

Progress®

Code of Conduct & Business Ethics



Letter From Our CEO

Everything we do at Progress Software Corporation ("Progress" or the "Company") is built around people. Our culture is built on a set of values that guide our day-to-day interactions with customers and fellow Progressers, as well as how we conduct our work with integrity to meet the highest ethical standards.

This Code of Conduct and Business Ethics (the "Code of Conduct" or "Code") serves as a summary of how we work as an organization and as individuals. This Code of Conduct, and the related policies that underpin it, applies to all employees, officers and the Board of Directors of Progress and provides important guidance for day-to-day decision making. In addition to promoting honest and ethical conduct, this Code of Conduct is designed to encourage behavior consistent with our corporate values: **Courage, Teamwork, and Accountability**. We do this by:

- Creating an inclusive culture, where we value our differences, treat one another with respect and welcome all ideas of thought;
- Conducting business in an honest and ethical manner, including the ethical handling of conflicts of interests;
- Complying with all applicable laws, rules and regulations, including our disclosure obligations as a public company;
- Being accountable for adherence to this Code of Conduct and reporting suspected violations in a timely manner.

If you are unsure whether an action is ethical or have a question about embodying ethical conduct, please reach out to your manager or the Compliance Office (see Speaking Up Without Fear).

Now, more than ever, a great company requires an unwavering commitment to the highest ethical standards. Each of us is accountable to do the right thing and we should hold each other accountable to that standard.

Yogesh Gupta
President and Chief Executive Officer
Progress Software Corporation

About Progress

Est. 1981

NASDAQ: PRGS

Headquartered in Burlington, Massachusetts, USA

Offices across North America, Europe, Latin America and Asia Pacific

3,000 + employees

© 2026 Progress. All Rights Reserved.

Table of Contents

I. About The Code of Conduct

A. Using the Code to Make Good Decisions / 6

B. Our Compliance Structure / 7

C. Underlying Policies / 7

D. Speaking Up Without Fear / 8

1. Policy Against Retaliation / 9

E. Failure to Comply / 9

II. Interacting with Customers and Counterparties

A. Entering Into Agreements / 10

B. Competing Fairly / 11

C. Business Entertainment and Gifts / 12

D. Questionable or Improper Payments / 13

E. Suppliers and Business Partners / 14

III. Environmental, Social, Governance ("ESG")

A. Environmental / 16

B. Social / 16

1. Human Rights and Fair Labor / 16
2. Human Trafficking and Slavery / 16
3. Political Contributions / 16

C. Governance / 17

1. Communications with our Investors and the Public / 17
2. Social Media / 17
3. Investments and Trading on Inside Information / 18
4. Blackouts on Trading in Progress Stock / 19
5. Accurate Books and Records / 19

IV. Responsibilities To Each Other

A. Creating a Safe and Productive Work Environment / 21

1. Progress Employer Value Proposition / 21
2. Working under the Influence / 22
3. Guns, Weapons and Threats / 23

B. Anti-discrimination/Anti-harassment / 23

C. Manager Responsibilities / 24

1. Serving as Ethical Role Models / 24
2. Handling Employee Reports / 25

© 2026 Progress. All Rights Reserved.

V. Responsibilities To The Company

A. Conflicts of Interest / 26

1. What is a Conflict of Interest? / 27

2. Corporate Opportunities / 27

3. Outside Interests and Employment / 27

4. Personal and Family Relationships / 28

5. Government Employment / 29

6. Reporting / 30

B. Safeguarding Company Resources / 30

C. Protecting Proprietary and Confidential Information / 32

1. Our Information / 32

2. Information Owned by Others / 32

3. Receipt of Third-Party Confidential Information / 32

4. Compliance with Agreements / 33

5. Third-Party Software / 33

D. Privacy and Data Protection / 34

1. Employee Information / 35

2. Workplace Privacy / 35

VI. Regulatory Responsibilities

A. Export Controls, Sanctions and Anti-Boycott / 36

B. Anti-Money Laundering / 37

C. Anti-Bribery Laws / 38

D. Antitrust Laws / 38

E. Legal Holds / 39

F. Government Customer and Relations / 40

© 2026 Progress. All Rights Reserved.



About The Code of Conduct

Progress believes that a fundamental element of business success is honest and ethical behavior by our employees in the conduct of our business. To promote and ensure compliance with the highest standards of conduct and applicable legal requirements, we have developed this Code of Conduct. This Code of Conduct applies to all Progress employees, officers, and our Board of Directors. Although this Code is intended to provide guidance when making business decisions, it cannot and is not intended to address every situation. Please see Speaking Up Without Fear to learn how to reach out with questions or concerns.

We make revisions and updates to this Code from time to time. If we make any material revisions to this Code, we will notify employees via a company-wide email communication and will make the revised Code available on MyProgress as well as the Investor Relations page of our website. You are responsible for compliance with the most current version of this Code at all times.

This Code of Ethics and Business Conduct is intended to be Progress' written code of ethics, as required under Section 406 of the Sarbanes-Oxley Act of 2002, and in compliance with the standards set forth in Securities and Exchange Commission Regulation S-K Item 406.

© 2026 Progress. All Rights Reserved.

Using the Code to Make Good Decisions

Behaving ethically and with integrity is everyone's responsibility. All employees, officers, and Board members are expected to know and follow this Code. The policies contained or referenced in this Code will help you to make decisions and choices that incorporate Progress' values into your everyday job. It is important that you understand our position on basic ethical and legal issues that affect the way we do business globally.

We expect you to comply with all local, state, U.S. federal, country-specific and international laws, as well as other appropriate private and public regulatory agency requirements, and to act in accordance with both the letter and the spirit of those laws and regulations. You should let common sense and good judgment be your guide when faced with questions of business conduct. You should seek guidance whenever you are unsure of what the right decision or action is.

When faced with a difficult decision, use these questions to guide your response.

1. Is the action legal?
2. Is the action ethical?
3. Does it comply with Progress' values?
4. Am I treating others the way I would want to be treated?
5. Would this action or decision be viewed favorably by third-parties if it became publicly known?
6. If I do it, would I feel comfortable describing it to my family or friends?

If your answer is YES to all of these questions, it is usually okay to proceed.

If your answer is NO to any of these questions, you must stop and reconsider.

If you are unsure, you should discuss the matter with your manager, a member of the Human Resources Team or the Compliance Office.

Remember, it is always appropriate to ask for guidance.

© 2026 Progress. All Rights Reserved.

