Rackspace Technology

Code of conduct and business ethics

rackspace technology®

Copyright © 2025 Rackspace :: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service marks of Rackspace US, Inc. in the United States and other countries :: July 1, 2025 :: rackspace.com/information/legal/code-of-conduct :: TSK-8942

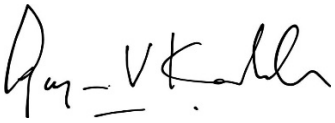
A message from our Chief Executive Officer

Rackspace Technology is known for exceeding expectations for our customers, partners, communities, and fellow team members. As we grow into new products and regions, one principle sits at the center of who we are and how we win: trust. Trust is our currency. We earn it through lawful, ethical, and transparent actions in every interaction.

Everyone at Rackspace completes annual Code of Conduct training. The Code applies to all Rackers worldwide as well as directors, officers, and contractors. Understanding and upholding the Code is a condition of working here. Managers are accountable for modeling and enforcing it. This is how we protect customers, one another, and the trust that powers our business.

Thank you for living our Code and safeguarding the trust that powers Rackspace Technology.

Sincerely,



Gajen Kandiah

rackspace technology

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Table of contents

Introduction 4

Waivers to the code of conduct 4

Doing the right thing (excellence) 5

Compliance with laws, rules and regulations 5

Reporting procedures 5

Doing the right thing for each other (compassion) 6

Discrimination and harassment 6

Health and safety 7

Record keeping 7

Employee information privacy 7

Labor and Human rights 8

Equal Opportunity, Non-Discrimination, and Inclusion 8

Fair Wages and Working Hours 8

Doing the right thing for stakeholders (customer-driven) 8

Insider trading 8

Conflicts of interest 9

Selection and use of third parties/procurement (fair purchasing) 9

Customer and supplier relationships 10

Protecting customer/third party information privacy 10

Intellectual property and protecting IP 11

Proprietary and confidential information 11

Protection and proper use of company assets and resources 12

Disclosure 12

Compliance with amendments of this code 12

Communicating with external parties 13

Social media 13

Doing the right thing for the marketplace (expertise and agility) 13

Obtain competitive information fairly 14

Honest advertising and marketing 14

Anti-corruption/anti-bribery 14

Gifts and entertainment 15

Anti-money laundering 16

Social responsibility 16

Summary 16

rackspace technology®

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Introduction

Rackspace Technology is built upon a foundation of strong corporate values and business practices. The Company works hard every day to ensure that it is able to uphold its reputation for integrity and ethical leadership. The Company's standards represent the core of how it creates the solid foundation of respect, trust and success that is reflected in its relationships with Rackspace Technology stakeholders, employees, representatives and their communities. Rackspace Technology knows that the way it achieves these objectives matters as much, if not more than the results.

All parties are expected to read this Code and ensure they understand and comply with it. Although this Code covers a wide range of business practices and procedures, it does not address every issue that may arise. Rather, the Code sets out basic principles to guide all parties in the professional and ethical conduct of business. All Rackspace Technology employees and representatives must conduct themselves accordingly and seek to avoid even the appearance of impropriety. All parties are responsible for exercising good judgment, applying ethical standards, obeying the law and raising questions when in doubt.

Rackspace Technology leaders show a commitment to values through their actions. They also promote an environment where compliance is expected and ethical behavior is the norm. All Rackspace Technology employees must comply with the Company's values and principles. No one should ask Rackspace Technology employees to break the law or go against the Company's values, policies and procedures.

Those who violate the standards in this Code may be subject to disciplinary action, up to and including termination of employment. Rackspace Technology employees who have knowledge of a violation and fail to move promptly to report or correct it, or who direct or approve violations, may also be subject to disciplinary action, up to and including termination of employment. Further, violations of some provisions of the Code are also illegal and may subject the employee or representative to civil and criminal liability. Anyone found in a situation that they believe may violate or lead to a violation of this Code should follow the guidelines described in this Code.

The Code is not a replacement of the Company's policies or Employee Handbook. It is a statement of additional standards, practices and guidelines, which are applicable to all Rackspace Technology employees. Rackspace Technology employees should refer to the Company's other policies and procedures for implementing the general principles set forth below. Rackspace Technology employees are encouraged to seek guidance from managers or other appropriate personnel when in doubt about the best course of action to take in a particular situation. Any questions about the Code should be directed to the Chief Legal Officer.

Rackspace Technology may periodically revise and supplement the Code. Thus, comments and suggestions regarding the Code are encouraged and should be directed to the Chief Legal Officer. The Code is a tool to assist Rackspace Technology employees and representatives in performing their duties in compliance with Rackspace Technology policies and applicable laws.

