



Code of Conduct

 thoughtworks



Introduction letter

Dear Thoughtworkers,

Thoughtworks' shared purpose is "to create an extraordinary impact on the world through our culture and technology excellence". Our culture is built to enable this purpose with guiding principles influencing decisions, behaviors, and goals across all levels of the organization. Our culture starts with our core values and comes to life in the way we treat one another, how we run our business, and how we represent ourselves in the world. This culture has enabled us to build a responsible, authentic business and foster trust across our colleagues, clients, shareholders, and the communities we serve.

Maintaining this culture across a team of more than 10,000 professionals operating around the world requires constant attention and energy as we build the next generation of our business. The expectations we hold of one another remain steadfast that we must always conduct ourselves with integrity, treat each other with respect, take responsibility for our actions, and communicate with transparency in each and every part of our business.

Our Code of Conduct is a tangible expression of these values. It helps us create and sustain the culture which makes Thoughtworks special and serves as a guide for navigating the complexities of the modern world while staying true to our identity. It provides a consistent and durable reminder of our shared values and responsibilities. It reflects the best of who we are while helping us make ethical decisions and ensuring our culture remains strong and vibrant. Every Thoughtworker is expected to read, understand, and follow this Code of Conduct and to speak up whenever something doesn't feel right.

Thank you for being a part of Thoughtworks and for your role in building a culture we can all take pride in. Together, we make an extraordinary impact.

—

Mike Sutcliff

Chief Executive Officer

Ramona Mateiu

Chief Legal Officer & Chief Compliance Officer





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Hold ourselves accountable

Know our Code

Our culture is shaped by our “Why”, the way we treat each other and our values. This culture is what brought us here, and it is a key part of creating the extraordinary impact we strive to have in the world. Our Code of Conduct reinforces this culture and ensures everyone acts with integrity, respect, responsibility and transparency.

The Code is meant to:

- Embody the values and behaviors that form the basis of the community we trust and are proud to be part of and represent,
- Outline our expectations for how we conduct ourselves in all work-related interactions, whether within Thoughtworks, with our clients, or anyone else with whom we interact,
- Promote respectful, responsible and honest behavior,
- Prevent wrongdoing,
- Ensure compliance with applicable laws, rules and regulations,
- Hold each other accountable for following the Code.

The Code applies to all Thoughtworkers (directors, officers, employees, contractors, interns, volunteers) in every Thoughtworks entity globally. Every Thoughtworker is expected to read it, understand it, and follow it.

The Code applies to all Thoughtworkers (directors, officers, employees, contractors, interns, volunteers) in every Thoughtworks entity globally. Every Thoughtworker is expected to read it, understand it, and follow it. In addition, third parties, such as consultants, agents and suppliers, are required to comply with the Code when acting on Thoughtworks’ behalf or providing goods or services to or for Thoughtworks.



To keep our people aware of and engaged with our Code, training is delivered annually and in multiple languages, and all Thoughtworkers are required to complete it. Violations of this Code, our policies or the law may result in disciplinary actions up to and including termination of employment. The Code will be reviewed annually, or when prompted by certain events, changes to applicable laws and regulations, or in our business.

This policy is not intended to restrict any rights, communications or actions protected or required by applicable law. If there is any conflict or inconsistency, the applicable law shall override this Code.

Use the Code appropriately

Many of the principles and expectations described in this Code are general in nature. It does not (and cannot) cover all possible scenarios and details of Thoughtworkers' actions. It is meant to be a starting guide, pointing you to other sources of information — policies, guidelines and, in certain countries, employee handbooks — when greater detail around a topic is required.

We also expect you to use common sense and good judgment in applying this Code. It is not intended to replace or prevent honest feedback, individual accountability, and direct conversations. Giving, receiving, and responding to considerate feedback, the pursuit of excellence, and curiosity are important parts of our culture.



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Make decisions with integrity

If a situation arises where the right way to act is not immediately clear, ask yourself:

- Is this action aligned with Our Why?
- Is this action aligned with the foundational values of our Code of Conduct?
- Is this action allowed by the law or by any of our policies?
- Would this action seem appropriate to others?
- Would this action be harmless to Thoughtworks, my colleagues, clients, business partners or community?
- Would I be comfortable with the example this action sets for future decisions?
- Would I or Thoughtworks be comfortable if this action became publicly known?

If you answer “no” or “don’t know” to any of these questions, this action is likely inappropriate. If the path isn’t clear and you are unsure of how to act, seek input from others before following through on your decision. None of us have all the answers, and that’s fine, provided we reach out to find the best answers available and help each other in doing so. You can also reach out to one of your local People and Legal teams, or the global [Compliance Team](#).



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Is this action allowed by the law or by any of our policies?

Would this action seem appropriate to others?

Would this action be harmless to Thoughtworks, my colleagues, clients, business partners or community?

Would I be comfortable with the example this action sets for future decisions?

Would I or Thoughtworks be comfortable if this action became publicly known?

