

SOCIAL MEDIA GUIDELINES OF LUXOFT HOLDING, INC

*Effective: February 15, 2015
Last Revision: December 10, 2021*

OVERVIEW

Social media continues to evolve and change the way we work and communicate internally and externally. While social media creates new opportunities for communication and interaction, it also creates new responsibilities for you and risks for both you and the Company.

When we use the term social media, we mean any digital technology or practice that enables people to use, create and share content, opinions, and insights in conversations over the internet. This includes many of the platforms traditionally identified as social media such as Facebook, Twitter, LinkedIn, Wikipedia, Whisper, and Tumblr. However, it also includes other communication channels such as Youtube, Flickr, Vine, Vimeo, Instagram, Glassdoor, theLayoff.com, blogs, wikis and comments included on websites reviewing products, services, or solutions.

The Company participates in social media only through officially authorized corporate channels. Only personnel specifically authorized by the Company's Marketing and Communications Department, may speak on behalf of the Company on these channels.

These guidelines apply both to social media use on authorized corporate channels and to any personal use of social media when your communications relate to Luxoft Holding, Inc or one of its subsidiary companies (the "**Company**" or "**Luxoft**").

The Company encourages all personnel to participate in social media to whatever extent they feel comfortable. Social media can be faster, easier, and cheaper than traditional forms of media and communication. However, social media conduct when your communications relate to the Company should not be any different from your regular, everyday conduct as a member of the Company's personnel, using sound judgment, common sense and by following the Code of Conduct of DXC Technology ("**DXC**"), the parent entity of the Company (the "**Code of Conduct**" or "**Code**").

These guidelines are written in a less formal, more conversational tone than some of our other policies and guidelines but that does not make them any less important. Failure to follow these guidelines when using social media could have serious consequences for the Company and you, up to termination in accordance with applicable law, the Code, and any internal labor regulations. So please, always keep these guidelines and common sense in mind when using social media.

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APPLICABILITY/SCOPE

To the extent permitted by applicable law, these guidelines apply worldwide to all directors, officers, executives, employees, and representatives of the Company, its wholly-owned subsidiaries, and their affiliates.

GENERAL GUIDELINES THAT APPLY TO ALL SOCIAL MEDIA USE

Know and Follow the Code of Conduct

These guidelines are based on the foundation of the Code of Conduct. All personnel members of the Company worldwide are subject to the Code, and all social media activities that relate to the Company are also governed by the Code.

In addition, other policies of the Company work together with the Code and these social media guidelines and you should be familiar with all of them and keep them in mind when using social media. These other policies include the DXC Insider Trading Policy, IT Security policies, and the Data Protection Policy.

Be Honest and Transparent

When discussing any topics relevant to the Company be clear who you are and include your affiliation with the Company. Never use fake aliases or create fake posts to positively or negatively mislead readers. Quickly correct mistakes and be open about previous posts that have been altered.

Be Respectful

The Company is a global organization, and your posts may reach a diverse group of people, including employees, security holders, clients, suppliers, and members of the general public. Readers of your social media communications may have differing customs, values, and interpretations of your words. Always be fair and courteous. Never post or forward statements, audio, video, pictures, or other materials that could be considered offensive, malicious, obscene, harassing, or threatening to any readers or viewers, including fellow employees, clients, and suppliers.

For example, never post anything meant to harm someone's personal or professional reputation or jokes based on race, sex, religion, age, or disability.

Protect Confidential Information or Trade Secrets

Be thoughtful about what you post and how it might affect trade secrets and proprietary, confidential information of the Company, its clients, suppliers, partners, or employees/contractors. Trade secrets may include information regarding the development of systems, processes, products, know-how

and technology. Do not post internal reports, policies, procedures, or other internal business-related confidential communications.

Keep in mind that you should always check contractual obligations regarding confidentiality. Also, do not identify a client, supplier, partner, or employee/contractor by name, or use their logo, without their specific permission. Never share confidential information about a client project/engagement. Identifying a customer and/or project/engagement in social media may be a breach of contract. Identifying a person without his/her consent may be a breach of privacy and data protection law.

Do Not Disclose Non-public Information

As the Company is a group of subsidiaries that is part of DXC, a public company with stock traded on the New York Stock Exchange, the Company is subject to strict securities and disclosure laws and regulations on how, when and what information about the Company may be communicated to the public. Inadvertent violations of these regulations can lead to serious consequences for the Company and for you. Never disclose non-public information. Non-public information means the information that has not yet been widely disseminated publicly or it has, but the public has not yet had time to absorb that information.