Waivers of the code of business conduct and ethics

Rackspace Technology may waive certain provisions of this Code where circumstances warrant granting a waiver based on the best interests of Rackspace Technology and its stakeholders. Any waiver pertaining to an employee must be approved by the Chief Legal Officer and by the Chief Executive Officer. Waivers of the Code for Directors and executive officers may be made only by those members of the Board of Directors not involved in the possible waiver and must be promptly disclosed as required by law.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Doing the right thing

Compliance with laws, rules and regulations

The Rackspace Technology standards of business conduct serve as an important resource for Rackspace Technology employees and representatives in support of day-to-day decision making. The Code should be used as a resource when questions of legal or ethical appropriateness arise. It is not a comprehensive rulebook, but rather a statement of how Rackspace Technology is committed to doing business. All employees and representatives of Rackspace Technology have a personal responsibility to uphold and ensure the letter and spirit of the code of conduct in their individual roles, every single day. It is important that Rackspace Technology employees and representatives are aware of, and never intentionally violate, relevant laws and regulations. Rackspace Technology employees and representatives should also be alert to changes in the law or new requirements that may affect their business unit, as well as new products or services that may be subject to special legal requirements.

Examples:

Question: The different laws are so complicated and cover so many different areas. How can I be sure that I won't violate some little technicality? Moreover, how am I supposed to understand it all? I'm not a lawyer.

Answer: *Don't abandon your own judgment. If something seems intuitively wrong to you, ask before acting. You also have an obligation to understand the finer points of the rules governing your job. Do not hesitate to contact the legal department if you need clarification of the laws or of our standards and policies.*

Question: What happens if I am faced with a situation where acting ethically conflicts with making a profit for the Company?

Answer: *You must always engage in legal and ethical conduct no matter the circumstances. Long-term profitability at Rackspace Technology depends on our reputation. If you feel that there is a conflict between what is "right" and what is profitable, you should seek guidance from your supervisor, Chief Legal Officer, or any of the other resources listed in this Code.*

Reporting procedures

Maintaining ethical standards is the responsibility and obligation of every Rackspace employee or representative. Early identification and resolution of violations of or questions about the Code are critical to maintaining the commitments to Rackspace Technology, customers, partners, suppliers, service providers, stockholders and to fellow Rackspace Technology employees and representatives. If something seems unethical or improper, or if employees or representatives have questions about the best course of action, they should promptly contact any of the following:

- Their department manager or any Rackspace Technology manager,
- Their human resources representative,
- The Chief Legal Officer, or
- File a report online at speakuprackspace.com.

The Rackspace Technology Speakup website is operated by specially trained third-party representatives and is available 24 hours a day, 7 days a week. Please be aware that the information provided on the Speakup website is directed to U.S.-based citizens. Speakup representatives will ask questions and review the information provided. They will then forward the concern to an appropriate Rackspace Technology officer or Director. In most countries, questions or concerns may be submitted to the Speakup website anonymously.

Concerns will be taken seriously and all information provided will be treated confidentially. Rackspace Technology will thoroughly investigate and seek to resolve the matter promptly.

All reported violations will be acted on appropriately. If a concern requires an investigation, the Company will respond promptly. To the extent possible, the individual raising the concern will be informed about the status of the investigation and the outcome of the matter.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

It is against Company policy to retaliate against any Rackspace Technology employee or representative who, in good faith, reported a violation or suspected violation of law, this Code, or other Company policies. Additionally, retaliation against those who assist in an investigation or reported violation is also prohibited. Any Rackspace Technology employee who retaliates against anyone who made a good faith complaint may be subject to disciplinary action by the Company up to and including termination of employment.

The Rackspace Technology Board of Directors or its designated committee will be responsible for investigating violations and determining appropriate disciplinary action for matters involving Directors or executive officers. The Rackspace Technology Board of Directors reserves the right to investigate violations and determine appropriate disciplinary action on its own or to designate others to do so in place of, or in addition to, the Chief Legal Officer. It is imperative that persons reporting potential violations not conduct an investigation on their own. However, Rackspace Technology employees and representatives are expected to cooperate fully with any Company investigation into reported violations.

Sensitive Complaints: A Sensitive Complaint is a complaint containing allegations that:

- Concern improprieties in accounting, auditing, financial record-keeping or internal accounting controls;
- Involve conduct of Directors or officers;
- Have realistic potential to cause significant financial, legal, or regulatory consequences for the Company;
- Might reasonably result in significant adverse publicity;
- Involve the systematic violation of customer trust; or
- Concern systemic criminal conduct not otherwise covered by one of the above categories.