No / don't know
If you answer 'no' or 'don't know' to **any** of these questions, this action is likely inappropriate

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Know our shared responsibilities

Thoughtworkers' responsibility

- Behave with integrity and in line with Thoughtworks' standards, and applicable laws, rules and regulations.
- Read the Code and related policies and understand how they apply to the work you do and the decisions you make.
- Observe a client's Code of Conduct and any applicable policy when performing work for them, unless it conflicts with ours.
- Hold yourself and others accountable for following the Code.
- Speak up when something is not right and do not retaliate against anyone who reports a concern.
- Cooperate with internal investigations if needed.
- Complete mandatory training assigned to you.



Leaders' responsibility

In addition to the responsibilities that apply to every Thoughtworker, people who are in leadership roles have greater responsibilities for upholding what is in our Code and building a culture of trust and integrity within their teams. If you are in a leadership role, you're expected to:

- **Be a role model.** Lead by example by modeling the behaviors from our Code, and empowering your team to do the same.
- **Be informative.** Help and ensure that your team is equipped to understand our commitment to integrity, and act according to the expected behaviors. Be clear that you expect actions that are consistent with that commitment, and that you will support your team members when needed.
- **Be open.** Regardless of your team size and distribution, actively build a trusted and open environment in which your team members feel comfortable asking questions, expressing their ideas and opinions, and raising concerns without fear of retaliation.
- **Be alert.** Look out for situations or actions that may violate or appear to violate our Code, our policies or the law, or damage Thoughtworks' reputation, escalating them as needed.



- **Be diligent.** You are one of our Speak Up channels and are expected to appropriately handle concerns raised to you. When a member of your team raises a concern, you should:
 - Listen carefully,
 - Maintain confidentiality to the extent possible,
 - Continue to treat all team members the same way even if they've reported a concern or are the subject of the report,
 - Assess whether the concern requires escalation to the People, Legal or Compliance teams,
 - Call out for support when unsure of how to proceed,
 - Support our investigation process and the implementation of disciplinary or corrective actions when required.

Thoughtworks' responsibility

- Treat Thoughtworkers' questions, concerns and reports with care, sensitivity, and respect for confidentiality to the extent possible.
- Conduct proper investigations where appropriate.
- Protect people who report concerns in good faith from any retaliation.
- Take appropriate disciplinary or corrective action.

Speak up

We want everyone to feel comfortable raising their voices when something doesn't feel right, without fear of retaliation, and consistent with our culture of integrity. If you observe actions that violate or appear to violate our Code of Conduct, our policies, or the law, please speak up.

Our culture is open and transparent, so you are encouraged to address your concerns directly with the person involved if you feel comfortable doing so, or if it is appropriate to do so. If this isn't the case, or if you're in doubt about what to do, you can use any of our Speak Up channels:

Speak Up channels



Talk to your local
People or Legal teams,



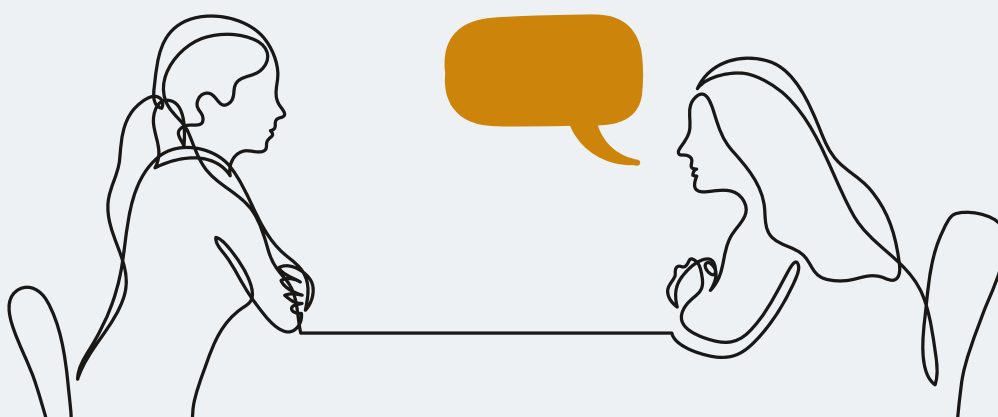
Send an email to the global
Compliance Team



Talk to your functional
leader, CLT or any global
or regional leader,



Submit a report through
Thoughtworks' Integrity Helpline
(web portal or by phone), which is
managed by an independent partner
and allows anonymous reporting.





Thoughtworks is committed to carefully assessing every report of a suspected violation, and to handle it according to its nature and severity. Where appropriate, we will conduct an objective, fact-finding investigation by an assigned team, which may consist of Thoughtworkers from Compliance, People, Legal, or other teams as required, or by external parties, such as external lawyers and consultants, where necessary. We will take actions to discipline people and/or improve our policies, processes and controls when required.



All good faith reports will be treated with sensitivity and respect for confidentiality, protecting the reporting party from any kind of retaliation. If you experience retaliation, please report that as well. In equal measure, any and all dishonest reports or false attacks aimed at specific individuals will not be tolerated. Such reports may result in disciplinary action, up to and including dismissal.

Thoughtworks has a full dedicated policy for reports. If you want to know more, please check the [Speak Up Policy](#) on Central.

All good faith reports will be treated with sensitivity and respect for confidentiality, protecting the reporting party from any kind of retaliation.





Respect people and the workplace

Treat all others with respect

Respect is the foundation for building and maintaining the diverse and inclusive workplace we actively strive to foster (see “[Foster diversity, equity and inclusion](#)”). We want everyone at Thoughtworks to feel respected and supported to be themselves, contribute, grow and succeed.

