Prohibited conduct may include, among other things, telling racist or sexist jokes or making offensive or derogatory remarks about another person's race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status, status with regard to public assistance, familial status, military or veteran status, or any other status protected by applicable law. Prohibited conduct also includes sexual harassment as discussed below. Discrimination and harassment are prohibited whether it is committed by supervisors, co-workers, or non-employees, including vendors, suppliers, customers and clients. Employees must not engage in prohibited conduct against other Granicus employees or personnel of Granicus's vendors, suppliers, customers and clients.

### **Sexual Harassment**

Prohibited conduct includes, but is not limited to, conduct that may constitute or lead to sexual harassment, such as: use of suggestive sexual comments, jokes, or innuendo; persistent, unwanted flirtation or invitations for dates or other social activities; unwelcome sexual advances or passes; sexual remarks or questions about a person's body, clothing, or sexual activities; patting, pinching, or other offensive touching; or displays of sexually suggestive pictures or objects. Sexually harassing conduct may include conduct between persons of the same gender, regardless of the sexual orientation of those persons.

## **Consequences**

Conduct deemed contradictory to the beliefs and expectations outlined in this Code is damaging to fellow employees and to Granicus as a whole, and as such, Granicus has a zero-tolerance policy for behavior contradictory to this Code. Those who are found to be non-compliant and/or those found to have engaged in discrimination, harassment, bullying, hate speech, retaliation, and/or any other non-inclusive behavior, will be subject to disciplinary action, up to and including termination of employment. Granicus recognizes that certain of its activities are governed by applicable laws or other regulations. Nothing in this Code or the Handbook is intended to interfere or conflict with the Granicus compliance with legal requirements or regulations.

## **Reporting Inappropriate Conduct**

If an employee or contractor believes that they, or any other employee, contractor, or other partner of Granicus has been subjected to conduct prohibited by this Code or other Granicus policies, they are required to report it immediately. Granicus may ask that complaints be put in writing to facilitate the investigation process. In addition, for employees who are comfortable doing so, telling the person who is engaging in inappropriate behavior to stop is often the most effective way to stop objectionable behavior. Reports can be made to any Granicus manager, HR Generalist, member of the HR leadership team, or through NAVEX EthicsPoint anonymous reporting. We encourage reports to be as detailed as possible and to include all relevant information needed to follow-up on the claim appropriately. Supervisors who become aware of any incidents or alleged incidents of possible discrimination, harassment, or bullying are required to immediately report these directly to Human Resources. Supervisors who receive complaints of possible discrimination or harassment must consult Human Resources before undertaking an investigation or other action (except for any action to stop any currently occurring behavior). Any supervisor who fails to report allegations of discrimination, harassment, or other prohibited conduct or who otherwise fails to deal properly with such allegations may be subject to discipline, up to and including termination of employment.

Granicus takes allegations of harassment, discrimination, and bullying incredibly seriously and will promptly and thoroughly investigate all allegations made in good faith. Based upon its investigation, Granicus will take swift and appropriate corrective action. Any employee found to have engaged in discrimination, harassment, or other prohibited conduct will be subject to appropriate discipline or corrective action, up to and including termination of employment. Appropriate steps will also be taken if any non-employee (such as contractors/consultants, suppliers, customers, and clients) are found to have discriminated against or harassed any employee of Granicus. Reports of discrimination or harassment will be kept confidential to the extent possible, consistent with the need for a thorough investigation.

Granicus will not retaliate or take any form of reprisal against any victim of or witness to discrimination or harassment, and any such retaliation or reprisal by a Granicus employee is prohibited. Any employee who retaliates against another employee or witness because of a complaint of discrimination or harassment, or because of participation in any



investigation, will be subject to appropriate discipline or corrective action, up to and including termination of employment.

### **Anonymous Reporting**

As a part of our commitment to Diversity, Equity, and Inclusion, Granicus' anonymous reporting line through EthicsPoint is available for employees who prefer to report policy violations anonymously. The primary route for reporting concerns should otherwise still be to speak with a member of the Human Resource Generalist or Business Partner team, or your direct manager. Granicus works hard to create an environment where employees can disclose concerns in a safe space. It allows HR the opportunity to ask questions and complete a more thorough investigation, however, for those whom are uncomfortable reporting issues in this manner, EthicsPoint serves as another reporting option. The EthicsPoint system is completely confidential and is managed through Navex Global. Reports made through EthicsPoint are sent to select members of HR or Legal and will be investigated in the same manner as those made through primary channels. Reports should include enough information for the HR team to follow-up on the report and complete an investigation.

Reports can be made via Granicus' dedicated hotline or via the web intake form

Online: [www.Granicus.EthicsPoint.com](http://www.Granicus.EthicsPoint.com)

By phone: Dial access number 0800 890011, then dial 833-547-0144

FAQ: <https://secure.ethicspoint.com/domain/media/en/gui/75510/faq.pdf>

In the event insufficient details are provided, the HR team will request additional information. Because no personal information is retained in EthicsPoint, it is the responsibility of the reporter to take note of and use their report key and password to check the system for updates.

## **Electronic Communications**

All employees are required to review and acknowledge receipt of Granicus's Acceptable Use Policy. Use of Granicus computers, telephones, voicemail, email, Internet and other electronic communications is to support Granicus's business. It is the responsibility of each employee to ensure that all Granicus technology is used for proper business purposes, in a responsible manner and does not compromise confidential, proprietary or other sensitive information. Employees who have learned of electronic communications inconsistent with these requirements must immediately notify Human Resources. Violations may result in disciplinary action, up to and including termination of employment.

Employees do not have a personal privacy right in any matter created, received, sent, accessed, or stored on any Granicus computer, telephone, voicemail, email or Internet connection, application or otherwise. Designating a matter as private or confidential or the existence of passwords and "message delete" functions does not restrict or eliminate Granicus's ability or right to access electronic communications. Granicus monitors its computer, telephone, voicemail and email systems and Internet connection and, at any time and without prior notice, may record telephone calls, listen to voicemail, and read and



copy any and all files or data contained therein (including, but not limited to, email messages and personal file directories). Notwithstanding the foregoing, Granicus will do so only in accordance with all applicable laws. Granicus maintains full access to all electronic communication systems for the purpose of assuring compliance with legal requirements as well as internal policies, supporting the performance of internal investigations, and assisting with the management of Granicus's information systems.