Any person who has or receives a complaint that he or she believes may be a Sensitive Complaint should forward that complaint immediately to the Chief Legal Officer or, if using the Rackspace Technology Speak up line or website, explain that the matter in the report is a potential Sensitive Complaint.

Doing the right thing for each other

Discrimination and harassment

Having a diverse workforce — made up of team members who bring a wide variety of skills, abilities, experiences and perspectives — is essential to success at Rackspace Technology. The Company is committed to the principles of equal employment opportunity, inclusion and respect. All employment-related decisions must be based on Company needs, job requirements and individual qualifications. Rackspace Technology does not tolerate discrimination against anyone — team members, customers, business partners, or other stakeholders — on the basis of race, color, religion, national origin, sex (including pregnancy), age, disability, sexual orientation, gender identity, marital status, past or present military service, or any other status protected by the laws or regulations in the locations where Rackspace Technology operates. Rackspace Technology complies with laws regarding employment of immigrants and non-citizens and provides equal employment opportunity to everyone who is legally authorized to work in the applicable country. Rackspace Technology provides reasonable accommodations to individuals with disabilities and removes any artificial barriers to success.

As is the case with any violation of the Code, all Rackspace Technology employees and representatives have a responsibility to report any discriminating or harassing behavior or condition even if they are not directly involved or are just a witness. Retaliation for making a complaint or for assisting in the investigation of a discrimination or harassment complaint is prohibited.

A Rackspace Technology employee or representative should report acts of discrimination or harassment to any of the following:

- Their manager or any Rackspace Technology manager,
- Their human resources representative,
- The Chief Legal Officer or any member of the legal team, or
- File a report online at speakuprackspace.com.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Examples:

Question: Sometimes my manager favors certain employees with overtime and good job assignments. I think I am being discriminated against. What should I do?

Answer: *You need to discuss this with your manager. Tell your manager that you feel you are not being treated fairly in terms of job assignments and overtime. Give him or her specific examples. If your manager is unresponsive or if you have any fear of retaliation, contact your human resources representative, the Hotline or a member of the legal team.*

Question: During a department presentation I asked a question. I felt the response I received was abusive and I felt humiliated. Several other people in the room started to laugh. What should I do?

Answer: *Our Company encourages open communication, differing opinions on issues and healthy debate when decisions are being made. However, disagreements must be handled professionally and respectfully. Talk to the individual who made you uncomfortable, or contact your manager or your human resources representative.*

Health and safety

The Company strives to provide each employee with a healthy and safe work environment. Each employee has responsibility for maintaining a safe and healthy workplace by following the applicable health and safety rules and practices and reporting accidents and injuries, as well as any unsafe equipment, practices, or conditions as per local country procedures. Employees should contact their manager for more information.

Record-keeping

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true and actual number of hours worked by an employee should be reported.

Many Rackspace Technology employees regularly use business expense accounts. These accounts must be properly documented and expenses recorded accurately for reimbursement. Employees who are not sure whether a certain expense is authorized for reimbursement should ask their manager.

The Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls. All assets of the Company must be carefully and properly accounted for. Written contracts with customers, suppliers and others must be reflective of the entire agreement. Unreported side agreements are prohibited. The making of false or misleading records or documentation is strictly prohibited. Unrecorded or "off the books" funds, assets, or personnel benefits such as time off should not be maintained unless permitted by applicable law or regulation and approved by the Chief Legal Officer and Chief Financial Officer.

The Company complies with all laws and regulations regarding the preservation of records. Records should be retained or destroyed only in accordance with the Company's document retention policies. Any questions about these policies should be directed to the Company's Chief Legal Officer.

Business records and communications often become public. Rackspace Technology employees and representatives should avoid exaggeration, defamatory or otherwise derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to all forms of communication including, for example, telephone calls, emails, blog postings, chat rooms, bulletin board postings and instant messaging. Professionalism in all communications is the Company's goal.

Employee information privacy

Rackspace Technology respects the privacy of its employees and representatives and will protect personal and confidential information that it is required to obtain for operating or legal purposes. Access to confidential information, such as personnel and medical records, is strictly limited by Company policy, jurisdictional privacy laws and other data protection regulations and frameworks. Rackspace Technology employees and representatives may have the right to access their own confidential information, but may not access or use the employee records of others unless authorized to do so. While the Company respects employees' privacy, Rackspace Technology expressly reserves the right to inspect its facilities and property, such as computers, mobile phones, telephone records, lockers, emails, files, business documents and work spaces. Rackspace Technology employees and representatives should not expect privacy when using Company-provided services or equipment or when using personal equipment to conduct Company business.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Labor and Human Rights

Rackspace supports and upholds the protection of internationally proclaimed human rights, including those described in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Core Labor Standards. We also comply with applicable regional and national frameworks including the UK Modern Slavery Act 2015.