Thoughtworkers are expected to always respect each other’s individualities and differences, and treat others with dignity. This means kind regard for the feelings, wishes, rights or traditions of others, especially those with different beliefs, opinions and views from your own. Everyone should be afforded the same level of respect regardless of role, seniority, or tenure.

Thoughtworkers are expected to always respect each other’s individualities and differences, and treat others with dignity.

When you get involved in a passionate conversation, make sure you remain respectful and remember you can debate ideas without calling into question the character of a person who may disagree with you. If you find yourself in a discussion where maintaining that respect seems impossible, respectfully excuse yourself from the situation.

Thoughtworkers are expected to act respectfully and professionally in all work-related interactions, whether in person or remotely, at Thoughtworks’ offices or on the client-site, traveling on business, participating in conferences, communicating online through our internal communication channels or other applications, or attending social events with other Thoughtworkers, clients and everyone else we work with.



Mindful communication principles:

- Start all communications with respect.
- Assume your colleagues are also starting with an intention of being respectful, especially in short form communications.
- Be thoughtful about community dynamics — people who speak the most don't represent everyone.
- Consider the (often unintended) effect your words may have on others who have a different lived experience.
- If your colleagues express concerns, listen and respond accordingly.

For further guidance on how to communicate within our internal communication channels, refer to [Thoughtworks' Community Agreements](#).



Prohibit harassment, discrimination and retaliation

Thoughtworkers can only thrive in a workplace free of all forms of harassment, discrimination, bullying and retaliation.

Thoughtworks will not tolerate any less favorable treatment of a person based on personal characteristics (such as race, color, ancestry, ethnicity, national origin, religion, gender identity, sex, sexual orientation, pregnancy, age, marital status, or disability). Additionally, any conduct that creates an intimidating or hostile work environment, or unreasonably interferes with work performance will not be tolerated. This includes, but is not limited to, any form of intimidation, threats of violence, or deliberate mental or physical harm.

Be mindful of your actions and their impact on other people. Regardless of your intention, it is the perception by the impacted person that determines whether the behavior is unwelcome or harassing. If you are in a position of power with respect to someone else (seniority or leadership, for example), you assume greater responsibility for your actions if allegations are raised related to harassment or lack of consent.

Thoughtworks is strongly committed to action where a case of harassment, discrimination, bullying or retaliation is identified, whether working within Thoughtworks or with our clients or other external parties. Read the anti-harassment policy applicable to your location for detailed information.

The personal characteristics that are protected against harassment varies by jurisdiction. Even if a behavior does not rise to the level of harassment under the terms of a local law, they may still be considered inappropriate and in violation of Thoughtworks Code of Conduct.

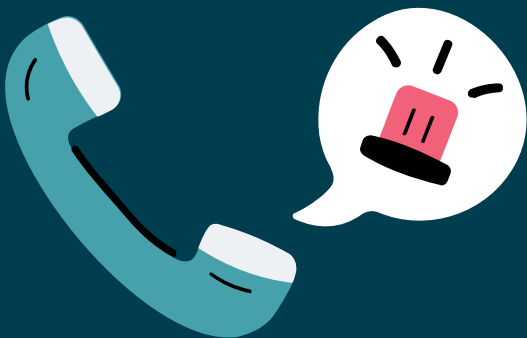


Keep yourself and the workplace environment safe, healthy and secure

We strive to provide a working environment that supports your physical health and mental well-being. Remote work support and programs related to employee assistance and workplace wellness are provided across all locations. All Thoughtworkers are empowered to take care of their individual health, observe the applicable local health and safety practices and look after each other.

Keep those around you at work safe and secure by never bringing guns or weapons into any Thoughtworks' or clients' locations, and never engaging in violence, threats or aggressions while in the workplace or while engaged in Thoughtworks' or client's activities.

The use of any substances (drugs, alcohol or other) should not impair your ability to perform your work or behave appropriately, nor threaten or compromise the safety and security of others. No one is allowed to possess, sell, purchase or distribute illegal substances on our premises or while conducting Thoughtworks' business. In many countries where we operate, the penalty for illegal drug use is severe and we expect all employees to observe local laws. If you are unsure of whether a certain substance is prohibited, please contact your local People Team or Legal Team. With respect to drinking alcohol in a work setting or sponsored-hosted event, Thoughtworkers must be responsible and follow local office policies from Thoughtworks and clients.



Immediate threats to the life of our people and workplace safety should be reported to your local authorities or emergency services. For non-emergency cases related to your or your colleagues' health and safety, including substance abuse, see local employee reference guides and seek help from your local People Team.



Conduct our business with integrity

Avoid conflicts of interest

A conflict of interest occurs when a personal or financial interest impairs your ability to make objective and unbiased business decisions, interferes with your job responsibilities, or conflicts with the interests of Thoughtworks or our clients.

Many situations can lead to the appearance of a conflict of interest, such as: performing another professional activity outside Thoughtworks; having a close or family relationship with another Thoughtworker or a possible client, business partner or supplier; offering or receiving gifts or entertainment; or making personal investments in competitors.

