



ANSYS, Inc.

Supplier Code of Business Conduct and Ethics

Introduction

ANSYS, Inc., including its subsidiaries and controlled affiliates (collectively, “Ansys”), is committed to doing business with integrity, acting consistently with our Core Values, and complying with all applicable laws and regulations. Ansys’ Core Values – customer focus, results and accountability, innovation, transparency and integrity, mastery, diversity and inclusiveness, sense of urgency, and collaboration and teamwork – are the fundamental values upon which Ansys was built, and they will serve as the foundation upon which we continue to grow our business and empower our customers to design and deliver transformational products through pervasive simulation.

As an Ansys supplier, vendor or contractor, you are an important part of our business, and we expect you, your employees, agents and subcontractors (collectively, “Supplier”) to share Ansys’ values and commitment to ethical business practices. This *Supplier Code of Business Conduct and Ethics* (“Supplier Code”) is intended to communicate Ansys’ minimum requirements for the standards and business practices of Ansys’ Suppliers.

Application of this Supplier Code

Laws. Supplier must operate in full compliance with all laws and regulations that apply to your business with or on behalf of Ansys. If the requirements of these laws and regulations are more restrictive than the standards set forth in this Supplier Code, you must follow the more restrictive requirements.

Contractual requirements. Supplier must also comply with contractual requirements, including those contractual requirements that may be contained in agreements between you and Ansys. The requirements set forth in this Supplier Code are not intended to replace the terms of any contract between Supplier and Ansys. Rather, the requirements in this Supplier Code are intended to supplement the terms of any such contract(s). If a contractual term is more restrictive than the standards set forth in this Supplier Code, you must follow the more restrictive contractual requirement.

Ensuring compliance. Supplier must have adequate management systems and controls in place, commensurate with the size and nature of its business, to ensure compliance with this Supplier Code. To the extent applicable, Supplier must ensure its own suppliers agree to adhere to standards comparable to those set forth in this Supplier Code. Supplier must ensure that its personnel and those of its suppliers are adequately trained on the requirements of this Supplier Code. Ansys reserves the right to verify compliance with this Supplier Code using mechanisms including, but not limited to, self-assessments, surveys, site visits, or audits.

Supplier Code violations. Our goal is to work with Suppliers to assure compliance with this Supplier Code, and we will inform Suppliers of instances of actual or suspected non-compliance when we learn of them. We take a continuous improvement approach and work with Suppliers to improve their practices. Supplier must take corrective actions to address non-compliance and keep us informed of its remediation efforts. Supplier’s significant or recurring breaches, without corrective actions and remedy, or lack of cooperation, could result in Ansys’ reduction or termination of business with Supplier.

Responsible business practices and ethics

We expect Supplier to comply with all applicable laws, regulations, and standards in every country in which it operates. Supplier is also expected to conduct its business in an ethical manner and to act with integrity, to include the following:

Bribery and corruption. Supplier must not engage in, endorse, nor tolerate any form of bribery or corruption. Supplier must not – directly or indirectly through a third party – promise, authorize, offer, give, or accept any form of improper benefit to or from a third party, public or private, with the purpose of obtaining or retaining business or preferential treatment.

Accurate books and records. Supplier must accurately document all transactions with Ansys or related to Ansys business in Supplier’s records and in all documents provided to Ansys. Supplier must not enter into any side agreements or establish or maintain any undisclosed or unrecorded fund or asset related to any Ansys transaction.

Antitrust and fair competition. Supplier must conduct business in full compliance with antitrust and fair competition laws. Suppliers must avoid any business practices aimed at limiting or impairing full and open competition for the products or services you provide to Ansys. Suppliers must not offer our employees any confidential information about a competitor of Ansys.

