



## CODE OF ETHICS AND BUSINESS CONDUCT

### PURPOSE

The purpose of the Code of Ethics and Business Conduct (the "Code") is to:

- ▶ Set forth requirements for honest and ethical conduct, including the proper handling of actual or apparent conflicts of interest between personal and professional relationships;
- ▶ Ensure compliance with applicable governmental laws, rules and regulations;
- ▶ Provide accountability for adherence to the Code;
- ▶ Provide guidance for reporting violations of the Code to management, the General Counsel and/or anonymous reporting systems.

### SCOPE

The Code is applicable to directors, officers and employees of Duck Creek Technologies, Inc., each of its subsidiaries, and any controlled ventures (collectively, the "Company" or "Duck Creek").

### DEFINITIONS

*Confidential Information:* Confidential Information refers to any non-public information, relating to the Company's operations, services, products, research and development, processes, policies, know-how, designs, drawings, data, formulas, methods, training, improvements, discoveries, software code, marketing information, marketing plans, research, business plans, budgets, strategies, financial information, pricing information, pricing methodology, discounts, manuals, forms, sales techniques, contact information of the Company's customers, vendors and suppliers, customer lists, customer needs and/or preferences, customer special requirements, employee information, advisor information, service provider information and information regarding providers of debt, equity or other financing to the Company.

*Prohibited Drug:* Prohibited Drug refers to any substance that is illegal, controlled, prohibited or banned (including, but not limited to, legal substances such as solvents which can be misused and prescription drugs which are used in a manner other than as prescribed).

*Retaliation:* Retaliation refers to adverse employment actions of any kind, including any form of discipline, reprisal or intimidation (or any threat thereof) for engaging in any activity protected by applicable law.

*Weapon:* Weapon refers to any instrument or device that is designed, modified, displayed, or used with intent to do or threaten bodily harm, including, but not limited to, firearms (whether functioning, replicas or toys), knives, stun-guns (e.g., tasers), chemicals, explosives, ammunition, martial arts weapons, swords, bows, arrows and similar objects. Since weapon technology can change rapidly, and

because the Code cannot address every conceivable circumstance, it will be necessary for all employees to use good judgment in determining whether or not an instrument or device comprises a Weapon for the purposes of the Code.

Note - Any other terms used or capitalized in the Code and not otherwise defined shall have the respective meanings of such terms as set forth in the Company's Meta Policy and/or any other related policy as set forth in the Related Policies and Procedures section of the Code.

## POLICY

### THREE PILLARS

The Company is committed to the following three pillars:

- ▶ Honestly Built;
- ▶ People at the Core; and
- ▶ Tomorrow Ready.

Consistent with these three pillars, the Company operates honestly, with respect for all people, and constantly strives for improvement. Duck Creek maintains a safe and non-threatening workplace and aims to provide the highest quality of service in an environment of respect and collaboration. Unlawful harassment, discrimination, or Retaliation, or disrespectful behavior, of any kind, as further described in the Company's Discrimination and Harassment Policy, are prohibited by Duck Creek.

### RESPONSIBILITIES TO THE COMPANY

#### ▶ Conflicts of Interest

A conflict of interest is a situation where a director's, officer's or employee's personal or professional interests (or those of an immediate family member or other close relative or close friend or any other person who may act on such director's, officer's or employee's behalf) can affect his or her ability to act in Duck Creek's best interests, or interfere or even appear to interfere with personal objectivity and obligations to Duck Creek. All directors, officers and employees should engage in honest and ethical conduct, including avoiding any actual or apparent conflicts of interest. It is a duty for all employees to act in Duck Creek's best interests at all times. Employees and officers may not hold outside employment that interferes with their job performance at the Company. Officers and directors should also refer to the Company's Policy and Procedures with Respect to Related Person Transactions for additional information.

#### *Duty to Disclose Conflicts of Interest*

All directors, officers and employees are obligated to review their personal and employment situations and should promptly report to the General Counsel any material transaction or relationship that could be expected to give rise to an actual or apparent conflict of interest.

#### *Corporate Opportunities*

If you become aware of a business or financial opportunity as part of your work with the Company, you are not permitted to use any such information or take that opportunity for your own personal gain. You should not use Company property, information or your position for personal gain and should not compete with the Company or any of its affiliates directly or indirectly.