All use of electronic communications must conform to the same standards of propriety and respect as any other verbal or written business communications. Demeaning, harassing, or defamatory communications, messages or postings, or any other electronic communications inconsistent with or in violation of Granicus policies, are prohibited.

### **Computer Systems In General**

Computer resources are assets of Granicus and are to be protected from unauthorized access, modification, destruction, theft, or disclosure. An active or unlocked computer should not be left unattended for any extended period of time, such as, for example, overnight or while the user is otherwise away from the office or other location where the computer is being used for any period of time. Individual passwords for computers are confidential and may not be shared or posted. If a user's password is learned by someone else, the password should be changed immediately. Each user is responsible for activity performed using the user's password. No user should attempt to obtain access to another user's files or other information without prior authorization.

### **Email Usage**

The principal purpose of electronic mail ("email") is to facilitate business communications among Granicus employees and with its customers, vendors and partners. Email should not be used to solicit outside business ventures or for any political or religious purpose, unless approved in advance by Granicus. Email that contains information considered confidential or proprietary to Granicus must be treated as confidential in accordance with Granicus's policy regarding Protection of Confidential Information. Except with respect to Granicus's management and monitoring of information systems, no employee may share email passwords with another employee, provide email access to an unauthorized person, or access another user's email without authorization.

### **Internet Access And Usage**

Granicus's connection to the Internet is principally for work-related purposes. Limited non-work-related use of Granicus's Internet is permitted so long as such use is minimal and does not impact performance or violate any of Granicus's policies or work rules. Any unauthorized use of the Internet is prohibited. Unauthorized uses include, but are not limited to, posting, viewing, downloading, or otherwise transmitting or receiving offensive, defamatory, pornographic, or sexually explicit material; engaging in computer "hacking" or other related activities; or attempting to disable or compromise the security of information on any computer.

## Social Media Use

Granicus supports employees' active participation in social media and online communications. The term "social media" includes, but is not limited to, any of the following venues:

- Social networking sites (e.g. LinkedIn, GovLoop, Facebook, Plaxo, Hi5, etc.)
- Social sharing sites (e.g. YouTube, SlideShare, Flickr, Twitch, etc.)
- Forums and discussion boards
- Wikis
- Blogs
- Micro blogging (e.g. Twitter, identi.ca, Jaiku, etc.)
- Social bookmarking sites (e.g. Digg, StumbleUpon, Reddit, Pinterest, etc.)
- Review sites (e.g. Epinions, Angie's List, Yelp, ChoiceVendor, etc.)
- Internal social media (e.g. Salesforce Chatter, Slack, Teams)

These guidelines apply to official use of social media on behalf of Granicus as well as personal use.

- Employees are expected to be respectful and use good judgment. Remember that what you post or publish may be public information for a long time.
- Employees should not misuse Granicus's time and resources. Your personal use of social media should not interfere with your responsibilities at Granicus. The Granicus computer resources are to be used primarily for business purposes.
- Employees must not make unauthorized statements on behalf of Granicus. Unless authorized to place content on social media on behalf of Granicus, content placed on social media regarding Granicus or its management, employees, customers, competitors or vendors must be free of any impression that the views expressed are anything more than personal opinion; in other words, such content must make clear that it does not represent the views of Granicus. Unless a posting is authorized to be made on behalf of Granicus, postings that disclose an employee's association with Granicus should include a disclaimer stating that any opinions expressed are the employee's own and do not represent those of Granicus.
- Use of social media may not conflict with or violate any of Granicus's existing policies including, but not limited to, the policies on harassment, discrimination, this Code, and Violence-Free Workplace.
- Employees must not use or disclose confidential or proprietary information. Use of social media may not conflict with Granicus's Protection of Confidential Information policy.

## Outside Employment

Employees are permitted to engage in outside work or hold other jobs, subject to certain restrictions. Activities and conduct away from the job must not compete with, conflict with, or compromise Granicus' interests or adversely affect job performance and the ability to fulfill all responsibilities to Granicus. Employees are prohibited from performing any services for customers on nonworking time that are normally performed by Granicus. This prohibition also extends to the unauthorized use of any Granicus tools or equipment and the unauthorized use or application of any confidential information. In addition, employees are

not to solicit or conduct any outside business during paid working time. Employees are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or different hours. If Granicus determines that an employee's outside work interferes with the employee's performance or the ability to meet the requirements of Granicus, as modified from time to time, such employee may be asked to terminate the outside employment if the employee wishes to remain employed with Granicus.

## Solicitation and Distribution

Employees may engage in fundraising solicitation on Granicus premises only during their nonworking time. Nonworking time means time during meals or breaks and before or after work. Employees may distribute or circulate noncompany written materials only during nonworking time and only in non-work areas. If an employee is not certain whether an area is a work or non-work area, they should consult Human Resources for clarification. Solicitation or distribution in any way connected with the sale of any goods or services for profit is strictly prohibited anywhere on Granicus property at any time. Similarly, solicitation or distribution of literature for any purpose by non-employees is strictly prohibited on Granicus's property at any time.

## Relationships In The Workplace

Granicus respects the right of all individuals to develop and engage in personal relationships with others they work with at Granicus. As long as a personal relationship with another Granicus employee is consensual and does not give rise to favoritism, create any conflict of interest or the appearance of one, such relationships are permitted. Any close relationship that can have a real or perceived conflict of interest between two Granicus employees must be disclosed to Human Resources. Personal relationships between an employee who has a supervisory role with respect to the other employee or is otherwise in a position to affect the other employee's compensation, benefits, performance or career advancement are expressly prohibited.