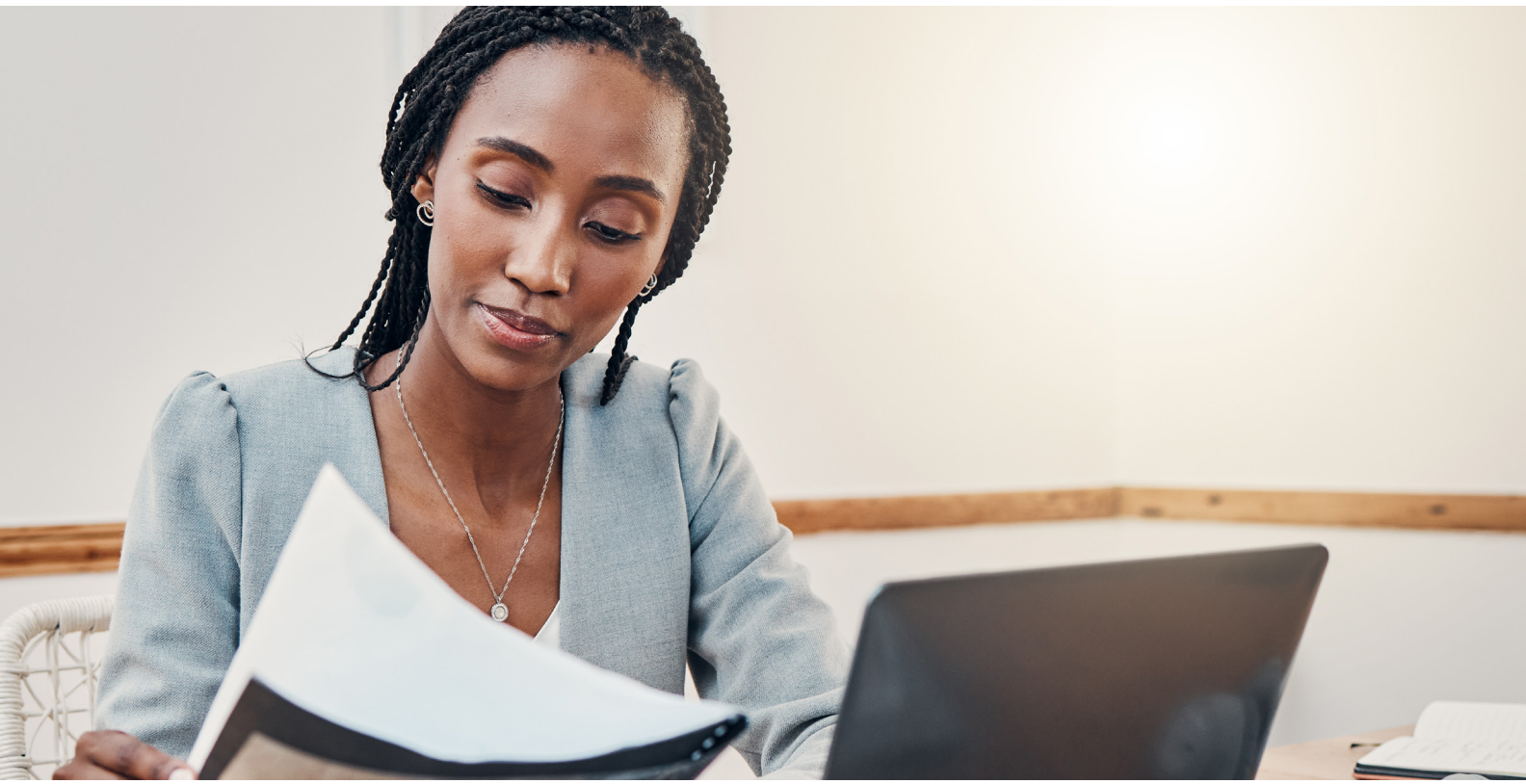
Our Compliance Structure

Compliance Office

Chief Compliance Officer (CCO)

Chief Human Resources Officer (CHRO)

Senior Director of Internal Audit



Underlying Policies

The Code of Conduct is Progress' umbrella policy. In addition to this Code, we have other policies relating to conduct that all employees must periodically review. These policies can be accessed by employees on MyProgress.

© 2026 Progress. All Rights Reserved.

Speaking Up Without Fear

A critical component of your ethical responsibility is to help enforce this Code. You should be alert to possible violations and you must report any possible violations without unreasonable delay. Please note that it is a violation of the Code for any person to remain silent and/or fail to report a violation if observed. You can make a report in one of the following ways:



- Contact your manager
- Contact any Human Resources Team representative
- Contact the Chief Compliance Officer or any member of the Compliance Office[1]
- Contact EthicsPoint, our 24/7 independent third-party ethics and compliance hotline and incident management system (reports may be made anonymously)[2]

All reports will be handled confidentially and sent to the Compliance Office for immediate review. Those reports relating to accounting and auditing matters, or actions of Progress' directors or executive officers, will also be sent to the Chairman of the Audit Committee of the Board of Directors for immediate review. The Compliance Office (and Audit Committee where applicable) shall promptly take all appropriate actions necessary to investigate all reports, in compliance with local law, applicable Progress policies, and any required workers' representative consultation requirements. These investigators will act objectively in determining and examining the facts through interviews and/or a review of communications and documents related to the matter. The Chief Compliance Officer (and Board of Directors where applicable) shall then determine whether there has been a violation and shall take all appropriate preventative and/or disciplinary actions related to the matter.

If appropriate, Progress may also self-report compliance violations, in a timely manner, to applicable government authorities and cooperate with any resulting official proceedings. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by the Chief Compliance Officer (and Board of Directors where applicable).

[1] Please address written notifications to: Progress Software Corporation, Attn: Chief Compliance Officer, 15 Wayside Rd, Suite 400, Burlington, MA 01803, USA

[2] EthicsPoint may be accessed online at progress.ethicspoint.com or toll-free at 877-277-3165.

© 2026 Progress. All Rights Reserved.

Please note that it is a violation of the Code for any person to knowingly make a false report or to make a report with reckless disregard as to whether the report is true.

Policy Against Retaliation

Progress will not tolerate threats or acts of retaliation against any person who has reported a violation or a suspected violation of applicable laws, this Code or other Company policies. Employees, officers, and members of our Board of Directors are all prohibited from retaliating or taking adverse action against anyone raising suspected conduct violations or helping to resolve a conduct concern. Any individual found to have engaged in retaliation against an employee for raising, in good faith, a conduct concern, or for participating in the investigation of such a concern, may be subject to discipline up to and including termination of employment. Any individual who believes that they have been subjected to retaliation is encouraged to report the matter as soon as possible through the channels outlined above.

Failure to Comply

All employees are expected to follow our policies. Failure to comply with laws or Company policies (including timely completion of mandatory trainings) will result in disciplinary action, which can range from remedial training and coaching up to and including termination and/or disclosure of evidence to law enforcement officials or other third parties, which may result in civil and/or criminal penalties imposed by a governmental agency or a court. Disciplinary action may also be taken for the deliberate failure to report a violation promptly, knowingly submitting a false or reckless claim of a violation, failure by a manager to detect and report a violation due to lack of appropriate supervision, withholding of relevant information regarding a violation, failure to cooperate in the investigation of a known or suspected violation or acting against an employee who reports a violation.