We strictly prohibit forced labor, child labor, human trafficking, and modern slavery across our operations and global supply chain. We respect freedom of association, work council engagement and the right to collective bargaining, consistent with local law.

We have established confidential, non-retaliatory grievance mechanisms through our Speak Up channels. Our internal compliance team monitors labor rights adherence and conducts periodic audits, including supplier assessments in high-risk regions. Our mandatory Code of Conduct training addresses human rights and labor compliance to all employees annually

Equal Opportunity, Non-Discrimination, and Inclusion

Rackspace is dedicated to fostering a diverse and inclusive workplace where all Rackers are treated with fairness, dignity, and respect. We maintain a zero-tolerance approach toward any form of discrimination, harassment, retaliation or exclusion based on race, color, religion, gender, sexual orientation, age, disability, veteran or military status, national origin, marital & family status or any other characteristics protected by applicable law

All employment decisions, including hiring, promotion, compensation, access to training, and leadership development, are made based on legitimate business factors such as qualifications, merit, performance and business needs, and in compliance with all applicable anti-discrimination and equal employment opportunity laws Rackspace adheres to anti-discrimination laws such as Title VII of the Civil Rights Act, ADA, and global equivalents such as the UK Equality Act 2010 and EU Directive 2000/78/EC and similar applicable legislation around the globe.

Rackspace Managers actively support inclusive hiring practices and mitigate unconscious bias in decision-making. For audit and regulatory purposes, Rackspace tracks grievance escalations, maintains an anonymous Speak Up hotline, and reviews fairness of employment actions across departments regularly.

Fair Wages and Working Hours

Rackspace complies with all applicable laws regarding minimum wage, compensation transparency, working hours, overtime, and other wage-and-hour requirements in each jurisdiction where we operate, including but not limited to requirements under US federal and state law, EU member state law, and local laws in all other countries where we maintain operations..

We provide paid leave in accordance with applicable local law and company policy, which may include vacation/annual leave, parental leave, sick leave, and other statutory or contractual entitlements. Where operationally feasible and consistent with business requirements, we may also offer flexible work scheduling arrangements.

Doing the right thing for stakeholders

Insider trading

(buying or selling stock or other securities while in possession of material non-public information)

The purpose of the Company's Insider Trading Standards and Practices is to establish guidelines to ensure that all Rackspace Technology employees and representatives comply with laws prohibiting insider trading. No Rackspace Technology employee or representative in possession of material, non-public information may trade in the Company's securities (or advise others to trade) from the time they obtain such information until after adequate public disclosure of the information has been made.

Employees who knowingly trade Company securities while in possession of material, non-public information or who tip information to others will be subject to appropriate disciplinary action up to and including termination.

Insider trading is also a criminal offense. The Rackspace Technology Securities Trading Policy also outlines the open and closed trading windows to inform employees when they may and may not trade in the Company's securities.

rackspace technology

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Example:

Question: How do I know whether I am aware of "material" nonpublic information about our company?

Answer: *Information is material if it is important to an investor making a decision about buying or selling our Company's stock. The information includes financial results, business acquisitions, or sales, senior management changes, government investigations, or changes in significant customer and product launches. If you are unsure whether you have material information refrain from trading and consult your manager or the legal department.*

Conflicts of interest

Rackspace Technology expects every employee, officer and Director of the Company to act in the best interests of Rackspace Technology and to protect against conflicts of interest, including even the appearance of a conflict. This means that employees, officers and Directors should avoid any investment, interest, association, or activity that may cause others to doubt the Company's fairness or integrity, or that may interfere with their ability to perform job duties objectively and effectively. Many potential conflicts of interest can be prevented or remedied by making full disclosure of the situation to the employee's supervisor or functional leader.

What are some activities that could be conflicts of interest?

- Owning — directly or indirectly — a significant financial interest in any entity that does business, seeks to do business, or competes with the Company;
- Holding a second job that interferes with employees' ability to do their regular job;
- Employing, consulting, or serving on the board of a competitor, customer, supplier, or other service provider;
- Hiring a supplier, distributor, or other agent managed or owned by a relative or close friend;
- Soliciting or accepting any cash, gifts, entertainment, or benefits that are more than modest in value from any competitor, supplier, or customer;
- Taking personal advantage of what would otherwise be a Rackspace Technology business opportunities; and
- Campaigning for an elected political office while on duty or representing Rackspace Technology.