### **Employment Of Relatives**

If a relative of a Granicus employee is being considered for any position, it is expected that the relationship is disclosed to Human Resources for prior approval and that if the relative is hired it does not create real or perceived conflicts of interest. Such conflicts of interest typically exist where one relative works in a supervisory role of the other or otherwise is in a position to affect the other employee's compensation, benefits, performance, career advancement, or exert influence or authority over the employee's work direction. If such situations develop, Granicus' HR department will determine whether the situation poses an actual or potential conflict of interest and if it can be properly mitigated.

## WORKING WITH CUSTOMERS

- Granicus must always compete fairly and follow the rules applicable to government competitions or as otherwise set forth by commercial customers.

- We will not seek or obtain competitors' non-public proprietary information or government sensitive information relating to a procurement.
- We promote open and fair competitions for all subcontractors and suppliers.
- We strive to create opportunities for small businesses, including those owned by women, minorities, and military veterans.
- We never solicit or accept improper payments from subcontractors and suppliers.
- We respect diversity and promote equal opportunity.
- We strictly comply with the specifications, requirements, and terms and conditions of all contracts.
- We keep complete and accurate records.

## ANTI-BRIBERY & ANTI-CORRUPTION

Granicus is committed to conducting business in an honest and ethical manner and complying with all laws and regulations applicable to anti-bribery, anti-corruption, gifts, hospitality, political and charitable contributions, and sponsorships in its worldwide operations. Employees must comply with all applicable anti-bribery laws and anti-corruption regulations, including but not limited to, the U.S. False Claims Act, the U.S. Anti-Kickback Act of 1986, the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act of 2010, and similar legislation in other jurisdictions where Granicus conducts business. Employees should be aware that not only their national laws, but potentially also extra-territorial laws may apply.

Granicus will conduct its business with customers with integrity, fairness and openness. All Granicus business transactions with the government must be free from even the perception that favorable treatment was sought or received in exchange for any bribes or gifts. A bribe is something of value given with the intent to influence an official act, such as awarding a contract to Granicus.

Granicus strictly prohibits all bribery and corruption, whether made for the benefit of, or received from, any third party, public or private. No employee shall, directly or indirectly, promise, authorize, offer or pay anything of value (including gifts, hospitality, political and charitable contributions and sponsorships) to any government official or other party to improperly obtain or retain business or otherwise secure an undue advantage. Conduct that is improper if performed directly is also improper if performed indirectly. Employees must not make, authorize or facilitate a payment if they believe it likely that bribery will occur.

### **THE FOLLOWING CONDUCT IS EXPRESSLY PROHIBITED:**

- Providing or offering to provide anything of value, such as a gratuity, favor, discount, entertainment, hospitality, loan, forbearance, training or other item of monetary value to a government employee in order to influence that employee's official action.
- Offering a gift or free attendance at a conference or other meeting (that charges an entry fee for general admission) without first seeking approval from the Legal Department.
- Offering a gift of free travel to a government employee without first seeking approval from the Legal Department.
- Offering bribes of any kind, whether to government employees or business partners.
- Paying "kickbacks" or making improper payments in association with government business.

- Making payments to a company or individual that are solely contingent on Granicus receiving government business.
- Paying back-end rebates, referral or influence fees or other consideration that is not transparent to the government and could be perceived as an improper attempt to influence government business.
- Accepting or soliciting gifts, loans, travel, meals, or other benefits from third parties that could affect an employee's objectivity and professional judgment.

## Global Trade Compliance

Granicus' global reach demands that we exercise appropriate due diligence as to the third parties with which we do business and that we comply with all international laws regulating trade, as well as all export control and import laws and regulations that govern the exportation and importation of commodities and technical data. Granicus understands that the rules vary depending on the type of goods, technology, or services being exported or imported and the intended destination. These laws are complex and can change quickly as governments address new political or security issues. Engage the Legal Department for assistance with export and import matters.

The U.S. and other countries where we do business use embargoes and sanctions to further foreign policy and national security objectives. These embargoes and sanctions prohibit or severely restrict our direct or indirect dealings with certain countries. They may also restrict our dealings with individuals or with companies controlled by the government. You are responsible for obtaining a review of any transaction involving any country subject to U.S. or U.S.- approved embargoes or sanctions to determine whether applicable laws prohibit the proposed transaction. In addition, all transactions must be screened to ensure that they do not involve any prohibited parties, destinations, or end-uses.

You must work with the Legal Department to ensure all vendors and contractors are in compliance with all applicable laws and regulations. In addition, Granicus complies with applicable laws that prohibit cooperating in economic boycotts of certain other countries. We are required to report to the U.S. government the receipt of any requests to support such boycotts or to provide information to verify compliance with such boycotts. Therefore, if you believe you have received a boycott request or have any questions about boycott activities, it is important that you notify the Legal Department immediately.

## CONFLICTS OF INTEREST

### Personal

Employees must never use their positions with Granicus, or any of its customers, partners or others for private gain, to advance personal interests or to obtain favors or benefits for themselves, members of their families or any other individuals, companies or business entities. Employees of Granicus must conduct their personal affairs such that their duties and responsibilities to Granicus are not jeopardized or legal questions do not arise with respect to their association or work with Granicus. If any employee or relative has a significant ownership in a firm with which Granicus does business, or if an employee has any influence on transactions involving purchases, contracts, or leases, the employee must

immediately disclose to Human Resources and the Legal Department the existence of any actual or potential conflicts of interest.

### **Personal – Government Employees**

Government employees are prohibited from engaging in any activity that constitutes a personal conflict of interest. Granicus will not put government employees in a situation in which their responsibilities to the government (including their objectivity and judgment) are compromised by an outside transaction or relationship.

## **Organisational**

Employees must avoid putting Granicus in a position of an organisational conflict of interest. The government has organisational conflict of interest rules that are intended to prevent the existence of conflicting roles that might bias the contractor's judgment or advice and to prevent unfair competitive advantages. For example, for U.S. Federal government opportunities, a contractor generally cannot draft Request for Proposal ("RFP") specifications for the government and then participate in the resulting competition for a government contract that is based on those RFP specifications. Also, a contractor that is hired by the government to provide objective consulting advice generally cannot recommend that the government purchase the contractor's own products.