There may be special or extraordinary circumstances where a waiver of a provision of this Code is appropriate. Any request for a waiver should be in writing and should be directed to our Chief Compliance Officer, who is responsible for maintaining a complete record of all requests for waivers and the disposition of those requests. No waiver applicable to a Board member or executive officer will be effective unless it is in writing, approved by the full Board of Directors and signed by the Chief Compliance Officer. Any waiver applicable to a Board member or executive officer may need to be disclosed as required by U.S. Securities and Exchange Commission (“SEC”) and Nasdaq rules.

© 2026 Progress. All Rights Reserved.



Interacting with Customers and Counterparties

Entering Into Agreements

We require employees to compete fairly and ethically for all business opportunities. Employees involved in the sale or licensing of products/services, the negotiation of agreements or the delivery of services to customers are expected to understand and honor the terms of our contractual agreements. In addition, each employee must ensure all statements, communications and representations made to customers are accurate and truthful.

© 2026 Progress. All Rights Reserved.

Before executing, modifying or amending any of our contracts, all appropriate reviews and approvals must be obtained. Side letters, side agreements, handshake arrangements or other agreements, whether written or verbal, that are not documented within the approved contract or order documents, are strictly prohibited. These types of unauthorized arrangements are a violation of this Code for which significant repercussions, up to and including termination, are possible. Passive acceptance or knowledge of such arrangements, even where there is no intent to harm Progress or the customer/ partner, will likewise be considered a violation of this Code.

Only certain individuals have authority to sign contracts, commit Progress to acquiring products or services, or make commitments to third parties on Progress' behalf. Please consult with the Legal Department to determine the proper signing authority and signature process for a specific agreement.

Competing Fairly

It is our policy to sell our products and services on their own merits. False or misleading statements or inferences about competitors, their products or their services are improper.

It is not unusual to acquire information about many other organizations, including competitors, in the normal course of business. We collect information on competitors from a variety of legitimate sources to evaluate the relative merits of our own products, services, and marketing methods. This activity is proper and necessary in a competitive system. There are, however, limits to the ways that information should be acquired and used, especially information about competitors. You must not use improper means to acquire a competitor's trade secrets or other confidential information. Illegal practices such as trespassing, burglary, wiretapping, bribery, and stealing are obviously wrong, as is the hiring of a competitor's employees for the purpose of acquiring that competitor's confidential information. Improper solicitation or receipt of confidential data from a competitor's employees or from any of our clients is also wrong. Progress does not condone any form of questionable intelligence gathering.

Please also see Regulatory Responsibilities for additional guidance regarding anti-competitive behaviors.

© 2026 Progress. All Rights Reserved.

Business Entertainment and Gifts

Exchanging gifts and entertainment with customers and suppliers is not uncommon, however, this practice must be handled carefully and responsibly to avoid any actual or perceived conflicts of interest. We expect you to use good judgment and moderation when exchanging gifts or entertainment, keeping in mind that the recipient's employer may forbid such practices (it is your responsibility to learn the policy of our partners, customers, vendors, etc. before giving or accepting such gifts or entertainment).

In general, gifts and entertainment should: (i) have a clear business purpose, (ii) be consistent with accepted business practice, (iii) comply with applicable laws and ethical standards, and (iv) be moderate, not placing the recipient under any obligation to an individual or company doing business or attempting to do business together.

Any solicitation of gifts or special treatment from suppliers or customers is strictly prohibited. If you are unsure as to whether the offer or acceptance of any gift and/or entertainment would be appropriate, please consult with your manager or the Compliance Office.

Gifts and entertainment should never be provided to any government employees. Please be aware that some counterparties may be quasi-governmental in nature, or their employees may hold governmental roles – it is your responsibility to know your customer and to reach out to your manager or the Compliance Office for guidance.



© 2026 Progress. All Rights Reserved.



Acceptable forms of gifts and/or entertainment that may be offered or accepted include (without limitation):

- Occasional reasonable meals with a business associate who is not a Progress employee;
- Tickets for ordinary sports, theater, and other cultural events; and
- Gifts or promotional items, provided they are of only nominal value (no more than $150 in value).

Examples of unacceptable forms of gifts and/or entertainment, whether offered or accepted, include:

- Money, loans, cash equivalents (such as loans, stock, stock options, or other monetary instruments such as bank checks, traveler's checks, money orders, investment securities or negotiable instruments) or other special treatment in dealings with vendors, customers or competitors;
- Gifts or entertainment or other situations that are unsavory, or that otherwise violate our commitment to diversity and mutual respect, or which would reasonably cause any customer or our employee to feel uncomfortable (e.g., "adult entertainment");
- Gifts or entertainment to any government employees, and
- Gifts or entertainment that would be illegal under applicable law.

Records of all gifts must be kept and provided to the Compliance Office, Legal Team, and/or our external auditors and counsel upon request.

Don't Make Questionable or Improper Payments

We prohibit the use of bribes, kickbacks or other improper payments directly or indirectly to any individual or organization, including government officials, political parties, partners, and distributors. The acceptance by an employee, officer, or board member, of any form of bribe or kickback is also prohibited.

See Regulatory Responsibilities - Anti-Bribery Laws below for additional guidance.

© 2026 Progress. All Rights Reserved.

Suppliers and Business Partners

Our suppliers and partners have an impact on our operations, reputation, and the communities in which we operate. New suppliers and business partners are selected objectively based on merit and are only onboarded following the completion of a due diligence process. We expect our suppliers and business partners to adhere to the Progress Supplier Code of Conduct, comply with all applicable laws and regulations, respect human rights, and maintain high standards of quality, safety, and environmental responsibility.

Progress has a responsibility to monitor performance and promote compliance with laws and our policies. There is information throughout this Code of Conduct that addresses relationships with suppliers and our business partners. If you work with any of our suppliers or business partners, you are encouraged to engage in open communication with them to ensure they understand their compliance obligations. If you observe or suspect anything that could put our Company, employees, or customers at risk you are required to report your concerns to your manager or the Compliance Office without delay.



© 2026 Progress. All Rights Reserved.



Environmental, Social, Governance (“ESG”)

Progress strives to identify and implement sustainable and socially responsible business practices and ground our company in good governance. At Progress we greatly value inclusion, diversity and encourage the mutual respect of others. We strongly condemn all forms of racism, discrimination, hatred and inhumanity. We equally reject violence in all conceivable formats. These toxic forces undermine the values we hold so dear and work exhaustively to cultivate in our company and our communities.

© 2026 Progress. All Rights Reserved.