► **Bribery and Corruption**

Duck Creek is committed to work against corruption in all its forms. Duck Creek and its officers, directors, employees and agents must comply with the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act 2010, laws enacted to implement the Organization for Economic Cooperation and Development ("OECD") Convention on Combating Bribery of Public Officials in International Business Transactions, the U.N. Convention against Corruption, and any other similar laws, rules or regulations in countries where the Company conducts business that prohibit bribery and corruption, and the Code.

Duck Creek and its officers, directors, employees, and agents are prohibited from offering, promising, authorizing or giving anything of value (such as money, gifts, entertainment, travel, any advantage, benefits in kind, or other benefits) to a Government Official (defined below), directly or indirectly, with the intention of influencing him or her in his or her capacity as a Government Official to obtain or retain business or a business advantage. A "Government Official" is defined to include an official, employee or representative of any government or government-owned or government-controlled entity.

Duck Creek and its officers, directors, employees, and agents also may not offer, promise, give or receive anything of value to or from a third party, person, customer, vendor or supplier for the Company with the intent of obtaining favorable treatment from the recipient or to secure business. This includes payment in cash or in kind, including goods, services, the use of another company's or person's property or forgiving any sort of obligation.

Please refer to the Company's Anti-Corruption Compliance Policy, which sets out employees' responsibilities in relation to ensuring compliance with applicable anti-bribery laws, rules and regulations.

► **Travel, Meals, Entertainment and Gifts**

Travel, meals, entertainment, and gifts are "things of value" and may never be accepted, provided, promised, offered or authorized for the purpose of improperly obtaining or retaining business or securing any improper advantage from Government Officials or private persons. Use of Duck Creek funds for lavish meals, extravagant travel and entertainment or gifts of cash or cash equivalents (e.g., gift cards) to external persons are prohibited. Moreover, U.S. Government Officials or employees may be subject to strict prohibitions or dollar limits on gifts or entertainment that may be given to them. In addition, under the honest service fraud provisions of the mail and wire fraud statutes, you may not provide a gift that is linked to a particular government decision.

Any travel, meal, entertainment or gift must be:

- In connection with the promotion, demonstration or explanation of Duck Creek's products or services, or in connection with the execution or performance of a contract;
- Not intended to secure an improper advantage or otherwise inappropriately influence the recipient;
- Permitted by law;
- Permitted by the recipient's policies and by any agreements between Duck Creek and the recipient's employer;
- Reasonable in value and appropriate under the circumstances; and

- ▶ Accurately and fully documented in writing and reflected in Duck Creek's books and records.

However, and even if the foregoing requirements are met, prior written approval from the General Counsel is required if the intended recipient is an official, employee or representative of a U.S. or non-U.S. government or government-owned entity, or any of their family members. Spouses and other family members of Government Officials should not be included in any entertainment or travel. For more information, please refer to the Company's Travel and Entertainment Policy.

#### ▶ **Facilitation Payments**

Facilitating payments are small payments to low-level Government Officials to expedite a routine governmental action that Duck Creek is entitled to in any event, and which the Government Officials do not have discretion to deny. Duck Creek prohibits facilitating payments.

If Duck Creek personnel become aware of a demand for a facilitating payment, or of an instance in which such a payment has been made, they must report such incident to the General Counsel or via the Company's toll-free anonymous hotline, provided herein.

#### ▶ **Political Activities and Contributions**

Duck Creek will not make political contributions in the form of monetary contributions (e.g., in the form of a corporate check or a purchase of tickets to a political fundraiser) or "in-kind" contributions (e.g., the use of corporate personnel or facilities, or payment for services) that are prohibited under applicable federal or state law. To ensure that Duck Creek is in compliance with these laws, all employees of Duck Creek must comply with the following requirements:

- ▶ Without prior approval from the Legal Department, no political contribution or expense may be incurred by Duck Creek on behalf of, and no corporate assets, funds, facilities, or personnel may be used to benefit, any candidate, campaign, political party, political committee (e.g., a PAC or ballot measure committee), or any entity exempt from federal income taxes under Section 527 of the Internal Revenue Code.
- ▶ You have the right to voluntarily participate in the political process and make personal contributions, provided that if you anticipate causing any corporate funds or assets (such as corporate facilities or personnel) to be used in connection with your volunteer activity, you must obtain prior approval from the Legal Department.
- ▶ You may not work on a political fundraiser or other campaign activity during working hours without prior approval from the Legal Department.
- ▶ If you choose to participate in the political process, you must do so as an individual, not as a representative of Duck Creek. Any overt, visible and partisan political activity that could cause someone to believe that your actions reflect the views or position of Duck Creek requires the prior approval of the Legal Department.
- ▶ You may not make a political contribution to obtain or retain business or to obtain any other improper advantage.