Never take personal advantage of an opportunity that belongs to Thoughtworks and recuse yourself from decisions where competing interests may affect your professional conduct and sound decision making.



Any activity or relationship that might give rise to a conflict, even when you think you are not biased, should be disclosed as soon as possible according to our process. Having a conflict of interest does not necessarily represent a violation of our Code of Conduct, but failure to disclose it does.

Read our [Conflicts of Interest Policy](#) and [Related Party Transactions Policy](#) on Central for more information.



Communicate correctly and appropriately with the public and on social media

Thoughtworks wants to ensure our culture, values and positions are accurately reflected both internally and externally. You can only make statements to the press or industry analysts on behalf of Thoughtworks or as a representative of Thoughtworks if you have approval from the [Corporate Communications team](#) and have received appropriate media training.

When posting on social media it is important to be intentional about whether you are posting in relation to your role at Thoughtworks or in your private capacity. However, you should always remember that anything you do or say, even in your private capacity, may be associated with Thoughtworks.

- When posting on social media in relation to your role at or association with Thoughtworks — always identify yourself. State your relationship or role with Thoughtworks when discussing the company or Thoughtworks-related matters.
- When posting as yourself in a private capacity, make it very clear that you are speaking for yourself and not on behalf of Thoughtworks. Be yourself and express your personal opinion.



While we fully support Thoughtworkers using social media, please make sure you do not disclose any confidential, proprietary or competitively sensitive information about Thoughtworks, our clients or business partners.

Read our [Corporate Communications Policy](#) for more information and ensure you follow it when communicating with the public or using social media. Before engaging in any public speaking engagement, please reach out to the [Corporate Communications team](#).

Do not trade with material nonpublic information

As a Thoughtworker, you may have access to client's information that would be material to an investor and is not yet publicly available — also called “material nonpublic information” (MNPI). MNPI may be information about publicly-traded companies, including Thoughtworks' clients, vendors or suppliers, which you might receive in the course of your employment at Thoughtworks or while providing services on Thoughtworks' behalf.

It is illegal to use material nonpublic information to trade securities. In addition, disclosing this kind of information to another person may violate insider trading laws and breach yours and Thoughtworks' confidentiality obligations.

Read our [Insider Trading Policy](#) for examples of MNPI and more information on the prohibited transactions.



Prevent and fight bribery and corruption

Corruption is a crime and is treated as such by Thoughtworks. In the course of running our business, we take action to eliminate corruption in all its forms. Never seek to influence government officials, business partners, advisors, or client decision makers by offering bribes, donating or promising to donate items of value, giving undue favors or making any threats to obtain inappropriate advantages.

Further details and examples are provided in our [Anti-Bribery and Anti-Corruption Policy](#). If you witness or suspect any inappropriate activity performed by Thoughtworks, a Thoughtworker or any of our clients or business partners, report it through one of our [Speak Up](#) channels.



Be responsible in giving and receiving gifts and entertainment

Giving or receiving occasional gifts and entertainment (such as meals, travel or lodging expenses, tickets to events), to or from our clients or business partners, in the context of a business relationship with Thoughtworks, is only acceptable under the following circumstances:

- The client or business partner is a non-government entity.
- Not offered to gain inappropriate advantage or improperly influence decisions.
- There is a legitimate business purpose behind it.
- Not given in the form of cash or its equivalent.
- Properly recorded in Thoughtworks' expense reimbursement system.
- Permitted by local law and the recipient's policies (many clients limit or forbid their employees from receiving gifts and entertainment, for example).
- The cost of the gift or entertainment is no more than the applicable country limit from our [Anti-Bribery and Anti-Corruption Policy](#).

Further details are provided in our [Anti-Bribery and Anti-Corruption Policy](#). If you have any questions or are unsure about whether a gift or entertainment is appropriate, please seek guidance from your local Legal Team or the global [Compliance Team](#).



Engage and interact with third parties honestly and responsibly

Engaging clients, business partners, suppliers and other third parties must always be carried out in the most transparent, diligent, documented and beneficial way for Thoughtworks, with no undisclosed conflicts of interest and in accordance with our internal policies and process. Be mindful of the following for each third party:



Clients and business partners

We strive to be awesome partners for our clients and their ambitious missions. To do so, we need to deeply understand their needs and how we can deliver value to them. During the sales process, we must ensure that:

- There are no undisclosed conflicts of interest arising from the engagement with the client. People that are in a position that might improperly influence the process should disclose the conflict as directed by our [Conflicts of Interest Policy](#) and recuse themselves from decisions related to the engagement.
- We propose a strong, viable solution to the client's problems that is aligned with our goals, capabilities and principles, and which we can deliver fully and to the client's satisfaction. Never commit to a solution that is not within the scope of our business to deliver before seeking appropriate input and approvals.
- All proposals and other documents that imply any commitment on the part of Thoughtworks to perform work, or which indicate binding agreements to deliver services to prospective and/or existing clients must receive proper approvals before submission to the prospective and/or existing client. There must be no side agreements. Everything must be captured in our written agreements and in our internal systems. This process ensures we engage in sustainable, profitable deals with minimum risk.
- Contracts and other binding legal agreements must be signed by the authorized signatories for each region or country (read our [Signature Authorization and Delegation of Authority Policy](#) for more information)
- When engaging with any client or business partner, work with your local Legal and Finance teams to conduct due diligence on them and monitor for any redflags any red flags that might arise throughout the relationship with them.