## **Government Post-Employment "Revolving Door" Restrictions**

Granicus respects the obligations of current and former government employees. Granicus understands that individuals are free to move in and out of government service and that individuals with prior government experience can bring great value to Granicus. However, Granicus understand that restrictions limit our ability to conduct employment discussions with current government employees and that other restrictions limit the ability of former government employees to perform certain functions after leaving the government.

Employment discussions between Granicus employees and current government employees are subject to several strict limitations. The general focus of these restrictions is to avoid the appearance of a "conflict of interest." Granicus will not negotiate employment with a government employee while that employee is participating in a matter involving Granicus. Granicus employees must consult with Human Resources and the Legal Department prior to negotiating or entering into an employment relationship with current and former government employees.

Some former government employees are subject to a lifetime ban on appearing before their former government agencies on matters where they were personally and substantially involved, as well as a two-year ban covering matters within their official responsibility. Granicus employees, including former government personnel, will coordinate with HR and the Legal Department to determine which activities former government personnel are restricted from supporting. Hiring managers are expected to know that certain limitations may apply to the activities the employee would be able to perform before the employee joins Granicus.

# GIFTS

A "gift" is defined as anything with a fair market value.

## Government Employees and Officials (Granicus Customers)

Depending on the jurisdiction, gifts of a nominal value may be provided occasionally, to the extent an active or imminent procurement decision is not pending with the recipient. Gifts with more than a nominal value are prohibited without obtaining prior Legal Department approval. Certain states and local jurisdictions may require the provider of a gift to register as a lobbyist. In addition to lobbying registration, compliance with training requirements and reporting obligations is mandatory. The best practice is no gifts.

## Partners

The rules for Partners acting as prime contractors, such as a Granicus channel partner who has the contractual relationship directly with the customer, or those who are in a position to provide impartial advice to the Government are the same as the rules for Government Employees and Officials.

## Third Parties and Gifts Received by Granicus Employees

Third parties include employees of non-government entities other than Partners in the category above. Gifts, favors, casual entertainment of reasonable value (defined as less than \$50) or promotional materials such as pens, pencils, note pads, calendars, etc., may be accepted when they meet general standards of ethical business conduct, involve no element of concealment, and are accepted on a reciprocal basis where no obligation remains. Any employee who is uncertain as to whether a gift, favor or other item offered or given to the employee is acceptable should contact the Legal Department. Employees are also responsible for reporting any questionable activity to their supervisor, Human Resources and the Legal Department.

## Charitable Donations and Political Contributions

Any charitable donations on behalf of Granicus, must be approved in advance by the CEO and the General Counsel. Political contributions on behalf of Granicus are strongly discouraged. In rare circumstances, a political contribution may be made on Granicus's behalf, if approved by the CEO and the General Counsel.

# DRESS CODE

Granicus' dress code is a reflection of our values and culture. While our style is relaxed, we do recognise awareness of our surroundings remains an important cornerstone in how we present ourselves to our customers, colleagues, prospects and candidates.

As a company our dress code is *"dress for your day. Be comfortable without making others uncomfortable. Use good judgement."*



## Bringing the Granicus Dress Code to Life

When thinking what to wear for work, consider the following:

- Who are you meeting throughout your day? Are they internal only, external or blended?
- If you're meeting people, what is the purpose and intended outcome?
- What is the nature of your interactions? Are you heading into a formal situation or an informal situation?
- Will your attire help build strong rapport with those you engage?
- How will you engage with people? Virtual, or in-person?
- Are you in public representing Granicus – e.g., trade meetings/fairs, work social events, visiting customers?
- What impression do you want the other person to walk away with?

## Stipulated Attire

Some employees may on occasion be required to wear a specific style of attire for certain events and situations. Examples of these situations can include awards and ceremonies, board meetings, sales meetings and marketing events.

## Brand Ambassador

Your attire and surroundings while on video calls are all a reflection of Granicus. Please keep in mind the audience, their working environment and the overall impression that you want to present. Government employees tend to work in a more professional and/or conservative work environment and often want to see that reflected in the vendors that support them. When interacting with customers, your appearance should lean towards being professional, neutral and non-distracting. When considering what is “professional attire” we encourage people to be authentic to themselves while presenting a neat, presentable and trustworthy outward appearance. Further, when in public representing Granicus, it is expected you will continue to dress in a manner that reflects and respects Granicus' values, your co-workers and the customers we represent.

## EQUAL OPPORTUNITY

Granicus is committed to providing equal employment opportunities. All qualified applicants and employees will be considered for employment and advancement without regard to race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status, status with regard to public assistance, familial status, military or veteran status or any other status protected by applicable law. This policy applies to all employment practices and terms and conditions of employment, including but not limited to promotions, transfers, compensation, terminations, training and participation in Granicus sponsored benefits or programs. Employees should raise any concerns they might have regarding possible discrimination in accordance with the complaint procedure



described below. No retaliation against anyone who in good faith brings forth a complaint of possible discrimination will be permitted or tolerated.

## COMMITMENT TO DIVERSITY

Here at Granicus, we acknowledge, value, and respect the differences between us. We embrace, support, and celebrate our employee differences in race, skin color, ethnicity, age, gender identity or expression, sexual orientation, religion, ability, language, nationality, national origin, family or marital status, socio-economic class, political affiliation, military service, and other unique characteristics. The Diversity, Equity, and Inclusion (“DE&I”) policy establishes the principles and requirements by which Granicus will enhance DE&I throughout the organization. The policy applies to all Granicus subsidiaries and affiliates, which include employees, contractors, and anyone else who performs work on behalf of Granicus.

### Our Commitment

At Granicus, our mission is to bring governments and their constituents closer together. This truly starts from inside, with our Granicus team. Granicus is committed to cultivating and preserving a diverse, inclusive, and equitable environment for all employees. We value and rely on the differences that Granicans bring to the table and their unique ability to bring the diversity of thought and perspectives that drive the company's success. Granicus' diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs, layoffs, terminations, and the ongoing development of a work environment built on the premise of equity. As an ongoing effort, Granicus will:

#### **Recruit Diverse Talent**

Granicus should be as diverse as our customers and their residents. Granicus will be intentional about recruiting diverse talent. We will diversify talent pools and candidate outreach channels to attract candidates of various backgrounds and experiences.