- ▶ Duck Creek shall not directly or indirectly reimburse or otherwise compensate any person for his or her personal political contributions.
- ▶ No one at Duck Creek may force an employee to contribute to, support, or oppose any political group or candidate or threaten reprisal for failure to so comply.

▶ **Proper Use of Duck Creek Assets**

Duck Creek's assets include physical assets, such as equipment and buildings, as well as funds, intellectual property, trade secrets and Confidential Information. Duck Creek does not allow the unauthorized removal of the Company's assets or physical property from its premises or the unauthorized sharing of its Confidential Information or intellectual property. To ensure proper protection of Duck Creek employees and assets, Duck Creek regulates the possession and movement of assets, subject to limitations imposed by applicable law and Company policy.

Areas subject to search include an employee's workspace, desk, computer, file cabinet, locker, or similar place where employees may place personal possessions, whether or not such places are locked. Such inspections or searches may also include, but are not limited to, computer files, hard drives, e-mail, other electronic mail, chats and smartphones. All of the computing resources used to provide computing and network connections throughout the organization are the property of the Company and are intended for use by employees to conduct Duck Creek's business.

Every Duck Creek employee is responsible for protecting the assets of Duck Creek. Each employee is also responsible for understanding Duck Creek's obligations for protecting assets that have been entrusted to it by customers, suppliers or business partners, and for treating them accordingly.

Duck Creek's assets must be adequately safeguarded. This means locking up and securing valuable assets. Duck Creek's assets may not be sold, borrowed, lent, given away or modified in any way that would impact their value, unless there is a good business reason and prior approval was obtained from the department manager.

▶ **Company Books and Records**

The Company requires honest and accurate recording and reporting of information, in alignment with finance and accounting procedures, in order to make responsible business decisions. All Company books, records, accounts and financial statements must be maintained in reasonable detail, must properly reflect the transactions that occurred, must be properly authorized and must conform to both applicable legal requirements and Duck Creek's internal controls. An employee must not enter false or misleading information into Company records.

Since accurate records play a vital role in assuring the maintenance of high ethical standards, employees have responsibility to record transactions accurately, completely and in a timely manner. Never make false or artificial entries in any Duck Creek records or establish an account on behalf of the Company with the understanding that any part of the payment or account is to be used for a purpose other than as described by the supporting documents. Never understate or overstate reports of sales or expenses, or alter any documents used to support those reports.

Duck Creek's financial statements must fairly and accurately present the financial condition of the business. Reporting Duck Creek's proper financial condition is a fundamental aspect of each employee's responsibilities. Reporting false information is strictly prohibited.

Duck Creek maintains a system of internal controls to assure appropriate authorization, recording, and accountability of Duck Creek's assets. Duck Creek's employees are required to act in accordance with the Company's internal control system. If an employee is aware or suspects of anyone falsifying Duck Creek's books and records, the employee must report this immediately to his/her immediate manager, the General Counsel and/or anonymous reporting systems. For more information, please refer to the Company's Disclosure Controls and Procedures Policy.

▶ **Public Company Reporting**

Full, fair, accurate and timely disclosure must be made in the reports and other documents that the Company files with, or submits to, the U.S. Securities and Exchange Commission 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 stakeholders.

▶ **Use of Trademarks, Copyrights, and other Intellectual Property**

All writings, inventions, ideas and other work product that an employee develops during his/her association with Duck Creek that may be applied to the Company's business belong to the Company. Intellectual property rights created, developed, invented, or discovered during the employee's association with Duck Creek, such as patents, copyrights, trademarks and trade secrets, also belong to the Company, and by executing the Certification attached to the Code, employees are assigning such work product and intellectual property to the Company. Additional policies and procedures may be issued from time to time to support the Code. For additional guidance please refer to the Company's Patents, Copyrights, Trademarks, and Intellectual Property Policy.

▶ **Computer and Communication Resources**

Duck Creek employees are required to act lawfully at all times and exercise sound judgment in their use of computer and communication resources.