Environmental

Progress is committed to compliance with applicable environmental laws and strives to conduct business in an environmentally responsible manner for the benefit of its employees, customers, communities, shareholders and the environment. To aid Progress in these efforts all employees are encouraged to use energy wisely and efficiently employing appropriate technology and best practices to minimize risks of environmental impact. For detailed updates, please visit: www.progress.com/social-responsibility

Social

Please See Responsibilities To Each Other for additional information regarding our responsibilities towards fellow Progressers.

Human Rights and Fair Labor

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. We ask that our suppliers and direct contractors demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

Human Trafficking and Slavery

Progress policy and the laws of certain regions (e.g., the UK Modern Slavery Act of 2015) prohibit human trafficking and slavery. Progress does not knowingly engage in slavery or human trafficking in any part of its business or in any of its supply chains (see www.progress.com/company/MSA_Statement).

Political Contributions

Progress will not make contributions or payments, or otherwise give any endorsement of support that would be considered a contribution, directly or indirectly to political parties or candidates (including through intermediary organizations, such as political action committees, campaign funds, or trade or industry associations).

© 2026 Progress. All Rights Reserved.

Governance

Communications with our Investors and the Public

Never make misrepresentations or dishonest or misleading statements to anyone, whether verbally or in writing. If you are unsure, confirm information before providing it to others. If you are involved in bid preparations or contract negotiations, be certain that the information shared on behalf of Progress is accurate.

Progress is a publicly-traded company, so those speaking on behalf of the Company are expected to comply with Regulation FD and avoid disclosure of material non-public information to selective individuals or entities outside the Company. Disclosures of material information should only be made at the direction of the Disclosure Committee and in compliance with applicable laws and regulations (for example, in our SEC filings). Information is generally considered "material" if it would be expected to affect the investment or voting decisions of a reasonable investor, or if the disclosure of the information would be expected to significantly alter the total mix of the information in the marketplace about the Company. If you are ever in doubt, please reach out to a member of the Legal Team for guidance.

All corporate, investor, sales, marketing and other communications and filings with government entities must be timely, accurate, complete, understandable, and in no way deceptive. All statements made in such disclosures must have reasonable support and may not contain misleading statements or omit information, the absence of which is likely to make the statements misleading. These standards also apply when using and posting to social media and other platforms.

Social Media

Social media enables us to learn from and share information with our stakeholders, as well as communicate with the public about our Company. However, be mindful that social media posts may have unintended consequences that could impact Progress, its customers and other stakeholders, and you as an author/poster of social media content.



© 2026 Progress. All Rights Reserved.

- Do not disclose any confidential and/or proprietary Company information (even if it does not rise to the level of material non-public information)
- Make it clear that you are speaking for yourself and not on behalf of Progress.
- If you publish content to any external sites (e.g, LinkedIn) that concerns your work or subjects associated with Progress, you must use a disclaimer.

Please review Progress' Social Media Policy (accessible through the Policies page on MyProgress) and contact the Corporate Communications and Legal Teams for further information.

Investments and Trading on Inside Information

Progress is a publicly-traded company, so you are required to comply with applicable securities laws, including those prohibiting trading based on material non-public information (i.e., insider trading). What information might be considered “material” is a nuanced analysis; however, to guide your everyday thinking, information is generally considered “material” if it would be expected to affect the investment or voting decisions of a reasonable investor. The information is material if it alone could affect the decision, but it could also be material if the information, when combined with existing public information, alters the total mix of information about Progress in a way that could impact the investment or voting decision of a reasonable investor (e.g., an incremental fact that indicates a pattern could be material).

Any investment (direct or indirect) in one of our competitors, customers, suppliers or partners creates a potential conflict of interest and the potential for insider trading violations. If you have decision-making responsibilities or significant influence over any transactions with a business that Progress does business with, you are required to disclose all pertinent facts regarding your investment in such business.

Disclosure must be made to your manager and the Compliance Office. The terms of the proposed transaction and any material change in our relationship must be approved by a level of management that does not have a direct or indirect financial interest in the business, and also by the Compliance Office.

- **Investments in Public Companies:** Passive investments of not more than 1 percent of the total outstanding shares of any company listed on a national or international securities exchange or quoted daily by Nasdaq or any other quotation system, including our vendors, customers, partners, or competitors, are permitted without approval. Any investment in more than 1 percent of the total outstanding shares of any such public company must be disclosed to, and reviewed by, the Compliance Office.

© 2026 Progress. All Rights Reserved.

- **Investments in Private Companies:** Investments in privately held companies that are partners, significant customers or significant suppliers of Progress, companies that are current or likely competitors of Progress, or companies that are reasonably likely to be potential candidates for acquisition by Progress must be disclosed to, and reviewed by, the Compliance Office. If an investment is made in a company that becomes subject to this disclosure requirement after the investment is made, the investment must be disclosed at that time.

- **Changed Circumstances:** If you happen to have an investment in a company and you transition into a role that would place you in a conflict-of-interest position, you should disclose the situation to your manager and the Compliance Office. These situations will be resolved on a case-by-case basis.

Blackouts on Trading in Progress Stock

Depending on your role or participation in certain special projects, you may periodically be subject to restrictions on your ability to trade Progress stock. Please see our Insider Trading Policy (accessible through the Policies page on MyProgress) for additional details. If you are ever in doubt, please reach out to a member of the Legal Team for guidance.

Accurate Books and Records

Accurate, objective, fair, relevant, timely and complete books and records are essential for our operations and allow us to meet our obligations to our stockholders, management, employees, partners, customers, and various governmental agencies. Our records include contracts, customer orders, invoices, shipping documents, employee information, payroll records, financial data, and various forms of other essential data.

The Company's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must fairly present our financial condition and results of operations and comply with applicable federal securities laws and SEC rules. Therefore, you must ensure that any documentation or report that you submit or approve (e.g., customer orders, invoices, financial information, etc.), are complete and accurate and contain all proper authorizations and signatures, because we use these documents to prepare our reported financial statements.

© 2026 Progress. All Rights Reserved.

Each director, officer and employee who is involved in the disclosure process must: (i) be familiar with and comply with Progress' disclosure controls and procedures and our internal control over financial reporting; and (ii) take all necessary steps to ensure that all filings with the SEC and all other public communications about Progress' financial and business conditions provide full, fair, accurate, timely and understandable disclosure. Each director, officer and employee who contributes in any way to the preparation or verification of our financial statements and other financial information must ensure that Progress' books, records and accounts are accurately maintained. Each director, officer and employee must cooperate fully with our accounting and internal audit departments, as well as our independent public accountants and counsel.

You may not provide false data, or omit relevant information, that would lead to false or erroneous entries in our records. Those who are found to have submitted or approved any documentation, report or other information containing materially inaccurate, materially incomplete, or other improper data or unauthorized signatures will be subject to disciplinary measures. If you are asked to create, or assist in creating, data or records that differ from your understanding of the facts, bring the matter to the attention of the Chief Compliance Officer or report it using EthicsPoint.