Because it can be difficult to determine what might constitute non-public information, you should avoid discussing any of the following topics (including just giving your opinion):

- business performance and prospects of the Company;
- the Company earnings;
- business plans of the Company;
- corporate transactions of the Company, including:
 - ✓ merger and acquisition activity;
 - ✓ securities offerings or other financings; and
 - ✓ stock buybacks;
- potential or existing litigation and other legal matters unrelated to terms and conditions of your or your coworkers' employment;
- internal or government investigations unrelated to terms and conditions of your or your coworkers' employment.

Please take special note of the Quiet Period rule: during DXC financial window period, to and until a contract is executed, there shall be no communication, interaction or engagement by the Company employees or its representatives across all channels including review sites and social networks: LinkedIn, Twitter, Facebook, Zing, VK, etc.

Respect Privacy, Copyright and Trademark Laws

To avoid violations of privacy, copyright, and trademark laws, do not post audio, video, pictures, or other content without the consent of those owning the media. When quoting copyrighted work, be sure to credit the original source and, if appropriate, add a link.

Safeguard Confidential or Proprietary Data and Intellectual Property (IP)

Company's IP provides us with our competitive advantage and defines who we are; be sure to keep it within Luxoft. Confidential or proprietary data includes, but is not limited to, client lists, pricing sheets, strategic plans, and financial data. IP includes copyright, trademark, service marks, patents, and trade secrets. Do not share confidential, proprietary data or IP of Luxoft clients, partners, suppliers, or employees/contractors without appropriate permission. Keep in mind that a client (or other type of contract stakeholder) can require Luxoft to keep many different types of information confidential.

Protect Clients and Suppliers

Do not refer to our clients or suppliers by name or reveal any terms of their agreements with the Company or any other confidential information related to them without advance permission. Also, do not discuss or conduct business with clients or suppliers in an online forum. Only Luxoft's official respondents may communicate with the client's contract and procurement administrator or the designee solely regarding administrative questions relating to the procurement process.

When engaging in social media at a client site, and especially if using a client e-mail address, profile and/or client system, always consult the Client's Social Media Policy first to understand what is and is not allowed.

Think Before Posting

Once something is posted on the internet, it can be impossible to completely delete. So think very carefully before posting anything that might be inconsistent with these guidelines.

Media Contacts

You should not speak to the media on the Company's behalf without contacting the Company's Marketing and Communications Department. All media inquiries should be directed to this Department.

Respect and comply with the terms of the social media sites you visit

Review the terms of use of all social media sites you visit and ensure your use complies with them. Pay particular attention to terms relating to:

- prohibitions or restrictions on the use of the site, such as those relating to advertising, marketing and promotions or other commercial purposes; for example, Facebook's Statement of Rights and Responsibilities (its terms of use) prohibits businesses from administering promotions through Facebook without Facebook's prior written consent;
- ownership of intellectual property used on the site, or information collected or generated through the use of it (for example, any of the Company's copyright material and trademarks that might be posted on the site, or customer information that the site owner collects through the site);
- requirements for licenses allowing the site owner and other third parties to use the company's trademarks or other intellectual property; and
- rights and responsibilities of the site owner and users relating to privacy.

Conduct Not Prohibited by These Guidelines

These guidelines are not intended to preclude or dissuade personnel from engaging in legally protected activities/activities protected by state or federal law in the United States, including the National Labor Relations Act, or laws of the country where you work, such as discussing wages, benefits or terms and conditions of employment, forming, joining or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their and their fellow employees' mutual aid or protection or from engaging in legally required activities.

For More Information

If you have questions or need further guidance, please contact the Company's Marketing and Communications Department.

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ADDITIONAL GUIDELINES THAT APPLY TO YOUR PERSONAL SOCIAL MEDIA USE

The guidelines in this section are in addition to the "General Guidelines That Apply to All Social Media Use" and, together, they apply to any personal social media communications you make in your personal social media use when those communications relate to the Company.

Use a Disclaimer

Only those specifically authorized to do so, may speak on behalf of the Company through social media channels. If you are not authorized to speak on behalf of the Company but make any communication on your social media relating to the Company, make it prominently clear in your profile or posts that your statements and opinions are your own personal views and that you are not speaking on behalf of the Company. Here is an example of a disclaimer:

"I am an employee of Luxoft, a DXC Technology Company (NYSE: DXC). My statements and opinions on this site are my own and do not necessarily represent those of Luxoft."

But remember, simply including the disclaimer does not relax or eliminate your need to comply with these guidelines.

Be Mindful of the Lines Between Personal and Professional Life

Referring to the Company in your personal social media communications blurs the lines between your personal life and your workplace responsibilities. You are identifying yourself as the Company's personnel, so be sure that other content associated with you is both consistent with the professional image the Company expects you to portray to your colleagues and managers, and to the Company's clients and suppliers, and is consistent with these guidelines. Statements, pictures, or other media originally intended for your friends and family may be forwarded and may be seen by your colleagues, managers, and our clients and suppliers.