Specifically prohibited behaviors include, but are not limited to:

- ▶ Any conduct in violation of applicable law (such as accessing the internet or technology in violation of copyright laws);
- ▶ Any conduct in violation of any of Duck Creek's policies or the Code;
- ▶ Accessing, downloading, or distributing pornographic, obscene, defamatory, discriminatory, harassing, or other inappropriate materials of any kind;
- ▶ Installing and using peer-to-peer file sharing software that has not been approved for use by the Company's Information Technology department;
- ▶ Uninstalling, disabling or circumventing Company workstation security software;
- ▶ Gaining unauthorized access to Company, client, or other third party devices or technology;
- ▶ Jeopardizing the reputation of the Company or harassing individuals by transmitting messages that could be construed as libelous, slanderous, defamatory, threatening, abusive, or otherwise inappropriate; and

- ▶ Violating the identified and communicated acceptable use policies of a client or other third party (e.g. service provider) when using their resources.

Please refer to the Company's Internet and Acceptable Use Policy for additional information regarding appropriate use of Duck Creek computer and communication resources.

## **CONFIDENTIALITY AND PERMITTED DISCLOSURES**

### **▶ Confidentiality**

Employees shall protect Confidential Information that is entrusted to them or to which they are otherwise exposed. During the term of employment or at any time thereafter, employees may not use or disclose any confidential Company, client, or third party information to anyone outside the Company, except as authorized.

Within the Company, disclosures of Confidential Information should occur only on an as-needed basis, and when such discussions are necessary, they should never be held in a public place (such as an elevator or cafeteria) under circumstances where they could be overheard. If an employee leaves the Company for any reason, he/she must return all Company, client, and third party materials acquired during his/her association with the Company.

If there is any doubt as to whether information obtained in connection with a Duck Creek activity is Confidential Information, the individual should assume it is confidential and treat it as such, unless advised otherwise. Duck Creek commits to providing confidentiality to customers, and all employees have the responsibility to maintain this commitment.

### **▶ Permitted Disclosures**

Nothing in the Code shall prohibit or restrict any employee from (i) responding to a valid subpoena, court order or similar legal process; provided, that in the event of any such required disclosure, such employee must promptly notify the Company in writing of the information such employee is required to disclose and to whom such employee is requested to disclose such information so that the Company has a reasonable opportunity to challenge the subpoena, court order or similar legal process; or (ii) making any voluntary disclosure of information or documents concerning possible violations of law to any governmental agency or legislative body, or any self-regulatory organization, in each case, without advance notice to the Company. Nothing in the Code shall restrict any employee from speaking freely with law enforcement, the Equal Employment Opportunity Commission, the state Division of Human Rights, a local commission on human rights, or an attorney retained by an employee.

Pursuant to 18 U.S.C. § 1833(b), nothing in the Code will subject any employee to criminal or civil liability under any federal or state trade secret law for the disclosure of a trade secret of the Company that (i) is made (A) in confidence to a federal, state, or local government official, either directly or indirectly, or to an employee's attorney and (B) solely for the purpose of reporting or investigating a suspected violation of law; or (ii) is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding. If an employee files a lawsuit for Retaliation by the Company for reporting a suspected violation of law, such employee may disclose the trade secret to such employee's attorney and use the trade secret information in the court proceeding if such employee (x) files any document containing the trade secret under seal, and (y) does not disclose the trade secret, except pursuant to court order. The Code is not intended to conflict with 18 U.S.C. § 1833(b) or create liability for disclosures of trade secrets that are expressly allowed by such section.

## **FAIR DEALINGS**

### **▶ Antitrust**

The purpose of antitrust laws in the United States and other countries where Duck Creek does business is to encourage competition by prohibiting activities that unreasonably restrain trade or limit competition. The antitrust laws prohibit any agreement, understanding, or arrangement, expressed or implied, formal or informal, among competitors in restraint of trade or commerce. They also prohibit certain business practices and arrangements that restrict trade by improperly foreclosing competitors. It is Duck Creek policy to compete vigorously, while at the same time adhering to both the letter and spirit of antitrust laws. All employees must avoid even the appearance of engaging in the restraint of trade, as any purported violation of the antitrust laws may expose Duck Creek and individual employees to significant liabilities, including criminal penalties, large fines and civil lawsuits. All questions in this regard should be referred to the Company's Legal department.