Government

- Before pursuing opportunities to provide services to government entities, departments and functions, seek guidance and approval from your Legal Team to ensure compliance with any government requirements related to bidding, pricing and service delivery.
- All statements to government procurement officials should be accurate and truthful, including costs and other financial data.
- Payments, gifts or other favors given to government officials are prohibited. Read our [Anti-Bribery and Anti-Corruption Policy](#) for more information.



Suppliers

- If you are procuring goods and services on behalf of Thoughtworks, always follow our [Procurement Policy](#).
- Offer fair opportunities for prospective third parties to compete for our business
- Ensure that the selected suppliers meet our technical and business requirements, agree to uphold the principles outlined in our Code of Conduct, and comply with our minimum standards applicable to suppliers.
- Employees or contractors from a supplier that provides services to Thoughtworks should follow engagement, compliance and exit requirements and procedures.

Throughout the engagement with any third party, be aware of and respect the contractual commitments Thoughtworks has made to them. Any challenges or changes to those commitments should be discussed with the third party transparently so that we can identify alternatives, or clarify our commitments in the agreements to ensure compliance.

In addition to following our own Code, we need to observe a client's Code of Conduct and any applicable policy when performing work for them. If you feel there is a misalignment between a client's or supplier's conduct and our standards, report it to your leadership or local People or Legal teams.



Compete fairly

We believe in fair and free competition, complying with all applicable antitrust and/or competition laws. We succeed because of our culture and technology excellence. We never seek competitive advantages through dishonest, collusive or unfair business practices that restrict free competition, such as:

- Collaborating or entering into agreements with competitors to fix pricing of services or offerings, bid rigging, or to divide opportunities, markets or clients
- Developing business strategies using confidential information from competitors
- Making misleading or false statements about our services or those of our competitors

We encourage studying other businesses and sharing knowledge, but only if we do it fairly, through legitimate sources of information and in compliance with all laws and regulations that apply to our business. Do not accept, seek or knowingly use competitor information without the proper permission to use the information, or where such information has been obtained by unethical or illegal means.

If you receive or are offered information about a competitor in circumstances that cause you any concern, you should not distribute it and should seek advice from your local Legal Team.



Comply with export control laws and sanctions regulations

Thoughtworks is responsible for complying with all export control laws that govern the export and re-export of our products, services and technical information for reasons of national security or protection of trade. Read our [Software Development and Encryption Source Code Policy](#) for more information on the use of encryption source code and export control.

We also comply with economic sanctions regulations that restrict where and with whom we do business.

Review all business opportunities with the support of your local Legal Team to identify any special legal requirements, such as obtaining an export control license or other required government authorization, and ensure compliance with economic sanctions adopted by countries where we do business.



Follow immigration laws and mobility policies

The ability to travel outside our home country creates great opportunities for Thoughtworkers, generates enormous value for our clients, helps cross-pollinate ideas, and keeps us connected as an organization.

Please read our [mobility policies](#) on Central carefully and ensure you will be able to follow them prior to your travel. Work with your Mobility Team to ensure you are taking all necessary steps to comply with immigration, tax, social security, and payroll requirements and obligations.

Prohibit money laundering

Money laundering is the process of converting illegal proceeds in order to make those funds appear legitimate. It is often attempted through cash transactions, but other complex commercial transactions may also hide financing for terrorism and criminal activities.

Thoughtworks takes affirmative steps to detect and prevent improper or illegal forms of payment and financial transactions, always requiring transparency of payments and disclosure of the identity of all parties involved. We only do business with reputable clients and third parties who are engaged in legitimate business activities.

Any activity that lacks transparency or seems suspicious should be reported to the global [Compliance Team](#).



Protect our assets and information

Use Thoughtworks' assets responsibly

We are all responsible for protecting Thoughtworks' assets, using them appropriately and as authorized, without misuse, abuse or theft. Assets include our property, facilities, computers, equipment, systems, confidential information, money, technology, brand and any other physical or intangible assets that are valuable to Thoughtworks. The same responsibility applies to the assets that belong to our clients and others with whom we interact.



Travel & Expenses

When incurring business expenses:

- Follow Travel & Expense policies applicable globally and in your country.
- Submit only legitimate and appropriate business expenses, for reimbursement, ensuring all claims comply with policy limits.
- Provide complete and accurate documentation and relevant information to support eligible claims.
- Submit expense claims on time.