Conflicts of interest. Supplier must avoid relationships with any Ansys employee that affect or might appear to affect the objectivity of the employee’s judgement or that creates or appears to create a conflict of interest for that employee. To avoid conflicts of interest or the appearance of impropriety:

- When negotiating a Supplier agreement or performing your obligations to Ansys, Supplier must not deal directly with any Ansys employee who holds – or whose spouse, domestic partner or other family member or relative holds – a significant financial interest in the Supplier.
- Supplier must not offer any goods, services, business opportunities, commissions or advantageous financial arrangements that would personally benefit an Ansys employee.
- The key to addressing conflicts of interest is prompt and full disclosure, and Supplier is expected to report any actual or potential conflict of interest – for example, family or close personal relationships with Ansys employees, joint business interests with Ansys employees, and similar relationships or arrangements – as soon as you become aware of the situation. Such disclosures may be made by contacting Ansys’ Ethics & Compliance team (“Ethics & Compliance”) or the Ansys Ethics Line as described in the “Seeking Guidance and Reporting Concerns” section below.

Insider Trading. As an Ansys Supplier, you may be given access to material, nonpublic information about Ansys or third parties. Supplier must avoid insider trading by not buying or selling the securities of Ansys or another company when in possession of information that is not available to the investing public and that could influence an investor’s decision to buy, sell or hold such securities. Supplier also must not provide nonpublic information about Ansys or third parties to another person, including when that information could influence an investor’s decision to buy, sell, or hold securities.

Confidentiality. Supplier must protect the confidential information they receive or maintain on behalf of Ansys from unauthorized access, destruction, use, modification, and disclosure. Nothing in this obligation of confidentiality or elsewhere prohibits you from raising concerns about violations of this Supplier Code or the law either during or after your engagement with Ansys. Further, nothing in this obligation of confidentiality or any other Ansys policy or agreement restricts your ability, either during or after your engagement with Ansys, to communicate with government agencies about possible violations of the Supplier Code or applicable law, provide information to government agencies, file a complaint with government agencies, or participate in government agency investigations or proceedings.

Personal data. Supplier must comply with the applicable data privacy and information security laws and regulations regarding the collection, use, distribution, destruction and other processing of personal data (that is, data about an identified or identifiable individual).

Intellectual Property. Ansys' intellectual property, or IP, is an important asset that must be protected at all times. Supplier must never allow a third party to use our IP without proper authorization and a license agreement that has been approved by the Ansys Legal Department. In addition to protecting Ansys' IP, Supplier must respect the IP rights of others. You have a duty to ensure that you obtain appropriate rights to access or use third-party IP. You must also avoid infringement of any third party's patents, trademarks, copyrights, and trade secrets.

Trade compliance. Supplier must comply with all export, re-export, and import laws and regulations, and all trade controls, applicable to Ansys business and products, including sanctions and embargoes prohibiting business with specific countries, parties, or for specific purposes. Supplier must not procure products for Ansys from countries subject to trade sanctions or from suppliers that are listed in connection with a trade sanctions program or other list of proscribed individuals or entities in violation of applicable law.

Conflict minerals. Supplier must take reasonable efforts to avoid use in its products of raw materials that directly or indirectly finance armed groups who violate human rights. Supplier must undertake reasonable due diligence with its supply chain to identify and document the source of origin of the minerals contained in the products provided to Ansys, and respond to Ansys inquiries regarding existence of conflict minerals in Supplier products.

Social and Working Conditions

Supplier is expected to conduct its business in a manner that respects human rights and complies with applicable employment laws and internationally recognized human rights standards, including the following:

Human rights. At Ansys, we strongly believe and are committed to respecting human rights. We expect the same commitment from our Suppliers. It is not only the right thing to do, it also drives our success by allowing people's full potential to be realized. We look to the human rights defined in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Rights at Work. We also consider the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises as best practice for understanding and managing human rights risks and impacts.

Harassment and discrimination. Supplier must promote a work environment free from verbal, physical, or mental abuse, threats, violence, or any form of harassment during employment or recruitment. Similarly, Supplier must not engage in unlawful discrimination in hiring and employment practices such as promotions, rewards and access to training. Employees must not be subject to discrimination based on, but not limited to, non-job-related characteristics such as: race, color, ancestry, citizenship, national origin, religion, veteran status, disability, medical condition, genetic characteristics or information, age, gender, sexual orientation, gender identity or expression, sex, creed, marital status, family status, pregnancy, or other legally protected status.