### **▶ Conspiracies and Collaborations Among Competitors**

One of the primary goals of the antitrust laws is to promote and preserve each competitor's independence when making decisions on price, output, and other competitively sensitive factors. No agreement (written or otherwise, expressed or implied) should be made on behalf of Duck Creek or its employees that limits independent judgment or restricts trade. This includes, but is not limited to, agreements among competitors to:

- ▶ Fix, raise or maintain prices for products or services;
- ▶ Restrict the output or supply of products or services;
- ▶ Divide a market for customers, territories, products or purchases;
- ▶ Refrain from soliciting one another's customers or hiring one another's employees;
- ▶ Boycott or refuse to deal with another party; and
- ▶ Fix or reduce employee compensation.

The exchange of sensitive information with competitors regarding topics such as prices, profit margins, output levels, billing or advertising practices can violate antitrust and competition laws, as can creating a standard with the purpose and effect of harming competition. Employees must notify the General Counsel if they are aware of any competitively sensitive topics being discussed without oversight by an antitrust lawyer. Similarly, employees must consult the General Counsel before negotiating or entering into a joint venture or other business relationship with a competitor.

### **▶ Other Agreements**

The antitrust laws also prohibit certain agreements or arrangements with entities other than Duck Creek's competitors, including suppliers or customers, that foreclose competition. Such agreements include, but are not limited to, certain exclusive dealing arrangements and tying arrangements in which the provision of a product or service is tied to a customer's agreement either to obtain another product or service or not to obtain a competitor's product or service. Employees must notify the General Counsel before negotiating or entering into any such agreements.

► **Gathering Information about Competitors**

Consistent with the Honestly Built pillar, Duck Creek prohibits any attempt to acquire a competitor's trade secrets or other proprietary information through unlawful means, such as theft, spying, bribery, or breach of a competitor's nondisclosure agreement. Employees may not accept any information that may have been obtained illegally by the party in possession, including competitive information received anonymously or marked as confidential. The Company's Legal department should be contacted immediately if an employee is unsure if the source of information is proper, as the improper gathering or use of competitive information could subject the employee and Duck Creek to criminal and civil liability.

Duck Creek and its employees may gather information about competitors from public sources such as published articles, advertisements, brochures, other non-proprietary materials, and surveys by consultants. Employees may gather information about competitors through conversations with customers as long as they do not procure such information through prohibited means, such as misrepresentation, theft, coercion, spying, or bribery. Conversations with customers also should not suggest an attempt to conspire with competitors, or gather information in breach of a customer's nondisclosure agreement with a competitor.

► **Insider Trading**

It is illegal and a violation of Company policy to purchase or sell securities of the Company or any other entity while you are in possession of material nonpublic information about the Company or that other entity obtained in the course of your position with the Company. This also applies to family members, such as spouses, minor children, adult family members who share the same household, and any other person or entity whose securities trading decisions are influenced or controlled by the officer, director or employee. To avoid even the appearance of impropriety, additional restrictions on trading Company securities apply to directors, officers and certain designated employees who have regular access to material nonpublic information about the Company. In addition to trading while in possession of material nonpublic information, it is also illegal and a violation of Company policy to provide such information to another ("tipping") who may trade or to advise another to trade on the basis of such information. This applies regardless of whether the person or entity who receives the information, the "tippee," is related to you and regardless of whether you receive any monetary benefit from the tippee.

For more information, please refer to the Company's Insider Trading Policy.

► **Anti-Money Laundering**

Duck Creek's policy is to conduct business in an honest and ethical manner and, at all times, in compliance with the laws of the countries in which it operates. Duck Creek has zero tolerance for fraud or financial crime, including money laundering and terrorist financing.

Duck Creek must comply with laws that prohibit money laundering and terrorist financing in all countries where it conducts business. This means Duck Creek is prohibited from (a) engaging in any money laundering and terrorist financing activities, and (b) assisting our clients or any other party (either intentionally or in some circumstances unintentionally) in violating these laws. Some of Duck Creek's affiliates must also comply with additional strict legal obligations under money laundering and terrorist financing laws.

► **Export Controls and Anti-Boycott**

Duck Creek's policy is to fully comply with the export control laws and regulations of the United States and the laws of the countries in which it operates. In connection with any export transaction, Duck Creek must comply with the destination, end user, and end use controls embodied in all applicable export control laws and regulations. Furthermore, Duck Creek is prohibited from participating or agreeing to participate in unsanctioned foreign boycotts and from engaging in certain financial and other transactions in contravention of applicable sanctions.