Time reporting

Maintain transparency and accuracy by:

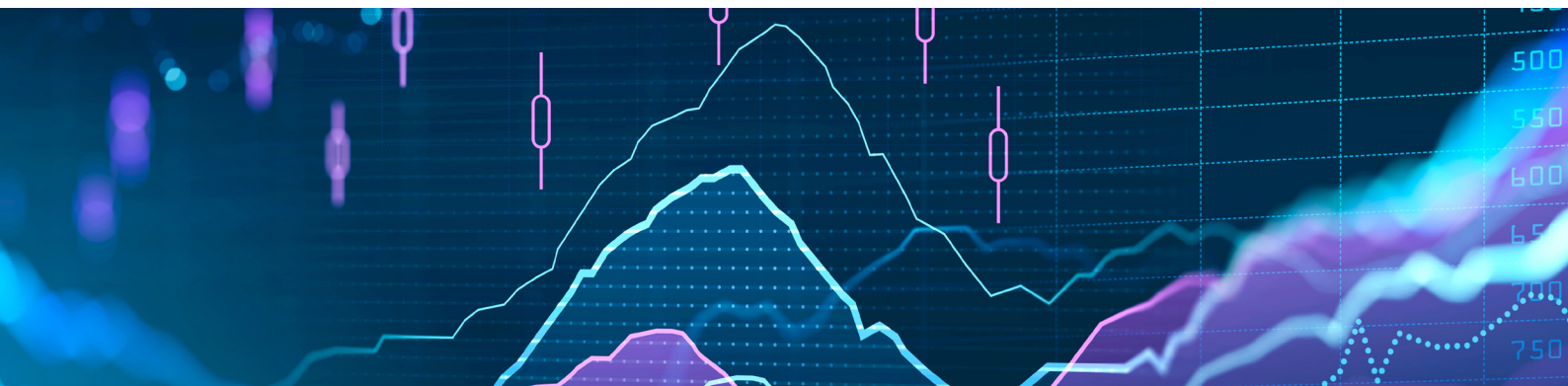
- Reporting all billable and non-billable hours in Thoughtworks systems and, where applicable, client systems.
- Submitting timesheets on time, using the correct charge codes, and promptly addressing any discrepancies.
- Planning vacation time in advance and reporting it in Thoughtworks systems.



Integrity and Compliance

Whether reporting hours worked or submitting expenses:

- Act with integrity and honesty to build trust with Thoughtworks and our clients, many of whom directly review and approve project time and expenses.
- Submit time and expenses promptly to enable timely client billing and maintain accurate financial records.
- Do not act in a fraudulent manner or manipulate systems or policies for personal gain. This includes submitting personal expenses as business expenses, logging hours you didn't actually work, or exploiting policy loopholes that, while technically within the rules, violate their intended purpose.



Prevent information security risks

We secure Thoughtworks and client information on devices used to access such information. It is vital that you keep your device and the software installed on it up-to-date to prevent security vulnerabilities. Make sure you follow our [information security policies](#), maintain defaults and do not install non-authorized software on your computer. On client accounts, we must abide by our client's security policies and contractual obligations in addition to Thoughtworks' policies.

For business communication, only use company-provided tools and software. This helps us meet our record-keeping obligations, while reducing the risk of phishing and other social engineering attacks. If one of our clients mandates and approves the use of a different tool or software, ensure such tool or software is only used for that client's data and purposes.

Remember that Thoughtworks' devices and software are provided to you for business purposes. If you use them for private purposes, be mindful that this use must be both legal and compliant with our policies, and that you separate your personal identity from your Thoughtworks identity. You cannot expect privacy beyond the statutory minimum in your jurisdiction regarding any information, even if it is of personal nature, that is transmitted, received or stored using Thoughtworks assets. This is because Thoughtworks has the right to monitor and access your activity at any time to ensure the protection of our business.

If you become aware of any security incident report it to our [InfoSec Team](#) immediately. If you have concerns about a potential vulnerability, or have questions about the proper use of our assets, reach out to infosec@thoughtworks.com.



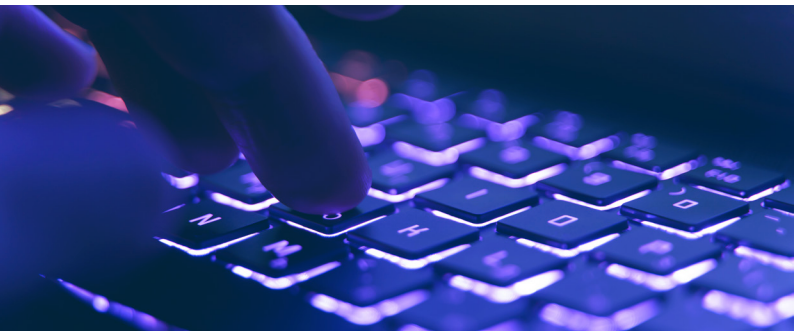
Use and manage data carefully

Thoughtworks and the services we provide to our clients run on data (including personal data). Each type of data has different levels of sensitivity and criticality, and we must use and manage it accordingly to mitigate the risk of unauthorized exposure, comply with data protection and information laws, and meet the contractual and confidentiality obligations we have with our clients to protect their information.

Ensure you have read and understood the [Data Protection Policy](#), including Thoughtworks' Data Protection Principles. When on a client project, ensure you have read and understood their Data Protection Policy as well. If you are unsure about anything related to personal data, reach out to our [Data Protection Team](#).

Data should only be used or shared when there is a business need, and then only with those who should rightly have access to such data. Always think about the classification of the data before sharing it — you can find about this in our [Information Classification Policy](#). No personal data may be indexed or used for training artificial intelligence without a risk or due diligence assessment.

All business records should be retained according to our [Record Retention Schedule](#) — we will generally delete data in line with the schedule, unless there is a legal hold on that data. If you are unsure about what data is a record that needs to follow the retention schedule, reach out to our [Data Protection Team](#).