#### **Create a Sense of Belonging**

We want all employees to feel as though they have a place here at Granicus. We want to create and maintain an environment where employees can be at work as their authentic selves and feel that they are valued and respected for who they are, without judgment.

#### **Grow and Succeed**

Our internal processes must be equitable to give all employees equal access to opportunities. Equal access should result in diversity at all levels of the organization. Granicus will create and sustain an environment where all employees have equal access to opportunities based on merit and performance, uninhibited by identity or characteristics. Granicus' processes and policies should reflect our intentionality to create a welcoming environment for all, and diversity should be reflected in all levels of the organization as a consequence.

## Diversity, Equity, and Inclusion Vision

The Granicus DE&I Vision is not only to benefit from a diverse workforce, but to have a community of employees whose differences are valued, respected and celebrated, that serves to attract more diversity and preserve existing diversity. We strive to eliminate harmful bias and prejudices that negatively impact the overall employee experience, prevent employees from performing at their best, and limit Granicus' potential.

## Diversity, Equity, and Inclusion Mission

At Granicus, we believe that diversity fosters the innovation and creativity we need to meet our full potential. We commit to creating an inclusive culture that respects everyone, which is reflected in every internal and external interaction. We value individuality and want every employee to feel they belong at Granicus.

Granicus is dedicated to making diversity, equity, and inclusion more than just words, benchmarks, or a trend. With open hearts and minds, Granicus strives to embed these principles in our operating fabric as a business, as a partner to the public sector, as a technology leader, and as a contemporary corporate citizen.

## General Responsibilities

Everyone at Granicus is responsible for treating all others with dignity and respect in all situations. Because of Granicus' reputation as a trusted government partner, discriminatory behaviour from any subsidiary or affiliate will have a negative impact on Granicus as a whole; therefore everyone has the responsibility to behave responsibly in their daily lives, inside and outside of Granicus, including on social media, by respecting the differences of others and increasing personal awareness of bias, microaggressions, and other potentially harmful conduct that may hinder Granicus' ability to be more inclusive and equitable. Collectively, it is a shared responsibility to not engage in harassment or discrimination, including as outlined in our harassment and discrimination policies, or bullying of any kind, as this would create a toxic environment for others to live in their authenticity.

## Manager Responsibilities

Managers are responsible for additional obligations beyond the general responsibilities outlined above. Managers are encouraged to lead by example in creating an inclusive workplace. Managers should value the diverse input of their team members and promote collaboration amongst the team. The performance and development of team members are reliant on the mentorship, leadership, and guidance from management; therefore, Granicus requires managers to make decisions free from discrimination and bias. This includes, but is not limited to hiring, performance management, promotion, termination and compensation decisions. Managers must work closely with HR to provide reasonable accommodations for qualified individuals as outlined in company policy. Managers must also appropriately address team behavior that is inconsistent with this and/or other Granicus policies.

## Executive Responsibilities

Additionally, executives are further responsible to create and foster a diverse, inclusive, and equitable environment. It is an executive responsibility to uphold this policy to the highest degree in all decision making. Executives are urged to hold themselves to the highest standard in their interactions with others. Executives should actively recommend ways to drive diversity, equity, and inclusion at Granicus. An inclusive mindset must be brought to each interaction and strategic project implemented at Granicus.

Guidance and strategy should be broached with consideration for the immediate and lasting impact on diversity at Granicus.

## HEALTH & SAFETY

Granicus will comply with all applicable Health and Safety regulations and make efforts to reduce the possibility of workplace accidents. Any employee who has concerns about safety within the work environment is strongly encouraged to report them to their line manager or Human Resources.

Any employee who sustains an illness or injury, that could require medical attention, while on the job, should report the injury or illness to their manager or Human Resources immediately. Granicus will provide an accident form to complete, recording details of the incident. The form contains questions about what happened so that a full investigation can be conducted, and any appropriate parties notified. If you are a witness to an injury, you may begin filling out the report to be completed by your injured co-worker.

Employees are required to take reasonable care of their own well-being and that of all other employees. The relevant health and safety notices are posted around the premises and employees are expected to be familiar with their requirements.

If you are suffering from an infectious or contagious disease or illness such as rubella or hepatitis you must not report for work without clearance from your doctor. Contact with any person suffering from an infectious or contagious disease must be reported before commencing work.

More detailed Health and safety information can be found in the Granicus Health and Safety handbook.

## Drugs & Alcohol

Granicus is dedicated to maintaining a drug-free workplace. Granicus recognizes that drug and irresponsible alcohol use in the workplace can have serious consequences in terms of safety, security, and productivity. For this reason, Granicus prohibits the following activities while working, while on Granicus property (including parking facilities), and while operating or occupying Granicus equipment, machinery, or vehicles:

- Use, consumption, or possession of marijuana or illegal drugs
- Any use of alcohol while operating Granicus vehicles, or being under the influence of alcohol, marijuana or illegal drugs while operating or occupying Granicus equipment, machinery, or vehicles
- Any other irresponsible use of alcohol
- Buying, selling, offering, or receiving marijuana, or illegal drugs

- Reporting to work or working while under the influence of alcohol, marijuana, or illegal drugs
- Electronic cigarettes or tobacco use in any form outside of designated outdoor smoking areas

For purposes of this policy, "illegal drugs" includes but is not limited to legal drugs that were not legally obtained or that were used for purposes other than the purpose for which they were prescribed.

Granicus recognizes that from time to time it may authorize alcohol to be served at certain functions and that some employees may hold positions where alcohol may be consumed under certain limited circumstances, such as a business function, meeting and/or business-related meal or entertainment activity. No employee is required or urged to drink alcohol at any such function or as a part of the employee's job. Whether or not an employee decides to do so is the employee's own personal choice. Any employee who drinks alcohol at a Granicus-sponsored function or business-related event may not drive home while impaired by alcohol.

