RACKSPACE TECHNOLOGY
GLOBAL SPEAK UP POLICY

Policy Number: P-GL-CL-004
Effective Date: June 1, 2020
Last Review: April 25, 2025
Document Owner: Legal

Purpose:

This policy provides guidelines and processes for employees to report violations of the Rackspace Technology Code of Business Conduct and Ethics (the "**Code of Conduct**"), employee handbook, and local regulations or policies applicable to the business and operations of Rackspace Technology (the "**Company**"). It also describes what to expect from the Company when a concern is raised.

Affected Parties:

This policy is a global policy that affects all Company directors, officers, employees, contractors, workers, and consultants (collectively "**employees**").

Policy Statement:

Anti-Retaliation

The Company will not tolerate retaliation against any employee who makes a good faith complaint in accordance with this policy. An employee who retaliates against someone who has made a good faith complaint is subject to disciplinary action up to and including termination of employment.

Types of Concerns

Employees may raise concerns about any misconduct or non-compliance with the Company Code of Conduct, employee handbook, regulatory requirements, and other policies under which the Company operates. Various types of concerns may be raised under this policy including, but not limited to:

- Human rights violations
- Discrimination or harassment
- Retaliation
- Conflicts of interest
- Disclosure of confidential information
- Environmental, health, and safety issues
- Bribery
- Violations of competition laws
- Improper use of company resources
- Money laundering or violations of sanctions
- Inadequate recordkeeping
- Insider trading

Actual or suspected misconduct or violations that present an immediate threat to life or property should be reported to the local emergency services phone number (such as 911 in US, or 999 in UK) in the usual way. Reports of personal grievances or legal disputes (for which there are separate policies and procedures) are not covered by this policy. Employees who raise accusations that are knowingly false may be subject to discipline.

Reporting Procedure

The Company recommends that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's manager is in the best position to address an area of concern. However, employees who are not comfortable speaking with their managers or who are not satisfied with their managers' responses should speak with someone in the human resources department, the legal department, or another member of management.

Hotline

Employees may also report a complaint on an anonymous basis by using one of the following:

Website: **https://report.syntrio.com/rackspace**

Toll-Free Telephone:

- **English-speaking USA and Canada: 888-924-2779**
- Spanish-speaking USA and Canada: 800-216-1288
- French-speaking Canada: 855-725-0002
- Spanish-speaking Mexico: 800-681-5340
- International: 800 31 26 4002

Email: reports@syntrio.com (NOTE: reports submitted via email must mention Rackspace, preferably in the subject line)

The website and hotline are operated by specially trained third-party representatives and are available 24 hours a day, seven days a week, with an interpreter available upon request.

Receipt and Treatment of Complaint

The Company takes every report of misconduct seriously. When employees submit reports, they will receive a confirmation of receipt. The report will undergo an initial review and, if necessary, it will be appropriately investigated. The Company may inform employees about the overall findings but, in most cases, will not disclose the full details of the outcome of the case to protect confidentiality and the privacy or legal rights of those involved.

All concerns are logged into a case management system. Depending on the nature, urgency, and potential impact of your concern, a senior leader for the Vice President of Internal Audit, Chief Legal Officer, Chief People Officer, or their designee, will review the complaint and assign someone with familiarity or expertise with the underlying subject matter to investigate. The Chief Legal Officer will raise concerns directly to the audit committee of the Company's board of directors as necessary.

These parties may direct that the designated individual conduct the investigation at the direction of, or in conjunction with, a Company attorney. If the complaint contains a credible allegation of actual or potential criminal wrongdoing, the investigating employee should immediately contact the Chief Legal Officer. In such cases, the Chief Legal Officer will instigate a further procedure for investigating the complaint that may include retaining outside counsel and engaging external authorities. For all other complaints, the Vice President of Internal Audit, Chief Legal Officer, or their designee, shall determine a suitable enforcement action or resolution following appropriate investigation.

Retention of Records

Actual and suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously, unless prohibited by local law. Reports of violations or suspected violations will be kept confidential to the extent practicable, including records that are retained consistent with the need to conduct an adequate investigation.

Review and Maintenance:

This document should be reviewed periodically, as needed. Revisions, waivers, or exceptions must be approved by the Document Owner.

Enforcement:

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. Any contractor found to have knowingly violated this policy may be subject to release from contract.

Contact:

Questions regarding this policy can be addressed to corporatecompliance@rackspace.com.

Related Documents (if any):

Code of Conduct and Business Ethics Policy
Personal Data Protection Standard

Version History

Date	Version	Review and Revision Comments
May 29, 2020	1.0	New policy final version and signature
November 16, 2021	1.1	Annual review, no changes
May 23, 2023	1.2	Reformatting, title changes, new signatory
April 25, 2025	1.3	Updated with new hotline details