© 2026 Progress. All Rights Reserved.



Responsibilities To Each Other

Creating a Safe and Productive Work Environment

Progress Employer Value Proposition

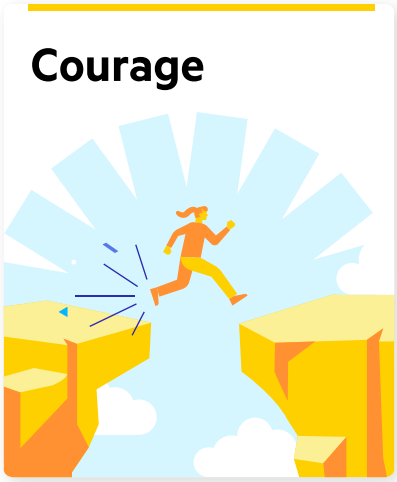
Progress strives to be a diverse, equitable and inclusive company, where every employee–no matter their experience, perspective, identity or belief–has a sense of belonging. Our Employer Value Proposition is our promise to employees to treat them fair and equitably and how we expect employees to act when representing the Progress business.

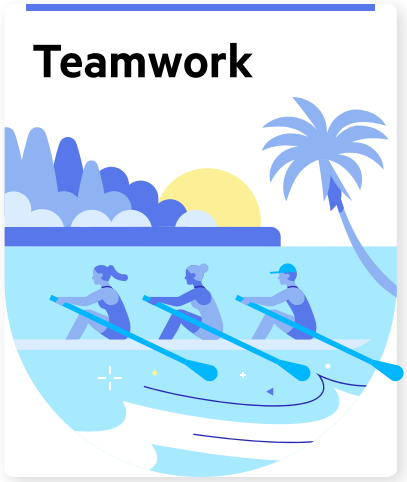
© 2026 Progress. All Rights Reserved.

Progress strives to provide a safe and healthy workplace and is committed to meeting and exceeding industry standards in all areas of employee safety and well-being. We expect all employees to exercise good judgment to ensure the safety and welfare of fellow employees and to maintain a cooperative, efficient, positive and productive work environment and business organization.

These standards apply while working on our premises, at offsite locations where business is being conducted, at Company-sponsored business and social events, and/or at any other place where you are representing Progress. Employees who engage in misconduct or whose behavior is unsatisfactory, or unbecoming may be subject to corrective action, up to and including termination. In addition to the standards contained in this section of the Code, all employees must review and comply with the standards set forth in the Employee Protection Policy.

Our values drive our behavior everyday, keeping us connected, inspired and moving forward. They also inform our decision making.







Working Under the Influence

Whether in the office or working remotely - please use good judgment regarding drugs, alcohol and other substances (regardless of legality); never consume alcohol or abuse substances in a way that leads to impaired performance or inappropriate behavior, or that endangers the safety of others or violates the law. If you choose to consume alcohol at Company events, you are obligated to always maintain proper conduct and professionalism. Use of alcohol in a privately owned vehicle while engaged in Company business is prohibited, as is the operation of any vehicle while on Progress business while under the influence of alcohol.

© 2026 Progress. All Rights Reserved.

Guns, Weapons, and Threats

Weapons including, but not limited to, firearms, ammunition, knives, explosives, fireworks, incendiary devices, dangerous chemicals, and other items that are intended to inflict harm are forbidden on Progress premises, at any Progress events, in our Company vehicles, or while conducting Company business in accordance with state laws. This prohibition does not apply to knives or other tools which are required, permitted or provided by Progress as part of your job assignment. Progress does not tolerate acts or threats of violence, including extreme or inappropriate verbal or physical threats, intimidation, harassment and/or coercion, this includes any talk of violence or joking about violence. Behavior that threatens the safety of people or property, or has the potential to become violent, should immediately be reported to your manager and/or the Human Resources Team.

Anti-discrimination/Anti-harassment

At Progress, we do not tolerate any form of discrimination or harassment. The following is a non-exhaustive list of unacceptable behavior:

- Any unwelcome behavior, such as verbal or physical conduct designed to threaten, intimidate or coerce
- Forcing impromptu interactions (e.g., calls, video calls, instant messages, meetings) during non-working hours and/or unrelated to the individual's work/role
- Verbal taunting (including racial, ethnic, gender or religious slurs, inappropriate jokes or language)
- Negative stereotyping (e.g., regarding race, culture, country of origin, gender, age, sexual orientation, etc.)
- Jokes and casual gestures that mask biases
- Along with these, Progress takes a hard stance against all forms of sexual harassment. This may include:
    a. Unwelcome sexual advances, requests for sexual favors or unwelcome demands for dates
    b. Sharing of sexually oriented messages, emails or media
    c. Dressing inappropriately during meetings and events (whether attending in-person or virtually) that makes the other participants uncomfortable
    d. Taking photos or making recordings at meetings or events, or taking screen captures during video calls, without permission and circulating them on social media
    e. Watching or sharing (even if unintentional sharing) of inappropriate or insensitive material during Company time, or on/from company devices at anytime.
    f. Other verbal or physical conduct of a sexual nature where submission to the conduct is either an explicit or implicit term or condition of employment; or submission to or rejection of the conduct by an individual is used as the basis for making employment decisions affecting such individual ("quid pro quo" or "this for that").

© 2026 Progress. All Rights Reserved.

Progress has adopted a Policy Opposing Harassment which applies to all employees, contractors, vendors, agencies and anyone else acting on behalf of Progress or its subsidiaries. You must review and comply with this policy.

If you believe your rights or the rights of a coworker have been violated or if you have any other workplace concerns, you should consult your manager (or another member of your management chain), a member of the Human Resources Team, a Compliance Team member, or file a report through EthicsPoint. Progress recognizes the sensitive nature of these claims and will work to ensure confidential treatment of the allegations to protect all involved.

Retaliation against any employee, who reports harassment, will not be tolerated.



Manager Responsibilities

If you are a manager, you have special responsibilities - the way you display your commitment to our values sets the standards for ethical behavior for your team.

Serving as Ethical Role Models

- **Be Informative:** Help your team understand the seriousness of Progress' expectations for ethical conduct. Communicate your personal support for Company values and purpose and be clear that you expect actions that are consistent with those values.

- **Be Alert:** Always be on the lookout for situations or actions that may be unethical or potentially damaging to the business. Contact the Human Resources Team immediately

© 2026 Progress. All Rights Reserved.

if you suspect such situations and be careful to avoid even the appearance of implicit approval.

- **Be Open:** Assure your team that you are willing to listen, even if they have something difficult to say. Foster an inclusive environment where your team members feel comfortable asking questions and expressing their ideas and opinions.

Handling Employee Reports

When your team member raises a concern, you must:

- **Listen Carefully:** Thank the person for making the difficult decision to speak up, even if you disagree with them. Listen closely to what they have to say and show that you're focused on resolving the issue.