Don't Respond to Negativity

Social media channels may often include negative posts about the Company. If you are not specifically authorized to do so, these matters are better handled by those trained and authorized to speak on the official Company's social media channels. Please pass any negative posts that you feel require further attention to the Sergey Karas, Head of Global Marketing, at SKaras@dxc.com, with a copy to Natasha Ziabkina, General Counsel at NZiabkina@dxc.com.

Pass Along Compliments and Criticism

The Company recognizes the large volume of information posted about us every day on social media channels. If you see significant positive or negative statements about the Company that might

deserve further attention, consider passing them along to Sergey Karas, Head of Global Marketing, at SKaras@dxc.com, with a copy to Natasha Ziabkina, General Counsel at NZiabkina@dxc.com.

Do Not Use the Company or Client E-mail Address

Unless you are authorized to and are speaking on behalf of the Company or the client, do not use your Company or client e-mail address when registering or posting on personal social media networks, use a personal e-mail address.

Personal Social Media at Work

Be sure that your social media activities do not interfere with your responsibilities to the Company and our clients and suppliers. Refrain from using social media in a personal capacity while working on the Company-provided equipment.

Special Considerations for Management and Executives

Even with an appropriate disclaimer, management and executives of the Company should keep in mind that their statements can still be construed by the Company's personnel and the public as speaking for the Company due to the nature of their position. Accordingly, management and executives should use extra care when using social media.

Updating Employment Status

There are several sites such as LinkedIn which are more targeted towards your profession. On such sites, you are permitted to update your professional status only with company name and role/job title, no more.

You should remove or amend any reference to current employment status with Luxoft within 48 hours of your official termination date. Such reference should be deleted or amended to detail that you are no longer an employee of Luxoft from all social media sites. As of your termination date you are not to hold yourself out as being an employee of Luxoft in any capacity and by any means whatsoever.

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ADDITIONAL GUIDELINES THAT APPLY TO SOCIAL MEDIA USE ON BEHALF OF THE COMPANY

The guidelines in this section are in addition to the "General Guidelines That Apply to All Social Media Use" and, together, they apply to any social media communications you make when speaking on behalf of the Company.

Be Clear About the Company Sponsorship

In addition to being clear on who you are and describing your position or affiliation with the Company, be clear that your statements are made on behalf of the Company. For example, include on the relevant social media channel a statement that it is "sponsored by the Company" or consistently include the Company logo. It is important that readers and viewers be able to distinguish between personal and corporate communications.

Add Value

Your communications should typically reflect your area of expertise. Speak the most about what you know best. Write in the first person and, to the extent you feel comfortable, share some information about yourself that others would find interesting in order to increase the appeal of your postings.

Consider the value of your contribution before you post. Examples of adding value include:

- Assisting others in the community, including peers and clients;
- Solving a problem;
- Improving knowledge or skills;
- Enhancing the sense of community surrounding the Company;
- Improving the image of the Company and our products.

Be Accurate

Make sure what you post is factually accurate.

If you see or learn of misrepresentations about the Company, you may point out the misrepresentation but stick to accurate facts and avoid unproductive arguments. When posting about competitors generally, also stick to facts and always avoid disparaging comments that could negatively affect your or the Company's credibility.

Include Full Context

If you are specifically authorized to post non-public information through the Company-sponsored social media channels, it is important to include the full context of what you are writing about to avoid being materially misleading under securities and disclosure laws. This includes portraying a balanced discussion, not simply highlights.

Where space is limited, for example due to Twitter's character limit, includes links to full context posts or discussions on the Company's website or other social media channels containing a full, balanced discussion of the subject matter. Link-shorteners (so called URL-shorteners) can be useful in case of character limits.

Be Very Careful About Linking to Third-party Information

As part of a public company, securities and disclosure laws may hold the Company responsible for information we link to on our website or social media channels as if we had made those statements ourselves. This can include "retweeting" on Twitter and "liking" on Facebook. Never link to, retweet or like posts or information from non-Company sources unless you are completely comfortable making those statements yourself on the Company-sponsored social media channels (keeping in mind these guidelines). If you do link, retweet or like, it is helpful to include an explanation about the source and why you are linking to, retweeting, or liking the statements.

Keeping Records

Remember that social media communications can be held to the same legal standards as more traditional media communications. The Company may be required to preserve information that is relevant to possible claims or investigations. The Company will preserve all communications on the Company-sponsored social media channels.

Ownership of Social Media Accounts

All social media accounts created and used by the Company's personnel on behalf of the Company belong solely to the Company. This includes all log-in information, passwords and content associated with each account, including followers and contacts. All social media accounts using the Luxoft logo and brand must be approved by the Marketing and Communications Department.