Granicus encourages any employee who may have an alcohol or drug-related problem to contact the Employee Assistance Program or seek other professional assistance. Granicus will support any employee desiring assistance. Employees, however, should seek help before the dependency affects their job performance. While drug or alcohol dependency itself is not grounds for discipline or termination of employment, any work problems resulting from such use or dependency will be dealt with as any other work-related problem and may be cause for discipline or discharge.

Any drug or alcohol testing program that may be implemented by Granicus will be addressed in a separate Drug and/or Alcohol Testing Policy.

### **Testing for Illegal Substances & Alcohol**

Granicus reserves the right to introduce testing, including random testing, for illegal substances and alcohol, to be carried out by either a trained employee or third party supplier.

Any refusal to be tested will be regarded as a refusal to carry out a reasonable instruction and will normally result in dismissal.

## **Smoking**

It is illegal to smoke in enclosed or substantially enclosed workplaces and Granicus has a policy that prohibits smoking, the use of electronic cigarettes, and of tobacco use in any form throughout the entire workplace with no exceptions. This policy applies to all employees and to visitors to the premises.

Failure to comply with this policy will result in disciplinary action and possible criminal prosecution.

## PERSONAL PROPERTY

Compensation for damage to or loss of personal possessions will only be considered if Granicus can be held to have been negligent. All damage or loss should be reported to a manager or Human Resources immediately.

Where there is evidence that the accident or loss occurred through lack of care on the employee's part, compensation will not normally be paid, and the employee should check whether a claim could be made on their personal insurance policy to cover such circumstances.

Employees are advised not to leave any personal possessions or valuables unattended on the premises.

## USING PRIVATE VEHICLES ON COMPANY BUSINESS

The use of your own vehicle for Company business requires authorisation. Once authorised, you may claim a mileage allowance providing Granicus has agreed the travel in advance. Mileage allowance is paid at the relevant HMRC rate and covers the cost of fuel, and wear and tear for business use.

You must have a valid licence to drive the vehicle and you are responsible for ensuring that your vehicle is in a roadworthy condition, with a valid MOT certificate (if applicable) and current vehicle tax, and that you have adequate insurance cover in place before undertaking any business travel. Granicus will not accept any liability in the event of an accident, prosecution or fine.

You must provide Human Resources with a scanned copy of your current MOT certificate and car insurance and ensure these documents are updated every time they are renewed. Please note, Granicus does not endorse the use of mobile phones whilst driving. This includes the use of hands-free kits as accidents despite using these legal devices can be liable for prosecution.

Any fines or prosecutions arising from any motoring offence either moving or static will be your responsibility.

## INFORMATION & SECURITY

### GDPR/EMPLOYEE PRIVACY POLICY

Granicus LLC ("Granicus" or "Company") is committed to maintaining your trust by protecting your personal data. This Privacy Policy is drafted based on local laws and legislation that considers our mutual rights and explains our practices for the collection, use, and other processing of employee personal data.

Granicus is a "data controller". This means that we are responsible for deciding how we hold and use personal data about you.

This is the latest version of this Privacy Policy. Nothing in this Privacy Policy shall be deemed to constitute a contract of employment nor shall it form part of any potential subsequent contract of employment you may be given. Granicus may amend this Privacy Policy from time to time by updating this page.

## Contacting us

If you have any questions about this Privacy Policy or questions/complaints about the processing of your personal data by Granicus, please contact:

Carrie Cisek, Chief Human Resources Officer  
408 St. Peter Street, Suite 600  
St. Paul, MN 55102, USA  
01 651-757-4114  
[hr@granicus.com](mailto:hr@granicus.com)

If using the contact information above does not sufficiently resolve your complaint, you can also contact our Data Protection Officer or our EU representative.

Data Protection Officer  
408 St. Peter Street, Suite 600  
St. Paul, MN 55102, USA  
01 651-400-8730  
[dpo@granicus.com](mailto:dpo@granicus.com)

Name of EU representative: DataRep

Email address: [granicus@datarep.com](mailto:granicus@datarep.com)

You can also contact DataRep using this online form:

<https://www.datarep.com/data-request>

Postal address: The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland

## What personal data does Granicus collect, and for what purposes?

As an employee of Granicus, we must collect some information. Normally, you will supply us with a Curriculum Vitae or Resume when you begin employment, and we will collect further information during your employment, such as when you apply for a training course, update us about a change to your circumstances, or when monitoring your performance, etc.

Categories of personal data that Granicus will process include:

- Identification data such as name, gender, date of birth
- Contact details such as phone, address, email, emergency contact details
- National identifiers such as national insurance number, passport, driving license, social security number, immigration and visa status
- Spouse, beneficiary & dependents information, marital status, or veteran status where required
- Compensation and benefit information such as salary, pension, benefits elections

- Payroll information such as banking details, tax information
- Health information including any disabilities, medical conditions, or sickness records where locally required
- Employment details such as employee agreement/contracts, performance reviews, disciplinary/grievance records, training information, absence records
- Information provided during the recruitment process
- Race or ethnicity details
- Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organization; you will be notified separately if this is to occur)
- Criminal records information, including the results of Disclosure and Barring Service (DBS) checks
- IT information— information about your use of our IT, communication and other systems, and other monitoring information. Information required to provide access to Granicus IT systems and networks such as IP addresses, log files, login information, software/hardware inventories
- Your image, in photographic and video form

You will provide some of this information to us through various information collection forms and software applications; others are collected during your employment activities, such as when you log on to our IT systems.

We will use your personal data for the following purposes:

- Staff administration
- Employment contracts
- Providing staff benefits
- Exercising legal rights
- Performance management and training
- Expense management
- Employee recognition
- Employee engagement survey
- Monitoring the use of IT systems

This information is necessary for the employment contract with Granicus, to fulfil legal obligations we have, to protect your health or wellbeing, or where it is in our legitimate interests to do so without encroaching on your privacy rights.