Always think about the classification of the data before sharing it — you can find about this in our [Information Classification Policy](#).

Deploy artificial intelligence responsibly

When we utilize artificial intelligence (AI) in our organization and with our clients, we ensure responsibility for its governance, design, evolution, and performance. We place people at the center of all AI processes, ensuring that automated decisions reflect fairness, honesty, and respect for individual rights.

We uphold ethical AI by using data responsibly, protecting privacy, and minimizing bias in our models. Our systems are transparent, auditable, and explainable, and they align with our ethical standards, legal obligations, and industry best practices. Whether you're using AI internally or on client projects, it's essential to adhere to Thoughtworks' policies such as our [AI Safety Policy](#), [Data Protection Policy](#), and [Information Security policies](#). Visit our [AI guardrails](#) page on Central to learn more.



Respect intellectual property rights

Our business depends on intellectual property (IP) rights being respected, whether such IP belongs to Thoughtworks, our clients, competitors, former employers or others. We also must comply with vendor contracts, licensing terms and relevant local laws.

To ensure we remain compliant, please adhere to the following practices:

- Only use licensed assets or products procured through Thoughtworks (see our [Procurement Policy](#)) or our clients
- Always check the terms and conditions of open source products to ensure legitimate and compliant use of the product
- Always check and comply with a client's policies relating to the use of open source software in the client's environment
- Do not copy, reuse, publicly post, or store IP assets (such as client or Thoughtworks' internal systems code) or proprietary information outside of officially designated repositories without first obtaining express approval from your local Legal Team
- Observe all copyright conditions on materials at all times — the fact that material is available to view or download does not always mean that it can be used without a license
- Do not use confidential information obtained from prior employers or our competitors
- Ensure that all Thoughtworks' proposals, documents and other materials carry the appropriate Thoughtworks branding and logo, and adhere to our [brand guidelines](#)
- Please get approval from your local Marketing team prior to using Thoughtworks' brand identity, trademark, trade dress or logos outside Thoughtworks' environment. Please refer to our [Corporate Communications Policy](#) for further guidance
- If third parties and partners ask to use the Thoughtworks logo, or request a reference or case study, please submit the request to [Brand-Legal](#) for approval prior to any such use taking place
- Always ask for client's permission to use their logo on our website, in the corporate narrative deck, marketing collateral, at events or in sales pitches.

For specific guidance on our IP waiver process related to software and other content that Thoughtworkers create, read our [Open Knowledge and Outside Activities Policy](#).

Maintain accurate accounting and financial records

Thoughtworks' financial reporting statement, financial records or audit records must comply with all internal controls and applicable laws and regulations. The information disclosed should be accurate and reflective of Thoughtworks' operations to demonstrate the full and fair reporting of our financial condition.

The integrity of that information relies on the clear, complete, accurate and timely records of all business transactions, including client invoices, travel, time and expenses reports, and other financial and commercial records. Any fraud, misrepresentation or false statements regarding Thoughtworks' financial statements must be reported through our [Integrity Helpline](#), and overseen by Thoughtworks' Audit Committee on a global level.



Amplify positive social change

Foster diversity, equity and inclusion

As a technology company, we want to ensure that tech is built responsibly, inclusively and sustainably and we bring that lens to everything that we do. We expect all Thoughtworkers to act in a way that reflects these values.

We believe in equal employment opportunities and are committed to ensuring that Thoughtworkers receive equitable compensation, as well as learning and growth opportunities. Employment-related decisions should be made without bias, based only on an individual's ability to perform their role.

The Diversity, Equity and Inclusion, Sustainability, and Social Change ([DEISSC](#)) function is at hand for any related questions.

Respect human rights and fair labor practices

We respect and support the rights and freedoms every person is entitled to have. We do not use or condone any form of modern slavery, forced or child labor, or human trafficking. We are committed to promoting a workplace environment that is safe, healthy, secure, and free of discrimination and harassment (see "[Respect people and the workplace](#)").

Our employment conditions and working practices comply with the ILO (International Labor Organization) standards and local labor laws, enable freedom of association, and facilitate privacy and data protection rights of all individuals. Furthermore, Thoughtworks has committed to the United Nations Global Compact to align with the United Nations Guiding Principles on Business and Human Rights.

We expect the same commitment to human rights and fair labor practices from all others we work with, including our suppliers, who must adhere to the principles outlined in our Code of Conduct and commit to operate ethical business practices.



Practice sustainability

Thoughtworks has made a public commitment to reducing our carbon emissions in line with the Science Based Targets Initiative. To achieve our environmental sustainability goals, we take into account the environmental impacts of our business decisions including travel, procurement and office operations.

We also support and encourage Thoughtworkers to engage in our environmental efforts. We undertake activities to raise awareness among Thoughtworkers about the benefits of public transportation and ride sharing when practical, using electronic media over paper, participating in office recycling programs, and avoiding excess packaging. Each of us must take responsibility for adopting sustainable responsible practices in the workplace.

We leverage our skills to advance environmental sustainability in our sector, working with partners, peers and clients to reduce carbon emissions and create positive social impact.