Example:

Question: My brother owns a business and wants to be a Rackspace Technology supplier. May I direct him to a Rackspace Technology manager?

Answer: *Yes. You may direct your brother to the person who may be interested in his product or service. However, your supervisor and the person making the purchasing decision should be told about the relationship. Normal Rackspace Technology procedures for selecting a vendor must be followed to make sure there is no appearance of special treatment for your brother.*

Selection and use of third parties/ procurement (fair purchasing)

Rackspace Technology engages in open and fair procurement activities regardless of nationality or the size of the transaction. Suppliers are selected competitively based on total value, which includes quality, suitability, performance, service, technology and price.

The Company strives toward establishing mutually beneficial relationships with suppliers based on close cooperation and open communication. Terms and conditions that define the relationship with suppliers are communicated early in the supplier selection process.

U.S. federal law requires that certain government procurement rules related to ethics and business conduct apply to subcontractors.

Proper procurement conduct includes:

- Using established corporate-wide or regional supply (leveraged procurement) agreements;
- Obtaining competitive bids when leveraged procurement agreements do not exist;
- Confirming the financial and legal status of the supplier;
- Verifying quality and service claims on a regular basis;
- Making sure that purchase agreements clearly state the services or products to be provided, the basis for earning payment and the applicable rate or fee;
- Verifying that invoices clearly and fairly represent goods and services provided;
- Avoid exclusive agreements with a single source; and
- Contracts should only be signed by authorized representatives of the Company and in accordance with applicable policies.

rackspace technology

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

The fee or price paid for goods and services by Rackspace Technology must represent the value of the goods or services provided. Payments can only be made to the person or the firm that actually provides the goods or services and must be made in the country where the supplier does business unless prior approval is obtained. Rackspace Technology will not knowingly use suppliers who participate in the following activities:

- Supplying unsafe products or services,
- Violating laws or regulations,
- Using child labor or forced labor, or
- Using physical punishment to discipline employees, even if it is allowed by local law.

For a full list, please see the Supplier Code of Conduct (Rackspace Technology.com/responsibility/people

Customer and supplier relationships

Rackspace Technology employees and representatives must act in a manner that creates value for the Company's customers and helps to build relationships based upon trust. The Company has provided services for many years and has built up significant goodwill over that time. This goodwill is one of its most important assets and all employees and representatives must act to preserve and enhance the Company's reputation.

The Company's suppliers make significant contributions to the Company's success. To create an environment where the Company's suppliers have an incentive to work with the Company, suppliers must be confident that they will be treated lawfully and in an ethical manner. The Company's policy is to select significant suppliers though a competitive bid process where possible. In selecting suppliers, the Company does not discriminate on the basis of age, gender, marital status, race, veteran status, color, gender identity, military status, religion, disability, genetic information, national origin, sexual orientation or any other status protected by the laws or regulations in the locations where Rackspace Technology operates. A supplier to the Company is generally free to sell its products or services to any other party, including Company competitors. In some cases where the products or services have been designed, developed, or manufactured to the Company's specifications, the agreement between the parties may contain restrictions on sales to others where this is lawful to do so.

Protecting customer/third party information privacy

Keeping customer information secure and using it appropriately is a top priority for the Company. Rackspace Technology must safeguard any confidential information customers or third parties share with it. The Company must also ensure that such information is used only for the reasons for which the information was gathered, unless further use is allowed by law.

Customer or third party information is any information about a specific customer or third party, which includes but is not limited to the following: name, address, phone numbers and financial information. Rackspace Technology does not disclose any information about a third party without written approval unless legally required to do so (for example, under a court-issued subpoena).

Example:

Question: I just received a call from a government agency requesting information about one of our customers. Should I provide the requested information?

Answer: *You should contact the Legal Department before providing any information about a customer to a third party. Our Company always seeks to cooperate fully with valid law enforcement investigations in accordance with applicable local law, but it must also take into account certain additional considerations, such as contractual obligations and the potential liability to a customer for providing information beyond that which is appropriate under the law.*

rackspace technology

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Intellectual property and protecting IP

The Company's intellectual property is one of its most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise and other intangible industrial or commercial property. Rackspace Technology employees and representatives must protect and, when appropriate, enforce its intellectual property rights. Rackspace Technology also respects intellectual property belonging to third parties. It is the Company's policy not to knowingly infringe upon the intellectual property rights of others.