Health and safety. Ansys is committed to the prevention of workplace injuries and illnesses, and to compliance with applicable laws and company policies related to employee health and safety. Supplier must also comply with applicable health and safety laws and regulations and promote safe and healthy workplaces to reduce the risk of accidents, injuries, and exposure. We encourage Supplier to implement

and have in place a performance monitoring program to account for aspects of their health and safety programs.

Hiring and termination. Supplier must comply with applicable laws governing eligibility for employment, recruitment, and termination. Supplier must not knowingly employ individuals who are not authorized to work, as determined by governing law.

Child labor. Supplier must comply with the minimum age requirements as prescribed by applicable laws and regulations. Supplier must adhere to our contracts or other applicable supplemental guidelines which may provide standards at a higher level. Supplier must not interfere with a child's education by employing a child in violation of a country's compulsory education laws. Supplier may use legitimate, voluntary workplace apprenticeship programs, such as student internships, as long as they comply with all laws and regulations. Workers under the age of 18 must not be asked or required to perform work that is likely to jeopardize their health, safety or well-being.

Forced labor. Supplier must use only voluntary labor. Any form of forced labor, including bonded, indentured, or involuntary prison labor is prohibited. Human trafficking and trafficking-related activities are also prohibited, including using misleading or fraudulent recruitment practices, charging recruitment fees, denying employee access to their identity documents, failing to provide return transportation costs or an employment agreement (if required) in the employee's native language.

Wages, benefits, and working hours. Supplier must comply with all applicable laws governing wages, benefits, and working hour requirements, including compensations, benefits, and overtime. Accurate written records of employees' regular and overtime hours should be maintained.

Freedom of association. Supplier should respect employees' right to freedom of association including the right to collectively bargain, consistent with local laws and ensure that all employee relationships are of a voluntary nature. Employees must not be subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.

Environment and Sustainability

Supplier must comply with all applicable environmental laws, regulations and directives, including those regulating hazardous materials, air and water emissions, and waste. Supplier must also obtain and maintain all required environmental permits and registrations.

We encourage Supplier to take into account the environmental impact in business decision-making and consider opportunities for conservation of natural resources as well as pollution prevention and control. In this regard, Supplier should use its reasonable efforts to:

- limit the use of natural resources by minimizing consumption of materials and maximizing recycling,
- manage materials that may pose a threat to the environment, such as chemicals, batteries, and wastewater, to ensure safe use, handling, and disposal,
- utilize safe and environmentally friendly installations in Supplier's manufacturing processes,
- integrate sustainability considerations into product development, design and production processes, and
- promote energy efficiency in buildings, production plants and performance of services.

Seeking Guidance and Reporting Concerns

This Supplier Code cannot address every possible situation that you might encounter in your daily work. If you cannot find an answer in this Supplier Code or if you have questions about how to interpret this

Supplier Code, ask for help. And if you are aware of something that may be a violation of this Supplier Code or the law, you must speak up and report it so it can be addressed.

You can ask questions, raise concerns or make reports of suspected compliance violations by contacting the Ansys Ethics Line:

- by phone using a special toll-free telephone number based on the country from which you are calling. In the United States, call 855-729-0134. For a list of international country phone numbers, see our [Code of Business Conduct and Ethics](#).
- by web available at <https://ansys.ethicspoint.com>

The Ansys Ethics Line is managed by an outside company and is available 24 hours a day, seven days a week. Where allowed by local law, you may make an anonymous report to the Ansys Ethics Line.

You may also ask questions and report concerns by emailing Ethics & Compliance at compliance@ansys.com.

NO RETALIATION – You will not be retaliated against for reporting any concern or a suspected violation of this Policy that you, in good faith, reasonably believe to be true. Any such attempted retaliation will be subject to disciplinary action, up to and including termination, to the extent permissible under applicable local laws, regulations, and work rules.

Policy adopted and effective as of March 25, 2022