## **RESPONSIBILITY TO OUR PEOPLE**

### **▶ Respecting One Another**

Consistent with the pillar of People at the Core, Duck Creek employees must treat each other, and those they work with, with respect and should endeavor to deal honestly, ethically and fairly with the Company's suppliers, customers, competitors and employees. Duck Creek expects all employees, at all career levels, to live by the three pillars in all work-related situations and in everything they do that is connected with the activities and/or the reputation of Duck Creek. Every employee (as well as others that employees interact with in work-related situations) is entitled to be treated at all times with respect and professional courtesy, regardless of their seniority, role, or any other personal or professional characteristic.

Duck Creek expects employees to exercise good judgment, to behave professionally, and to treat both colleagues and people outside the organization (with whom they interact in work-related situations) with respect. Duck Creek's values go beyond what the law requires and it is expected that the Duck Creek workplace is free from any form of disrespectful behavior or harassment, whether it is prohibited by applicable or not.

### **▶ Equal Employment Opportunity**

The Company commits to a principle of providing equal opportunity for all, regardless of race, creed, color, religion, sex (including pregnancy), sexual orientation, national origin (including ancestry), age, disability, marital or partnership status, familial status, gender identity, military or veteran status, genetic disposition or any other characteristic as protected by any applicable federal, state, or local law. Applicants and employees are protected from discrimination in all employment decisions related to hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and any other aspects of employment. Please refer to the Company's Discrimination and Harassment Policy for additional information.

### **▶ Sexual Harassment**

Duck Creek does not tolerate any conduct that constitutes unlawful sexual harassment and will support anyone who is subjected to such harassment in the workplace, even if it is by client personnel. Please refer to the Company's Discrimination and Harassment Policy for additional information.

### **▶ Other Harassment**

Duck Creek does not tolerate verbal or physical conduct by any employee that harasses, disrupts or interferes with another's work performance or creates an intimidating, offensive, or hostile work environment. Harassment by any employee on the basis of race, creed, color, religion, sex (including pregnancy), sexual orientation, national origin (including ancestry), age, disability, marital or partnership status, familial status, gender identity, military or veteran status, genetic disposition or any other characteristic as protected by any applicable

federal, state, or local law is prohibited and is not tolerated. The Company will take appropriate measures in response to any incident that is reported. Please refer to the Company's Discrimination and Harassment Policy for additional information.

▶ **Workplace Violence**

Duck Creek has a zero tolerance policy for violence. Violence includes, but is not limited to, physically harming another, shoving, pushing, harassing, intimidating, coercing, brandishing Weapons, and threatening or talking of engaging in those activities.

It is the Company's intent to ensure that everyone associated with the business, including employees and customers, never feel threatened by any employee's actions or conduct. It is everyone's responsibility to prevent violence in the workplace. Employees can help by reporting any workplace incident that could indicate a co-worker is in trouble. Employees must report any incident that may involve a violation of the Code to a supervisor or the General Counsel. All reports made in good faith will be investigated and information will be kept confidential.

▶ **Weapon Free Work Place**

Weapons are prohibited on all Duck Creek owned, leased, or occupied property. In addition, unless permitted by any applicable state, provincial, federal, or national laws:

- ▶ Weapons are prohibited in parking lots at all Duck Creek owned, leased, or occupied property (unless locked in the vehicle); and
- ▶ Duck Creek employees or Duck Creek contractors must not possess, conceal, carry, or use a Weapon if they are conducting Duck Creek business at a non-Duck Creek location (this includes attending client events or client related hospitality, but excludes working from home).

State, provincial, federal, or national laws governing Weapons that are more stringent than the Code will take precedence where there is a conflict between the Code and the applicable law.

The Code shall not be construed to create any duty or obligation on the part of Duck Creek to take any actions beyond those required of an employer by existing law.

▶ **Drug Free Work Place**

Employees who use Prohibited Drugs may experience or cause a number of work-related problems such as accidents or injuries, excessive absenteeism and tardiness, lower productivity, missed deadlines and poor quality of work. Equally important, the use of Prohibited Drugs can cause a number of personal health and behavioral problems. Duck Creek emphasizes that drug abuse is dangerous in the workplace and is not condoned.

Employees must not possess, manufacture, use (or be under the influence of), supply, distribute, sell, or otherwise deal with a Prohibited Drug in any work-related situation. To do so constitutes a serious violation of the Code, as well as a potential criminal offense, that could lead (subject to applicable laws) to disciplinary action (up to, and including, termination of employment).