Proprietary and confidential information

Confidential information includes all non-public information that might be of use to competitors or harmful to Rackspace Technology or its customers, partners, or suppliers, if disclosed. It also includes information that partners, suppliers and customers have entrusted to the Company. This includes Rackspace Technology employees or representatives trading stocks of other companies about which they learn material, non-public information through the course of their employment or service. The obligation to preserve confidential information continues even after employment or service ends. In connection with this obligation, every employee is required to execute a confidentiality agreement upon commencement of employment with the Company. The terms of the confidentiality agreement (which may be contained within an agreement of employment) should be periodically reviewed for additional detail. Any question about whether information is confidential should be directed to the Chief Legal Officer.

Example:

Question: We hired a person who formerly worked for a competitor. She is aware of proprietary and confidential information about her former employer. Is it okay for her to share this information at Rackspace Technology?

Answer: *No. The Rackspace Technology policy prohibits disclosing proprietary, technical information and confidential business information about her former company. Even if it were accidentally disclosed, you cannot use the information. Simply stated, our Company will treat proprietary and confidential information about other companies in the same way that we expect our former employees to treat our confidential information after leaving.*

rackspace technology

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Protection and proper use of company assets and resources

Rackspace Technology provides an array of information and technology resources intended to maximize its employees' efficiency, such as email, computers, computer applications, networks, the internet, the intranet, facsimile machines, cell phones, other wireless communication devices, telephones and voice mail systems. Please remember that these tools are Company property and must be used in a manner that reflects positively on Rackspace Technology and all who work here. Occasional, limited personal use of these resources is permitted, but that use cannot interfere with employees' work performance or the work performance of their colleagues. Rackspace Technology will not tolerate inappropriate or illegal use of these assets, and reserves the right to take appropriate disciplinary actions, as needed, up to and including termination of employment. Such inappropriate use of these resources can include, but are not limited to, the following:

- Hacking,
- Pirating software or video/audio files,
- Sending inappropriate email,
- Accessing inappropriate web sites (such as those advocating hate, violence, sexually explicit material, or promoting illegal activities) and
- Distributing confidential, proprietary or trade secret information of Rackspace Technology outside the Company.

Rackspace Technology reserves the right to monitor and inspect, without notice, the use of its information and technology resources.

Disclosure

Full, fair, accurate and timely disclosure must be made in the reports and other documents that the Company files with, or submits to, the SEC and in its other public communications. Such disclosure is critical to ensure that the Company maintains its good reputation, complies with its obligations under the securities laws and meets the expectations of its shareholders.

Rackspace Technology employees and representatives responsible for the preparation of such documents and reports and other public communications must exercise the highest standard of care in accordance with the following guidelines:

- all accounting records, and the reports produced from such records, must comply with all applicable laws;
- all accounting records must fairly and accurately reflect the transactions or occurrences to which they relate;
- all accounting records must fairly and accurately reflect in reasonable detail the Company's assets, liabilities, revenues and expenses;
- accounting records must not contain any false or intentionally misleading entries;
- no transactions should be intentionally misclassified as to accounts, departments or accounting periods;
- all transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period;
- no information should be concealed from the internal auditors or the independent auditors; and
- compliance with the Company's internal control over financial reporting and disclosure controls and procedures is required.

Any questions concerning the Company's disclosure controls and procedures and internal controls for financial reporting should be directed to the Rackspace Technology Chief Executive Officer or Chief Financial Officer, as appropriate.

Compliance with amendments of this code

Any material amendment of this Code will be made only by the Board of Directors and will be promptly disclosed as required by law or stock exchange regulation.

rackspace technology®

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Doing the right thing for the marketplace

Communicating with external parties

Rackspace Technology employees are not authorized to speak with the media or other third parties on behalf of the Company, or give the impression that they are speaking on behalf or the Company, unless authorized by the Rackspace Technology Media Relations Department. This includes posts to online forums, social media sites, blogs, chat rooms and bulletin boards. This policy also applies to comments to journalists about specific matters that relate the Rackspace Technology businesses, as well as letters to editors and endorsements of products or services.

To ensure professional handling, all media requests should be directed to the Media Relations Department. Contact information for media inquiries can be found on the public website at: www.rackspace.com/contact under the Media & analyst inquiries section.

Social media

Social media is of growing importance in the marketplace. It enables Rackspace Technology to learn from and share information with the Company's stakeholders, as well as communicate with the public about the Company. In addition to following all Company policies, a general rule to remember when utilizing social media is to think about the effect of statements that one makes on that platform. Keep in mind that these transmissions are permanent and easily transferable and can affect the Company's reputation and relationships with coworkers and customers.

Rackspace Technology employees' postings on internet sites and social media sites such as Facebook or Twitter may include the fact that they work for Rackspace Technology, their job title, a high level job description (e.g., no specific project or initiative details, no proprietary application or software names, etc.) and their general office location. Be mindful not to disclose confidential and proprietary information about Rackspace Technology business, suppliers, or customers.