- **Maintain Confidentiality:** To the extent possible, protect the employee's privacy. Avoid discussing the conversation with others on your team.

- **Be Objective:** Continue to treat all team members with the same degree of fairness even if they've reported a concern or are the subject of the report.

- **Escalate to the Right Channels:** While you may be tempted to take ownership of the concern, you must assess whether it needs to be escalated to the Human Resources Team or Compliance Office. If you have questions or aren't sure if you can resolve a concern on your own, consult your Human Resources Team partner or contact the Compliance Office.

© 2026 Progress. All Rights Reserved.



Responsibilities To The Company

Conflicts of Interest

You should be sensitive to situations that create the potential for, or the appearance of, conflicts between your personal interests and Progress' interests.

© 2026 Progress. All Rights Reserved.

What is a Conflict of Interest?

A conflict of interest generally occurs when a personal or family relationship, substantial financial or personal interest, or any activity performed outside of your employment might influence a business decision made on our behalf, result in the misuse of Company assets, or negatively impact our business. It is not possible to describe every potential conflict of interest, but this section provides guidance on situations that are likely to result in a conflict. You are expected to identify potential conflicts and comply with Progress policy regardless of whether a potential conflict is specifically addressed in this document.

When trying to assess whether a situation constitutes a conflict of interest, ask yourself:

- Would this relationship or situation embarrass me or Progress if it showed up on the front page of a newspaper, in a blog or on social media?
- Am I reluctant to disclose the relationship or situation to my manager or the Compliance Office?
- Could the potential relationship or situation create an incentive for me, or be perceived by others to create an incentive for me, to benefit myself, my friends or family or an associated business, at Progress' expense?

If the answer to any of these questions is "yes," the relationship or situation is likely to create a conflict of interest, and you should avoid it.

Corporate Opportunities

You may not exploit for your own personal gain any business or investment opportunities that are offered to you or discovered through the use of Company property, information or position, unless the opportunity is disclosed fully to your manager and the Compliance Office. You may not use Company property, information or position for improper personal gain, and you may not compete with Progress directly or indirectly.

Outside Interests and Employment

You should avoid engaging in any outside business interest or additional employment that would impair your ability to satisfactorily carry out your responsibilities at Progress. It is strictly prohibited to have a substantial business interest in, or to provide service or assistance to, or be employed with, a competitor of ours while you are employed by Progress. It is also prohibited to have a substantial business interest in, or be employed

© 2026 Progress. All Rights Reserved.

with, a customer or supplier of ours while you are employed by Progress, unless prior approval has been obtained from your manager and the Compliance Office.

We encourage you to be active in industry, charitable and civic associations. This can include service on boards of directors of outside organizations. However, it is a conflict of interest to serve as a director of any company that competes with Progress. You may serve as a director of any other entity, including a supplier, customer or other business partner of ours, but only if doing so will not conflict or otherwise interfere with your duties and you first obtain approval from your manager and the Compliance Office prior to joining any such boards of directors. Prior approvals may be rescinded at any time.

Progress does not discriminate, and does not tolerate discrimination, based on political affiliation, activities, or views. You may participate in political activities on an individual basis, on your own time, with your own resources. However, Progress does not sanction or support the political activities of its employees. You may not use Progress assets, including time at work or the use of Progress offices or equipment, to run for political office or to contribute to a political candidate, political action committee, or ballot measure. Additionally, you must use care not to give the impression that Progress supports or endorses any candidate, campaign or policy issue with which you are personally involved.

All employees must be aware that pursuing any outside interests, including political activities, can have implications for both the individual and the Company. Activities that impair an employee's ability to satisfactorily carry out their responsibilities at Progress, create an actual or perceived conflict of interest, or otherwise result in the employee's noncompliance with company policies, may result in administrative and/or disciplinary actions, from remedial training or reassignment, up to and including termination of employment.

Personal and Family Relationships

In general, participation in business relationships involving either a close friend or family member of yours, or an entity controlled by a family member, should be avoided. If a competitive bidding process establishes that a transaction with a family member or related entity offers superior price or service, you must still obtain approval from your manager and the Compliance Office before entering into an agreement.

The mere fact that a relative, spouse/significant other or close friend works for us or becomes our supplier, customer, partner or competitor does not mean there is a conflict of interest. However, you must not supervise or be in a position to influence the salary or conditions of employment of such individuals. Additionally, if you are involved in the business relationship with a company for which any such individuals work, it can be very sensitive. The right thing to do in that situation is to discuss the relationship with your manager and the Compliance Office.

© 2026 Progress. All Rights Reserved.

We also understand that co-workers can become friends, and that some employees may establish dating relationships with co-workers. Employees are expected to exercise good judgment in pursuing romantic relationships with co-workers, including but not limited to ensuring compliance with Progress' Anti-discrimination/Anti-harassment policies. Additionally, you should recognize that romantic relationships between co-workers can, depending on the work roles and respective positions of the dating co-workers, create an actual or apparent conflict of interest. Romantic relationships with individuals that you supervise, directly or indirectly, are an actual conflict of interest and must be avoided. If a dating relationship does develop, it may require changes to work arrangements or even the termination of employment of either or both individuals involved.

Government Employment

We are compliant with laws and regulations relating to the employment of or acquisition of services from government employees. Conflicts of interests must be avoided in connection with the employment of or acquisition of services from current or former government employees and military personnel. In many instances, these rules apply to contact or negotiations with current government employees to discuss potential employment with the company, or the use of former government employees as consultants or subcontractors. These restrictions may severely limit the roles and responsibilities that such former government employees may perform on our behalf. When in doubt, please consult the People or Legal Teams for guidance.

© 2026 Progress. All Rights Reserved.

Reporting

You are required to promptly report to your manager any situation that may represent a conflict of interest. If there is any uncertainty whether a specific dealing may constitute a conflict of interest, you are encouraged to discuss the matter with your manager, any Human Resources Team representative or the Compliance Office.

Safeguarding Company Resources

You are expected to exercise good judgment and discretion in your use of Company assets and resources to ensure that they are used responsibly and for legitimate business purposes. You are also expected to extend the same degree of care to assets entrusted to Progress by others.

Such assets, whether owned by or entrusted to Progress, include but are not limited to:

- **Physical assets** - office furnishings, equipment and supplies
- **Technology assets** - computer hardware, software and information systems
- **Financial assets** - cash, securities and credit cards
- **Confidential information** - customer relationships, products, services, systems and other data
- **Intellectual Property** - patents, copyrights, trademarks, trade secrets and proprietary information.

Progress assets should only be used for the conduct of Progress business and initiatives, and only in compliance with applicable laws and regulations. All physical and technology assets provided by the Company, whether used in an office or remotely, are Company property and are provided for business use. You must never sell or give them away (regardless of their condition or value), unless you are authorized to do so. Additionally, you must never lend these assets to anyone for any reason regardless of how long or short a period.