**IMPLEMENTATION OF THE CODE**

▶ **Responsibilities**

All Duck Creek employees are role models who have a specific obligation to visibly demonstrate Duck Creek's core values and pillars. Employees must actively promote respect in the workplace, and foster a positive working environment where people treat each other with respect. It is the duty of every Duck Creek employee to always take appropriate action if they witness (or become aware of) disrespectful behavior or harassment.

▶ **Dissemination, Education and Acknowledgement/Certification**

The Human Resources department shall periodically provide training or disseminate information to Duck Creek officers, directors and employees about the procedures, standards, and implementation of the Code. The Human Resources department shall take reasonable steps to communicate periodically and in a practical manner the standards and procedures set forth in the Code to Duck Creek's officers, directors and employees and, if appropriate, Duck Creek's independent contractors or agents. The Human Resources department will coordinate with other Duck Creek personnel or third party subject matter experts concerning the creation of, and dissemination of such training or communications appropriate to the respective roles and responsibilities of Duck Creek's employees.

As part of a Duck Creek's compliance program with respect to the Company's policies and the Code, directors, officers and employees will be required to sign the Acknowledgement/Certification provided on the last page of the Code.

The General Counsel shall be responsible for taking reasonable steps to provide information as necessary to the Board of Directors about developments related to the ethical, legal, and regulatory and compliance issues affecting Duck Creek.

▶ **Monitoring, Enforcement and Discipline**

The General Counsel, is responsible for:

- ▶ Auditing and monitoring compliance with the compliance program developed for the Code;
- ▶ Periodically evaluating the effectiveness of the compliance program developed for the Code and its implementation; and
- ▶ Assessing the effectiveness of Duck Creek's policies and procedures for detecting and deterring criminal conduct and behavior in breach of the Code.

Any employee who knowingly violates any law, or who knowingly violates any Duck Creek policy or procedure, will be subject to appropriate disciplinary action, up to and including termination. The Company may also report the conduct to the relevant government authorities, which may result in criminal prosecution or other sanctions.

Any employee who is aware of another employee's violation of such laws, policies, or procedures, and does not report that violation, will also be subject to appropriate disciplinary action, up to and including termination.

Any attempt to prevent, obstruct, or dissuade personnel in their efforts to report what is believed in good faith to be a violation of the Code is prohibited and cause for disciplinary action, including termination.

▶ **Raising Concern of a Potential Violation; Reporting Illegal or Unethical Behavior**

Employees who raise concerns help Duck Creek maintain a respectful workplace and high performance business. It is the responsibility of every Duck Creek employee to speak up when a potential violation of the Code occurs.

Duck Creek requires its employees, officers, directors and third parties to report any known or suspected criminal activity involving Duck Creek or its employees, officers, or directors. If anyone becomes aware of any suspicious activity or behavior, including but not limited to, concerns regarding questionable accounting or auditing matters, potential corruption, or fraud, it must be promptly reported. Information about known or suspected violations of any applicable laws, rules or regulations or Company policies, including the Code, other than concerns regarding accounting, internal accounting controls or auditing matters (which are overseen by the Audit Committee in accordance with the Company's Whistleblower Policy), on the part of any director, officer, employee or other third party such as an independent agent, adjuster, appraiser, supplier, or vendor must be reported immediately to the General Counsel. If the General Counsel is the subject of such report, you may report the violation to the General Counsel or the Board of Directors or any applicable committee thereof. You should contact the General Counsel for clarification or interpretation of any of the policies or provisions of the Code.

Employees are expected to demonstrate reasonable grounds for concern and encouraged to provide sufficient information to permit a thorough investigation of their concerns. Reports of a violation, or possible violation, may be made by telephone, email, in person or in writing. A sufficiently detailed description of the factual basis for the allegations should be given in order to allow for an appropriate investigation. Contact information for reporting violations, or possible violations, is:

**CONFIDENTIAL**

Duck Creek Technologies, Inc.  
22 Boston Wharf Road, Floor 10  
Boston, MA 02210  
Attention: General Counsel

Reports of a violation, or possible violation, may also be made through the Duck Creek Employee Hotline, a phone and web-based reporting system that is managed by NAVEX Global, a third party company. This system allows you to communicate your concerns and enables you to remain anonymous if you so choose. It is accessible to all employees, regardless of location or position. NAVEX Global will manage the reporting system for us, and all reports entered in the system are completely confidential.