Antitrust and fair competition

It is Rackspace Technology policy that all Directors, officers and employees comply with antitrust and competition laws. Global antitrust and competition laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace.

Rackspace Technology employees and representatives must be particularly careful when they interact with any employees or representatives of Rackspace Technology competitors. They should use extreme care to avoid any improper discussions with competitors, especially at trade association meetings or other industry or trade events where competitors may interact. If an employee or representative is not careful, they could find that they have violated antitrust and competition laws if they discuss or make an agreement with a competitor regarding:

- Prices or pricing strategy,
- Discounts,
- Terms of customer relationships,
- Sales policies,
- Marketing plans,
- Customer selection,
- Allocating customers or market areas,
- Not hiring former employees, or
- Contract terms and contracting strategies.

Agreements with competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings could be violations. Antitrust violations in the U.S. may be prosecuted criminally as felonies and can result in severe penalties for Rackspace Technology and any associate or other person who participates in a violation.

More specifically, there are no circumstances under which agreements among competitors relating to prices may be found legal. Price fixing is a criminal offense and may subject the Company to substantial fines and penalties and the offending employee to imprisonment and fines. Further, it is a per se violation of antitrust laws for competitors to agree, expressly or by implication, to divide markets by territory or customers as well as for competitors to agree not to do business with a particular customer or supplier.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Obtain and use competitive information fairly

Gathering and using information about Rackspace Technology competitors, often called Competitive Intelligence, is a legitimate business practice. Doing so helps the Company stay competitive in the marketplace; however, one must never use any illegal or unethical means to get information about other companies, nor use information in a misleading way. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows and information publicly available on the Internet. Rackspace Technology employees may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or actually purchasing the ownership of the information. When working with consultants, vendors and other partners, ensure that they understand and follow Rackspace Technology policy on gathering competitive information.

Honest advertising and marketing

Rackspace Technology employees are responsible for accurately representing Rackspace Technology and its products in marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about the Rackspace Technology products, individuals or competitors and their products, services, or employees are inconsistent with the Company's values. Sometimes it is necessary to make comparisons between Rackspace Technology products and its competitors. When this happens, the Company will make factual and accurate statements that can be easily verified or reasonably relied upon. If a competitor makes false or misleading statements about Rackspace Technology or
its products and services, seek guidance from the Chief Legal Officer.

Example:

Question: A competitor is constantly making misleading and disparaging comparisons with our product. What can I do to counter this?

Answer: *We expect our employees to compete vigorously and effectively but never unfairly. Therefore, you must make sure that any comparisons with the competition are fair and accurate. You should also contact the Legal Department since certain legal remedies may be available to our Company.*

Anti-corruption/anti-bribery

Many countries have laws that prohibit bribery, kick-backs and other improper payments. Rackspace Technology requires all employees, officers, agents and independent contractors acting on behalf of Rackspace Technology strictly abide by these laws. No Rackspace Technology employee, officer, agent, or independent contractor acting on the Company's behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as the offer, promise, giving, demand or acceptance of a gift, hospitality, or other business advantage as an inducement for something in return.

The exchange of appropriate gifts and entertainment is often a way to build business relationships. When determining whether a gift or entertainment is appropriate, consider its value and whether its public disclosure would be an embarrassment to the individual or Rackspace Technology. Never allow a gift or entertainment to compromise professional judgment or create the appearance of doing so. See the Gifts and Entertainment section below for more information. It is never acceptable to accept or provide any gift, entertainment, or hospitality which is conditional on receipt of something in return. Receipt of cash by a Rackspace Technology employee is never acceptable regardless of the amount. This would include the receipt of a gift card that contains a logo and can be used at any location for any purpose (e.g., Visa, Mastercard, AMEX, etc.).

Rackspace Technology employees must avoid participating in commercial bribery and kick-backs, or even the appearance of it, in all business dealings. For reference,

- Commercial bribery involves a situation where something of value is given to a current or prospective business partner with the intent to obtain business or influence a business decision; and
- Kickbacks are agreements to return a sum of money to another party in exchange for making or arranging a business transaction.