When you access Progress networks from remote locations (for example, at home or from other non-Company locations), you are subject to the same standards of use as are employees who access our networks while on Company premises. The data accessed, transmitted, received, and stored by or within Progress systems, and the devices that access or are supported by those systems (such as computers and mobile phones) must be protected.

You must safeguard the following:

© 2026 Progress. All Rights Reserved.

- Passwords: You are responsible for your corporate credentials. Passwords must meet corporate standards and must be kept private, and therefore not shared or coded into programs (unless technically unfeasible) or written down. You must not share your passwords with anyone at any time. You must immediately inform IT Security by email if you suspect that a password has been compromised.

- Mobile Security: It is extremely important that you treat any mobile device that you use to connect to Progress networks or conduct work related activities like a Progress corporate IT device.



Mobile device security can be breached and infected just like a workstation - since such devices may be used to connect to a Progress network and/or may contain copies of Progress confidential or proprietary information, you must never click links, download files, or execute programs on your mobile device unless you are certain of the source and legitimacy of the content. You must always protect such devices from loss, theft or damage and report any loss or theft immediately to IT Security by email.

Acceptable Usage: You are not permitted to use Progress information technology and communications systems for activities that are harmful, unlawful, unethical, immoral or otherwise contrary to this Code.

Examples of Inappropriate Computer Use:

- Any unauthorized transmission of personal data, Company data, confidential information or trade secrets.
- Accessing inappropriate internet sites.
- Sending inappropriate e-mails (including chain letters or other widespread non-business communications) or sending or posting other items that are hostile, harassing, offensive, threatening, or otherwise inappropriate.
- Initiating or participating in any malicious, unauthorized, or fraudulent use of Company resources.
- Using Progress electronic media and resources for non-business purposes.

Although we respect your privacy, there may be circumstances where it is necessary for us to access, monitor and examine electronic communications either stored or in transit via our Company resources. We may need to take these actions to ensure compliance with foreign and domestic regulations as well as our policies, to investigate and resolve network issues or to prevent system misuse.

© 2026 Progress. All Rights Reserved.

Protecting Proprietary and Confidential Information

Our Information

Our confidential and proprietary information is an important asset in our operations. When you joined Progress, you signed an agreement to protect and hold confidential our proprietary information. Under that agreement and Progress polices, the unauthorized disclosure of confidential or proprietary information is strictly prohibited, and you may not use our confidential information to benefit anyone other than Progress.

At times, we may be required to disclose confidential information to potential business partners. The potential benefits and risks of disclosure must be reviewed with your manager. If disclosure of confidential information is necessary, you must contact the Legal Team to ensure that an appropriate nondisclosure agreement has been signed by all parties.

Everyone is responsible for ensuring confidential information is protected from theft, damage, unauthorized disclosure or inappropriate use. This information should always be stored in a safe manner. In addition, remember that you can be overheard, and device screens can sometimes be seen, in public places such as on public transportation and in restaurants. Therefore, you should avoid discussing or reviewing confidential information in such locations.

Please note, nothing in the Code is intended, nor should be interpreted, as a restraint on your ability to report suspected wrongdoing to the SEC.

Protecting Information Owned by Others

We respect the rights of other companies to their proprietary information, and we require our employees to fully comply with both the spirit and the letter of U.S. and foreign laws and regulations protecting such rights, including patent, trademark and copyright laws.

Receipt of Third-Party Confidential Information

You should treat any non-public information that you have about other companies with sensitivity and discretion. Use any such information in the proper context, making it available to other Progress employees only when there is a legitimate need to know.

© 2026 Progress. All Rights Reserved.

Compliance with Agreements

To the extent that you are a party to a valid agreement with someone other than Progress (e.g., a former employer) that restricts you from performing activities for us (including, for example, using specified information or performing recruiting activities), you must bring that agreement to the attention of your manager and Human Resources Team representative, and use reasonable efforts to comply with that agreement.

Third-Party Software

To avoid violating the law and/or the licensing requirements of third parties, as well as to minimize the risk of computer viruses, you should take special care when acquiring or accessing software (which includes computer programs, databases, cloud-based software, and related documentation) from third parties. This applies both to purchased software and to software that is made available without charge, via the Internet or otherwise. The terms and conditions of software license agreements--such as provisions not to copy or distribute programs--must be reviewed and followed.

In no event, should you copy any such software into any development work you do for us, unless we have entered into an agreement with the owner of such software permitting such activity, or, in the case of “open source” or “free” software, such use has been approved in accordance with our policies regarding such software. If you have any questions concerning your right to use a third party’s software, contact the Legal Team.



© 2026 Progress. All Rights Reserved.

Privacy and Data Protection

Privacy and data protection are critically important to our business. Progress is committed to complying with applicable privacy laws in the countries where we conduct business, including laws regarding the cross-border transfer of certain personal information.

Personal data is information that can directly or indirectly identify an individual, such as name, contact information, and health-related information. Employees who handle the personal data of others, must:

- Act in accordance with applicable laws and be mindful of any relevant contractual obligations (e.g., confidentiality or non-disclosure agreements that Progress is party to);
- Collect, use and process such information only for legitimate business purposes;
- Provide clear and accurate privacy notices when collecting or processing personal data;
- Limit access to the information to those who have a legitimate business purpose for seeing the information;
- Securely store, transmit and destroy personal information in accordance with applicable policies and laws; and
- Take care to prevent unauthorized disclosure.

We have adopted and implemented certain policies, procedures and protocols relating to how we access, collect, store, use, transmit and protect personal information, including the Privacy Policy and Cookie Policy (both of which can be found on the Company's Privacy Center). If you believe that personal information has been wrongly disseminated, used or otherwise compromised, please contact the Privacy Office, the Legal Department or any member of the Compliance Office immediately.

© 2026 Progress. All Rights Reserved.

Employee Information

Progress respects the confidentiality of the personal information of employees. This includes employee medical and personnel records. Access to personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Requests for confidential employee information from anyone outside our Company under any circumstances must be approved in accordance with our policies.

Workplace Privacy

Any expectation of privacy in a workplace environment (including in Progress' technology environment) depends on facts and circumstances (e.g., reasonable suspicion of misconduct, measures taken as a response to an incident, or other necessary measures to protect Progress' legitimate interests and/or our employees, customers or other third parties). Any limitations of privacy rights are applied in accordance with the applicable laws.



© 2026 Progress. All Rights Reserved.



Regulatory Responsibilities

Progress is a global company, and we serve partners and end users world-wide, including governments and government-owned enterprises. We are bound by various laws and regulations in a multitude of jurisdictions. Violation of these laws may result in civil and criminal penalties, so please reach out to the Legal Team for guidance if you have any questions. If you become aware of a violation or potential violation of these laws, you must report the information immediately to the Compliance Office.