We will try and give you choices where possible, but in most cases if you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We may collect this information from you, your manager, your personnel records, the Home Office, pension administrators, your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators, the DBS, other employees, consultants and other professionals we may engage, e.g. to advise us generally and/or in relation to any grievance, conduct appraisal or performance review procedure, door entry systems, swipe card systems, application logs, keystrokes and mouse movements, screen capture, application logs, webcams, automated monitoring of our websites and

other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records data loss prevention tools, next-generation firewalls, unified threat management systems, transport layer security, eDiscovery technology, mobile device management systems, relevant websites and applications.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

## How do we use sensitive Personal Data?

Some data is known as "special category data". This is particularly sensitive personal data that requires higher levels of protection.

- We will use information about your physical or mental health or disability status to ensure your health and safety in the workplace, comply with employment laws, to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence, and to administer benefits.
- Where locally required, we may use information about your race, national or ethnic origin, religious, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

This information is collected where necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment.

## Will computers or people make decisions?

We may use automated systems that identify behaviours and activities based on certain criteria we decide, such as monitoring the use of our IT networks, or selecting employees with skills. If we do so, we will set out the logic behind that decision-making process and give you the right to have that decision re-evaluated by a human being.

Likewise, we are aware of the UK's exit from the European Union and the end of the current transition period on December 31st, 2020. We are aware that the UK hopes for a positive adequacy decision from the EU by then to allow data transfers to continue, but we will continue to monitor the situation in case alternative transfer mechanisms from EU to UK or UK to US become available or necessary.

We will continue to rely on legal derogations for case-by-case transfers where appropriate and will identify where this is the case.

## Do we share Personal Data with third parties?

Yes. We may disclose your personal data to our agents or sub-contractors for the purposes identified above. In such cases, the agent or sub-contractor will be obligated to use the personal data in ways consistent with the terms of this Privacy Policy, and we will have a



contract that obligates them to similar levels of protection. Your data may be share with these types of agents and sub-contractors:

- Human Resources Information System (HRIS) service provider
- Compensation management system provider
- Payroll processor
- Benefits provider/ broker/administrator
- Assessment distributor
- Employee survey or engagement software provider
- Employee recognition platform provider
- Expense management service provider
- eSignature platform provider

We may also disclose your personal data without your permission to the extent that it is required to do so by applicable law, including in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend our legal rights. We disclose your personal data to our private equity sponsor, Vista Equity Partners, and its affiliates, including Vista Consulting Group (collectively, "Vista"), for administration, research, database development, and business operation purposes, in line with the terms of this Privacy Policy. Vista processes your personal data based on its legitimate interests in overseeing the recruitment process and your employment relationship with Granicus. We will not sell, distribute, or lease your personal data to third parties unless we have your permission or are required by law to do so.

## Where will your data be held?

Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents as described above. Information may be transferred internationally to the USA and other countries around the world, including countries that do not have data protection laws equivalent to those in the EU/UK. To ensure compliance with EU/UK data protection legislation, we have entered into an Intra-Company Group Data Transfer Agreement that has adopted the EU Standard Contractual Clauses as a mechanism to ensure the adequate safeguard of your personal information when transferred outside the EU/UK. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

## How do we protect your data?

We are committed to ensuring that your personal data is secure. In order to prevent unauthorized access, loss or disclosure, we have put in place security controls that reduce the risks of a security breach of your personal data. Please contact the Security department if you have concerns regarding security measures taken to protect your information.

## How long will we keep data?

We currently retain your data permanently. However, we are in the process of identifying retention periods, creating a retention schedule, and applying controls to ensure data is weeded, anonymized or deleted as appropriate when it reaches its assigned period. This does not affect your right to request data erasure. We will honour all such valid requests.

## What rights do you have?

To exercise any of the following rights, please contact [hr@granicus.com](mailto:hr@granicus.com). Under certain circumstances, by law you have the right to:

- \_Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- \_Request correction or completion of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- \_Request erasure of your personal data. This enables you to ask us to delete or remove personal data if we no longer have good reason for continuing to process it.
- \_Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- \_Request your rights in relation to automated processing of your data, such as a description of the logic and human involvement.

We advise employees to discuss these matters with line management and HR before making a formal request, as we are completely transparent about the use of your data. We do have to make the distinction between data that is "about you" and data where you may be mentioned but you are not the focus of the information. For example, you may not have the right to be supplied with data that mentions you if it has the customer as its focus. We may need to request specific information from you to help us confirm your identity and ensure your right to access the data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

## What if you need to make a complaint?

If you do have any concerns, please get in touch with HR. You have the right to make a complaint at any time to the relevant local, national or industry privacy regulator.

## Residents of California

The California Consumer Privacy Act (CCPA) will apply to data.

The CCPA covers the last 12 months of data, and includes rights such as access, deletion, opt out of sale, etc. But don't worry, we endeavour to treat all our staff the same and we will try to give you other GDPR rights that we mention in this policy! Some national and state timescales are different, and we'll notify you of them if you want to use the rights. In addition, you can bring your complaints to a regulator, in this case the California Attorney General. Importantly, the CCPA requires us to notify you if we buy or sell your data for any benefit. We do not buy or sell employee data; data is collected directly from you. We collect the same category of data irrespective of your location (whether you reside in the EU, UK or California) and for the same purpose. The collected data is shared with only the third parties mentioned in section #6 of this policy.

## ACCEPTABLE USE

All employees are required to review and acknowledge the Granicus Acceptable Use Policy, available on Confluence or from the Human Resources team.

Mandatory AUP training will be assigned through the Granicus training platform at regular intervals and must be completed within the specific timeframe.

Use of Granicus computers, telephones, voicemail, email, internet and other electronic communications is to support Granicus's business. It is the responsibility of each employee to ensure that all Granicus technology is used for proper business purposes, in a responsible manner and does not compromise the confidentiality of proprietary or other sensitive information.

Employees learning of the use of electronic communications that are inconsistent with the requirements of this policy must immediately notify Human Resources. Violations of this policy may result in disciplinary action, up to and including termination of employment.

Employees do not have a personal privacy right in any matter created, received, sent, accessed, or stored on any Granicus computer, telephone, voicemail, email or Internet connection. Designating a matter as private or confidential or the existence of passwords and "message delete" functions does not restrict or eliminate Granicus's ability or right to access electronic communications.