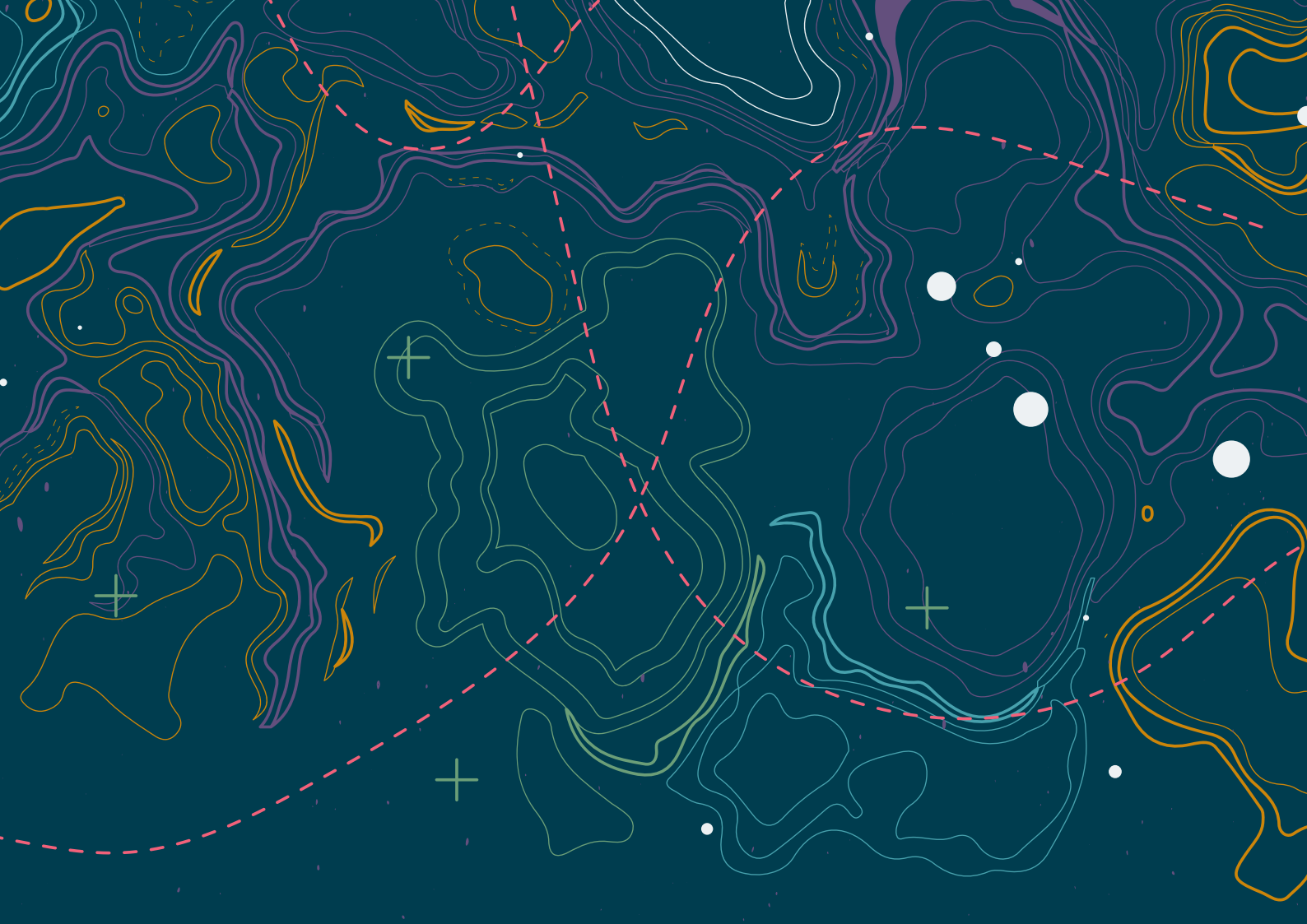


Support aligned external organizations

Core to our commitment to social change and an equitable tech future is our work with social sector organizations.

We want to provide a platform to empower Thoughtworkers to act on their passion for social change by supporting organizations with design, strategy and technical solutions. We are committed to open source technology and have global partnerships designed to advance the development and equitable access of open source tools.

In order to help us achieve our social change goals, Thoughtworks may provide in-kind services, sponsorship and/or donations to organizations that align with our mission and meet our eligibility criteria. All requests for corporate sponsorships, donations or contributions (paid or in-kind) must be consistent with applicable law and Thoughtworks' policies, such as [Charitable Donations Policy](#), [Anti-Bribery and Anti-Corruption Policy](#) and [Conflicts of Interest Policy](#).



Appendix

Appendix A - Global Policies

All global policies referenced throughout this Code support it and can be found on [this page](#) on Central.

Appendix B - Local Addendums

Every location has its own addendum to the Code of Conduct to cover specific local laws. The local addendums are extensions of the Code and can be found on [this page](#) on Central.

More information?

Please visit the [Code of Conduct page](#) on Central. There you can find supporting materials and information related to the Code itself, global and local policies, training, and how to raise concerns. You can also reach out to your local People and Legal teams, or the [global Compliance Team](#).

Policy owner: Global Compliance Team

Policy effective date: January 30 2019

Date of last policy review: February 3, 2025

Date of last policy update: February 3, 2025

Approved by: Thoughtworks' Board of Directors