Export Controls, Sanctions and Anti-Boycott

The U.S. (and other jurisdictions from which Progress affiliates operate) regulates the export of products and technologies to other countries. Periodically, these regulatory authorities will impose sanctions or other restrictions that prohibit or limit the export of goods (including software), technology, information, and services to specific countries or their nationals.

© 2026 Progress. All Rights Reserved.

Progress and our affiliates may not export, directly or indirectly (e.g., through a partner or a customer's headquarter office), any goods or services in violation of these restrictions. Our Legal Team maintains information regarding countries to which products may not be shipped and any questions concerning export controls should be directed to the Legal Team.

The U.S. also has anti-boycott laws prohibiting individuals and entities from participating in a boycott that the U.S. does not support. Anti-boycott laws help prevent U.S. companies from being used to implement the foreign policies of other nations that run counter to U.S. policy. Progress does not cooperate with foreign boycotts that are not approved by the U.S. government. If you receive a request related to any boycott, immediately contact the Legal Team and do not attempt to respond to the request.

Anti-Money Laundering

Anti-money laundering ("AML") laws and regulations drive transparency of payments and parties in transactions. Progress is committed to full compliance with AML requirements in the jurisdictions where we operate and will conduct business only with reputable customers involved in legitimate business activities and transactions. We have taken affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Progress will not knowingly engage in transactions that facilitate money laundering or result in unlawful diversion of funds; such activities undermine our integrity, damage our reputation and can expose Progress and individuals to severe sanctions.

Red flags to report immediately to the Legal Team:

- Requests for cash payment or check from an unknown third party
- Complex payment patterns
- Unusual transfers to or from countries not related to the transaction
- Customers who seem eager to avoid recordkeeping requirements
- Transactions involving locations previously associated with money laundering or tax evasion
- Transactions that are inconsistent with usual business practices, or which do not match the customer's or client's normal pattern of activity

© 2026 Progress. All Rights Reserved.

Anti-Bribery Laws

As noted previously, we prohibit the use of bribes, kickbacks or other improper payments made directly or indirectly to any individual or organization. Such payments violate the laws of many countries, including the U.S. Foreign Corrupt Practice Act (FCPA) and the UK Bribery Act 2010.

Examples of prohibited payments:

- Cash, cash equivalents and extravagant gifts - sending a $300 gift card to a customer during the holidays, even if there is no purchase under consideration.
- A modest gift, if intended to influence the customer's purchase decision - sending a $50 gift card to a customer with a note that reads "Hoping this helps you finalize your purchasing plans for the coming quarter."
- Any gift or payment to a government employee or someone who has decision making influence/authority for government acts or purchases (e.g. gifting a wristwatch to a municipal clerk who is responsible for preparing a special event permit that Progress requires; or sending a $25 gift card to the U.S. Navy's civilian purchasing agent.) It is important to beware of and to recognize and report any special payment requests from third parties related to doing business with government agencies.
- Antibribery laws may not be well enforced or certain payments may be considered "standard practice" or an "acceptable cost of doing business" in certain regions; that is not an excuse.

Antitrust Laws

Laws governing competition (also known as antitrust, monopoly, fair trade or cartel laws) exist in most of the countries in which we operate and are intended to prevent interference with a competitive market system. Under these laws, companies may not enter into agreements with other companies (including their distributors and resellers), however informally, which unreasonably restrict the functioning of the competitive system. Please use caution in the following areas:

© 2026 Progress. All Rights Reserved.

I. **Agreements with Competitors:** Agreements with competitors that seek to limit or restrict competition (such as by fixing or controlling prices; allocating products, markets or territories; or boycotting certain customers or suppliers) are often illegal and should not be attempted.

II. **Information Sharing:** The sharing of competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors at trade and industry conferences could be considered anti-competitive and, thus, illegal. The same is also true of written statements (in emails, chats, presentations, memos, etc.) that wrongly suggest that we have few or no competitors, or that we seek to harm our competitors or improperly exploit our success.

III. **Agreements with Customers and Partners:** Certain understandings between a company and a customer or business partner (such as agreements that fix prices for the resale of products) are also considered anti-competitive and illegal. You must not discuss or agree to these types of restrictive understandings with a customer or partner.

Legal Holds

Special circumstances (e.g., litigation or government investigations) may arise where it becomes necessary for a legal hold to be imposed. A legal hold suspends the destruction of certain documents in order to preserve appropriate records. Our Legal Team determines and identifies what types of Company records or documents are required to be placed under a legal hold. Every employee, agent and contractor must comply with the announcement of a legal hold.

© 2026 Progress. All Rights Reserved.

Government Customers and Relations

Complex rules and monetary limits apply to government procurement and government relations. You must be familiar with applicable rules and regulations before engaging in these activities. Please reach out to the Legal Team for assistance if you have questions.

It is important to remember that the term "government" includes more than just federal, national, state, and local governments and their agencies (such as postal, law enforcement, and military agencies). Rules and regulations related to government procurement also apply to entities that are owned or controlled by governments (such as, state universities, state-run television stations, public utilities, etc.), public international organizations (such as the World Bank, World Health Organization, regional organizations such as NATO, and international charities like UNICEF), candidates for political office, individuals holding a political seat, employees of any of these organizations and their immediate family members, members of royal families, etc.

You must never submit inaccurate or incomplete information in response to government requests for proposals. You must not solicit or accept any confidential information about government selection processes or competitor proposals or share such information with unauthorized parties, without first consulting the Legal team and confirming you are able to seek and have custody of such information. If you receive such information without authorization, contact the Compliance Office without delay. As noted elsewhere in this Code of Conduct, do not authorize, offer, promise, or provide anything of value, including gifts, meals or entertainment to a government employee. If the Company is awarded a government contract, the Company and all employees and contractors must comply with the terms of the contract and all regulatory obligations. If you are contacted by a government representative regarding an investigation, audit or request for information or documents, you must direct them immediately to the Legal team for assistance and guidance. You should not share or relay information regarding such contact to anyone else unless and until you have received written direction from Legal to do so.

© 2026 Progress. All Rights Reserved.

Progress That's Built Around You



About Progress Software

Progress Software (Nasdaq: PRGS) empowers organizations to achieve transformational success in the face of disruptive change. Our software enables our customers to develop, deploy and manage responsible AI-powered applications and personalized digital experiences with agility and ease. Businesses of all sizes get a trusted provider in Progress, with the products, expertise and vision they need to turn AI disruption into a competitive advantage. Millions of developers and technologists at hundreds of thousands of organizations depend on Progress every day. Learn more at www.progress.com

© 2026 Progress Software Corporation and/or its subsidiaries or affiliates.
All rights reserved. Rev 2026/09 | 1213531369571494PUB

/progresssw
/progresssw
/progresssw
/progress-software
/progress_sw_

Progress