Even in locations where such activity may not be illegal, it is prohibited by Company policy. Any form of bribery is not only a breach of the Rackspace Technology policy, but may be a criminal offense. Rackspace Technology employees may be prosecuted for such acts. Furthermore, Rackspace Technology may be found liable not only for the acts of its employees, but also for failing to prevent such acts by others working on its behalf.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Offering a gift or entertainment that could be perceived as a bribe becomes especially problematic when dealing with a government official. Government official includes any government employee, candidate for public office, or employee of government-owned or -controlled companies, public international organizations, or political parties. Rackspace Technology employees and representatives must not offer payment or anything of value to a government official for the purpose of influencing official action or securing an improper advantage. If Rackspace Technology cannot obtain a contract without paying a bribe, the employee should walk away from the deal and immediately report the matter to the Chief Legal Officer. The reputation for integrity of Rackspace Technology is more important.

Employees should be alert to a possible violation if any of the following occur:

- A request that a commission be paid in cash, in another name, or to an address in another country;
- Unexplained large expenses on a travel & entertainment expense report;
- An agent demanding a higher than normal commission for a transaction; or
- Any agent or salesperson who says he or she is working with a government official to give the Company the contract.
- Employees should report any acts they believe are in violation of anti-bribery laws to any of the following:
- The Chief Legal Officer, or appropriate legal representative; or
- File a report online at speakuprackspace.com.

Examples:

Question: Can a foreign company pay for an employee's travel to visit their facilities in the foreign country?

Answer: *Yes. Travel must be directly related to promoting, demonstrating, or explaining Rackspace Technology products or services or executing or performing a contract. The amount should be reasonable in light of the business purpose and in line with what that company would reimburse its own employees. The other company should not pay for a side trip to Las Vegas or an employee's shopping trip in Paris. Entertainment must be proportional to the business purpose of a trip.*

Question: What is the difference between a "gift" and a "bribe?"

Answer: *A "gift" is made with "no strings attached" in the interest of, for example, building a business relationship or expressing thanks. A "bribe" occurs if you accept or give something of value to someone in return for something else.*

Gifts and entertainment

Gifts and entertainment can create goodwill in business relationships but can also make it hard to be objective about the person providing them. The choice of suppliers, vendors and partners at Rackspace Technology must be based on objective factors like cost, quality, value, service and ability to deliver. The Company must avoid even the appearance of making business decisions based on gifts received through these relationships. Giving or accepting gifts of nominal value are acceptable as long as the employee's business unit does not have a more stringent requirement. Infrequent business entertainment is appropriate provided it isn't excessive and it does not create the appearance of impropriety. Rackspace Technology has implemented a Gift Register, which will log all requests to give or receive gifts, hospitality, or other awards capable of being perceived to be an inducement and that exceed the de minimus value as set out by the Company.

When giving gifts or offering to entertain a business partner, ensure that the offer does not violate the recipient's own policies. Even simple offers such as purchasing a meal or refreshments for public officials may be unacceptable or even against the law. Contact the Chief Legal Officer before providing any gift or entertainment to a public official.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service

Examples:

Question: I received a gift from a customer, but I am unsure of its value. How do I know if I need to disclose it in the Gift Register?

Answer: *You do not need to seek approval of very modest items, unless other people could reasonably construe them as influencing your business decisions. You should use your best judgment to estimate the value of the gift you received and the need to seek appropriate approval. If in any doubt, always err on the side of asking for approval. If you have any doubt about an item's value or its implications in relation to an actual or perceived conflict of interest, you should discuss the situation with your manager and the Legal Department.*

Question: A supplier just offered me a 15% personal discount. Is this appropriate?

Answer: *You cannot accept a personal discount unless the supplier offers the discount to all Rackspace Technology employees. Contact our Workplace Services team to discuss whether the discount qualifies as a "Racker Deal."*

Anti-money laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery and fraud. Involvement in such activities undermines the Company's integrity, damages its reputation and can expose Rackspace Technology and individuals to severe sanctions. The Company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. Rackspace Technology takes affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Rackspace Technology is committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

Social responsibility

Rackspace Technology is a company that operates with integrity, makes good choices and does the right thing in every aspect of its business. Rackspace Technology employees must continuously challenge themselves to define what it means to be a responsible company and work to translate this definition into behavior and improvements at Rackspace Technology. Rackspace Technology seeks to align its social and environmental efforts with its business goals and continues to develop both qualitative and quantitative metrics to assess progress.

Summary

The Rackspace Technology Code of Conduct is intended to provide all Rackspace Technology employees and representatives with a better understanding of what is expected and to make them aware of the legal and ethical standards that the Company must maintain. Understanding what is expected will better enable them to meet their responsibilities. The Code also enables the Company to continue to grow and prosper in a responsible manner that will benefit Rackspace Technology shareholders, employees, customers and the communities where they live and do business.

Copyright © 2025 Rackspace: Rackspace®, Fanatical Experience® and other Rackspace marks are either registered service marks or service