



BUSINESS PARTNER CODE OF CONDUCT

Purpose and Scope

At ePlus, we believe conducting business ethically and responsibly is the right thing to do for our business. This Business Partner Code of Conduct (the “Business Partner Code”) clarifies ePlus’ expectations in the areas of business integrity, labor practices, health and safety, and environmental management. ePlus’ Business Partner Code is intended to complement ePlus’ Code of Conduct and the other ePlus policies and standards referenced therein. Suppliers, vendors, contractors and subcontractors, consultants, agents and other providers of goods and services (“business partners”) who do business with ePlus-affiliated entities worldwide are expected to follow this Code.

Business Conduct Principles

ePlus expects its business partners to conduct business responsibly, ethically, with integrity, honesty, and transparency, and to adhere to the following code of conduct:

1. Maintain awareness and comply with the applicable laws and regulations of the countries of their operation.

2. Compete fairly for ePlus’ business, without paying bribes, kickbacks or giving anything of material value to secure an improper advantage. ePlus is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. ePlus expects business partners to comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and all other applicable federal, state and local law.

3. Create a work environment in which employees and business partners are valued and respected for their contributions. ePlus’ business partners will comply with all applicable anti-discrimination and anti-harassment laws. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment cannot be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience.

4. Treat employees fairly, including with respect to wages, working hours and benefits. ePlus’ business partners shall comply with all applicable legal and regulatory requirements and will apply sound employee relations practices. Working hours, wages, and benefits will comply with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally required benefits.

5. Prohibit all forms of forced or compulsory labor. ePlus’ business partners shall maintain and promote fundamental human rights. Employment decisions will be based on free choice. There will be no coerced or prison labor, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control. ePlus’ business partners shall comply with the Modern Slavery Act 2015, and other related laws and regulations that may be promulgated from time to time.

6. Respect employees' right to freedom of association and collective bargaining, consistent with local laws. Consistent with applicable law, ePlus' business partners shall respect employees' rights to join or refrain from joining associations and worker organizations.

7. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations. ePlus' business partners should consider the potential environmental impacts of daily business decision-making processes, along with opportunities for conservation of natural resources, recycling, source reduction and pollution control.

8. Maintain accurate financial books, business records and billing practices in accordance with all applicable legal and regulatory requirements and accepted accounting practices regarding documentation of all invoices to ePlus.

9. Comply with ePlus' policies regarding gifts and entertainment and conflicts of interest when dealing with ePlus employees. ePlus' business partners are prohibited from providing or offering gifts to ePlus employees intended to inappropriately influence ePlus' business decisions or gain an unfair advantage.

10. Respect all anti-counterfeiting laws. ePlus expects its vendors to provide only authentic, genuine products and software, and to promptly report to ePlus any suspected instance of counterfeit products or software having been delivered to any ePlus customer.

11. Respect all privacy laws. ePlus' business partners shall comply with all privacy laws, and take appropriate measures to maintain confidentiality and security of ePlus', its employees' and its customers' personal or confidential business information. In addition, all required background checks will be conducted by a third party if contractually required. Business partners will provide documentation of all required criminal background checks and drug testing upon request.

12. Report suspected violations of the Business Partner Code. Business partners and their employees and contractors have a responsibility to report suspected violations of the Business Partner Code. Reports can be made through ePlus' internal reporting mechanism, Voice It, which can be found at: <https://web.eplus.com/VoiceIt/>. Voice It is available on a 24/7 basis. Reports are treated confidentially, and you will remain anonymous where permitted by law.* ePlus strictly prohibits any kind of retaliation against any individual who raises an ethics or compliance concern in good faith.

The ePlus Business Partner Code may be updated from time to time and may be found online at www.eplus.com/bpcc.

* Due to local privacy laws in certain countries and the European Union, anonymity may be available only for certain types of reports, such as accounting, financial, auditing and bribery matters. In those countries, you may contact ePlus' Chief Compliance Officer at Compliance@eplus.com to report issues.