You may submit a report by visiting [duckcreek.ethicspoint.com](http://duckcreek.ethicspoint.com) and selecting "Make a Report" or by calling the telephone number for your location listed on the left-hand menu. To learn more about how to make a report and how to access frequently asked questions (FAQ), please review the short [training video](#) on the NAVEX training page.

**Complaints Made in Bad Faith**

A "bad faith" complaint means a complaint that is brought with a deliberate intention to deceive Duck Creek about the facts or circumstances complained of, or to cause harm to the individual complained about.

A "bad faith" complaint can have very serious consequences for a person complained against, and employees are entitled to protection from complaints made in bad faith. Where Duck Creek is satisfied, following an appropriate investigation, that any complaint of violation of the Code has been made in bad faith, then the complainant will be subject to disciplinary action, up to and including, termination of employment.

► **Anti-Retaliation**

Duck Creek prohibits and does not tolerate Retaliation of any kind, including, but not limited to, Retaliation against any employee who: (1) comes forward to raise, in good faith, a concern about a violation of any law, a violation of the Code or any other Duck Creek policy; or (2) assists Duck Creek or a law enforcement authority, by providing information to address a concern. Duck Creek management and leadership has a specific obligation to ensure that there is no Retaliation against employees. Retaliation may lead to disciplinary action being taken, up to and including, termination of employment of the individual who is retaliating.

► **Investigations**

All directors, officers and employees are required to cooperate with the General Counsel or his or her designees regarding any investigation into a potential violation of any applicable laws, rules or regulations or Company policies, including the Code. Based on the characteristics of the possible violation, other representatives involved in the investigation may include the Company's internal audit function or an independent third party. Following the investigation, if necessary, the investigation team may recommend corrective actions to the appropriate managers for implementation.

The identity of the individual reporting possible violations will be kept confidential, to the fullest extent practicable, consistent with enforcing the Code and in accordance with the Company's legal rights and obligations under applicable law. At that time, the information will only be released on a need-to-know basis, consistent with applicable law. Requests for information by law enforcement officials should be immediately referred to the General Counsel.

► **Waivers and Revisions**

Waivers of or exceptions to the Code will be granted only in rare circumstances. Any waiver of the Code for a director or officer, or any amendment of the Code, may only be made by the Company's Board of Directors or the appropriate committee of the Board and will be promptly disclosed in accordance with applicable laws, rules and regulations. All related personal transactions must be approved by the Audit Committee in accordance with the Company's Policy and Procedures with Respect to Related Person Transactions. Waivers for all other employees will be considered by the General Counsel.

► **Local Laws/Regulations**

Certain countries may provide further requirements, guidelines, or information to Duck Creek policies and procedures. All Duck Creek policies are subject to local laws where the Company operates.

<b>ADMINISTRATOR:</b>	General Counsel
<b>LAST REVIEW DATE:</b>	August 7, 2020
<b>EFFECTIVE DATE:</b>	August 7, 2020
<b>FREQUENCY OF REVIEW:</b>	Annually

## CERTIFICATION

I acknowledge that I have reviewed the Duck Creek Technologies, Inc. ("Duck Creek" or the "Company") Code of Ethics and Business Conduct (the "Code"). I understand that I am responsible for knowing and adhering to the principles and standards of the Code and the policies referenced therein.

I further acknowledge and agree that the Code is intended to provide a general overview of the Company's policies, and does not necessarily represent all such policies and practices in effect at any particular time.

I certify that I have carefully read and I understand the Code and the policies it references. I support these professional standards for Duck Creek, and for myself, and I will act in accordance with them.

I understand that I should contact any of the resources listed in the Code if I have any questions concerning this document or any behavior or situation concerning Duck Creek. I also understand that I have a responsibility to immediately report any violations or suspected violations of the Code to one of the resources listed in the Code.

I understand that the Code is not, in any way, a contract of employment or a guarantee of any continued relationship with the Company.

Finally, I understand that failure to follow the Code may result in disciplinary action, up to and including termination of employment. By signing below, I pledge to abide by the policies outlined in the Code and the agreements set forth in the Code of all covered individuals.

**Signature**

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**Name (please print)**

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**Date**

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**EACH EMPLOYEE, OFFICER AND DIRECTOR OF THE COMPANY IS REQUIRED TO SIGN, DATE AND RETURN THIS CERTIFICATION TO THE COMPANY'S GENERAL COUNSEL PROMPTLY. FAILURE TO DO SO MAY RESULT IN DISCIPLINARY ACTION.**