Granicus monitors its computer, telephone, voicemail and email systems and Internet connection and, at any time and without prior notice, may record telephone calls, listen to voicemail, and read and copy any and all files or data contained therein (including, but not limited to, email messages and personal file directories).

Granicus maintains full access to all electronic communication systems for the purpose of assuring compliance with legal requirements as well as internal policies, supporting the performance of internal investigations, and assisting with the management of Granicus's information systems.

All use of electronic communications must conform to the same standards of propriety and respect as any other verbal or written business communication. Demeaning, harassing, or defamatory communications, messages or postings are prohibited. This includes, but is not limited to, any electronic communication that is inconsistent with Granicus's Code of Ethics and Conduct.

# COPYRIGHT & INTELLECTUAL PROPERTY

Under the terms of the Patents Act 1977 and the Copyright, Designs and Patents Act 1988, an invention or discovery made by an employee will become the property of Granicus if it was made:

- in the course of the normal duties of the employee or in the course of duties specifically assigned to the employee
- in the course of the duties of the employee and at the time of making the invention, because of the nature of the duties and the responsibilities arising from those duties, the employee has a particular obligation to further the interests of Granicus

Any invention, improvement, design, process, information, copyright, work, software, trade mark or trade name or set-up made, created or discovered by an employee in the course of their employment (whether capable of being patented or registered or not and whether or not made, created or discovered in the course of their normal duties) in conjunction with or in any way affecting or relating to the business of Granicus or of any associated business or capable of being used or adapted for use in or in connection with such business shall be disclosed immediately to Granicus and shall (subject to sections 39 to 43 of the Patents Act 1977) belong to and be the absolute property of Granicus or such associated business as Granicus may direct.

# PROTECTING CONFIDENTIAL INFORMATION

In the course of employment with Granicus, employees will have access to, view, or work with information and materials that are confidential and that are regarded by Granicus or its customers as confidential, proprietary, or trade secrets. Such confidential information and materials are very valuable to Granicus and its customers. Therefore, improper access to or disclosure of any such confidential information and materials could irreparably harm Granicus and its customers.

It is impossible to list all the kinds of confidential information and materials to which employees might have access or visibility, or with which employees might work or be entrusted while at Granicus. Therefore, employees should treat all of Granicus's and its customers, business affairs, materials, plans, and projects as confidential information. Employees also should keep confidential all tangible property associated with these matters, such as notes, drawings, letters, software codes, programs, scripts, processes, designs, artwork, photographs, print outs, and non-public materials of any kind that employees or others prepare. Granicus may further designate from time to time, other specific items that are to be treated by employees as confidential.

Because of the importance of confidential information and materials to the business of Granicus and its customers, employees must not, at any time, disclose any such confidential information and materials to anyone—even after leaving Granicus—except as specifically authorised by Granicus in the course of employment, nor may employees make any personal use of such confidential information and materials.

Similarly, all non-public documents, files, records, and other work product relating to Granicus, or its customers are the property of Granicus or its customers and should not be

removed from the premises of Granicus except as authorised by Granicus in the course of employees' employment. Employees must exercise utmost care and take all steps that may be reasonably necessary to protect and guard against the disclosure of any confidential information or materials to anyone, even family members or vendors, suppliers, contractors, consultants, and others who may serve Granicus or its customers.

Employees are not entitled to view or gain access to all confidential information and materials of Granicus or its customers. Employees are entitled to gain access to and view only that confidential information and materials specifically entrusted to them for the purpose of performing their job at Granicus.

If employees are in possession of a previous employer's or another's confidential information and materials, employees have an obligation not to disclose such confidential information or materials to anyone at Granicus and must not do so. Employees are also prohibited from violating the rights of any other party in connection with their work and must honour all copyrights and other rights in computer software, photographs, drawings, written works, music, and other materials licensed for use or entrusted to Granicus or its clients.

No employee may photograph, tape, or otherwise record any person, document, conversation, communication, or activity that in any way involves confidential information of Granicus or employees of Granicus, its customers' or any other individual with whom Granicus is doing business or intending to do business in any capacity. The authorised copying of documents in the ordinary course of business for the benefit of Granicus is not prohibited by this policy. Limited exceptions will apply where the photographing, taping, or recording is being conducted by an individual who has been provided advance written authorisation for the activity by a member of Granicus senior leadership team. Where the conduct engaged in is illegal, violators may be subject to prosecution under applicable law.

Employees may be required to sign one or more agreements with Granicus or its customers addressing the protection of Granicus' or others' confidential information. This policy is not intended to supersede or replace any such agreement(s), but rather this policy and any such agreement(s) will be read together and applied to the fullest extent permissible that provides Granicus and its customers with the greatest amount of protection possible with respect to information and materials that are regarded by Granicus or its customers as trade secrets or as confidential or proprietary information.

## INFORMATION SECURITY

As supplement to the above, and associated information, up to date versions of the Granicus Information Security Manual and Information Classification and Handling Standards can be found on Confluence, along with all Information Security processes and policies, which apply to all Granicus employees globally.

Should an employee have any questions about the content or status of any Information Security policy or matter, they should contact the Information System Security Officer, or post in the appropriate Teams channel. Should an employee have a privacy-related question, they should contact the Data Privacy Officer or Chief Information Security Officer,

or post in the appropriate Teams channel. For any other questions, including about Insider Threat, an employee should reach out to the Human Resources team.

# EMPLOYEE HANDBOOK ACKNOWLEDGEMENT

I have received a copy of the Employee Handbook ("Handbook") outlining the current policies, and procedures of Granicus-Firmstep Limited ("Granicus") and accept that it forms part of my Terms and Conditions of Employment.

I understand that it is my responsibility to read and become familiar with the information contained in the Handbook, any other Granicus policies, and revisions made to them. I understand that the Handbook and supplements are intended as reference documents containing general employment guidelines and do not necessarily represent all guidelines and practices of Granicus.

I am aware that the information in the Handbook, and any supplemental policies are subject to change from time to time, and that any updates supersede all previous statements on similar subjects.

Employee Name: \_\_\_\_\_

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_