



Code of Conduct and Ethics

Endava PLC | August 2025

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1 INTRODUCTION

This Code is designed to ensure we:

- operate our business ethically and with the highest level of integrity
- avoid actual or apparent conflicts of interest
- comply with the letter and spirit of all applicable laws and Endava policies, including full, fair, accurate, timely and understandable disclosure in reports and documents we file with the U.S. Securities and Exchange Commission (the “SEC”) and in our other public communications
- protect company assets, including corporate opportunities and confidential information
- promote fair dealing practices
- promptly internally report suspected violations of this Code.

We count on all Endavans to uphold these principles as part of who we are. By doing so, we build a culture of trust and integrity. If principles are not upheld, we will take appropriate steps to address concerns, including corrective action where necessary.

DEFINITIONS

- **Conflict of Interest:** A situation where personal interest could improperly influence professional judgment.
- **Inside Information:** Non-public information that could influence an investor's decision to buy or sell securities.
- **Improper Personal Benefit:** Any gain, financial or otherwise, received due to one's position at Endava.

2 POLICY SCOPE

This Code applies to all executives, directors, officers, managers, and other employees (staff, contract, and temporary) of Endava and its subsidiaries, and extends to all our majority-owned businesses and dealings and transactions in all countries in which Endava operates (collectively, “Relevant Persons”). In addition, we expect our agents, consultants, representatives, lobbyists, suppliers/vendors, resellers, distributors, customs or other brokers, contractors, advisors, and other business partners (collectively, “Intermediaries”) to comply with the principles contained in this Code.

3 HONEST AND ETHICAL CONDUCT

Consistent with our values, Endava staff must deal ethically, honestly and fairly with Endava's partners, clients, contractors, suppliers, competitors, fellow employees, or anyone else with

whom we have contact in the course of performing our jobs. Staff should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

4 COMPLIANCE

Endava strives to comply with all applicable laws and regulations. It is your personal responsibility to adhere to the standards and restrictions imposed by those laws and regulations, including those relating to financial and accounting matters. The same applies to policies we adopt, such as this one. Even if conduct complies with the letter of the law or our policies, we must avoid conduct that will have an adverse impact on the trust and confidence of our clients, partners or investors.

4.1 ANTI-BRIBERY AND ANTI-CORRUPTION

Bribery is a form of corruption involving the giving or receiving by any person of anything of value (usually money, a gift, loan, reward, favour, or other consideration) either directly or indirectly, as an inducement or to gain an undue advantage or influence.

We have a zero-tolerance policy when it comes to bribery and corruption. This means you are strictly prohibited from directly or indirectly promising, offering, or authorizing the provision of a financial or other advantage to any person in order to induce that person to perform their function or activities improperly, or to achieve any improper purpose related to Endava's business. It does not matter whether the other person is a UK, US, or foreign public official, political candidate, party official, private individual, private or public sector employee or any other person. You may not even create the appearance of an effort to improperly influence another person.

For further information, including more detail in relation to gifts and hospitality, political and charitable donations, sponsorship, and facilitation payments, please refer to our Anti-Bribery & Anti-Corruption Policy.

4.2 CONFLICTS OF INTEREST

A conflict of interest may exist where the interests or benefits of one person or entity conflict or appear to conflict with the interests or benefits of Endava. Your decisions and actions should be based on the best interests of Endava and not based on personal relationships or benefits, either for yourself or for others. Employees must never use or attempt to use their position with Endava to obtain improper personal benefits.

You must promptly notify the Company of any actual conflicts of interest, as well as any potential or perceived conflicts of interest. Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. We encourage you to seek guidance from the Integrity team if you have any questions or doubts. You can also report a concern about a potential conflict of interest by using our [Speak Up Safely](#) service.

In the interest of clarifying the definition of "conflict of interest," if any member of the board of directors of Endava (the "Board") who is also a partner or employee of an entity that is a holder of Endava equity, or an employee of an entity that manages such an entity (each, a "Fund"), acquires knowledge of a potential transaction (investment transaction or otherwise) or other matter other than in connection with such individual's service as a member of the Board (including, if applicable, in such individual's capacity as a partner or employee of the Fund or the manager or general partner of a Fund) that may be an opportunity of interest for both Endava and such Fund, then, provided that such director has acted reasonably and in good faith with respect to the best interests of Endava, such an event shall be deemed not to be a "conflict of interest" under this Code.

We will abide by the securities laws that govern conflicts of interest by our executive officers and directors. As a result, the actions or relationships that will be considered conflicts with respect to our executive officers and directors are only those that meet the requirement for disclosure in our periodic filings with the SEC pursuant to Item 404 of Regulation S-K or Item 7.B of Form 20-F, as applicable, which are referred to as related party transactions. Such related party transactions must be approved by the Audit Committee of the Board as required by applicable laws and regulations, and provided such approval is obtained in advance and such transactions are publicly disclosed, such approval shall not be deemed a waiver of this Code.

Please refer to our Conflicts of Interest Policy and our [Speak Up Safely Policy](#) for further information.

4.3 INSIDE INFORMATION

Trading in shares or securities is regulated by law in the jurisdictions where we operate. Trading in shares or securities based on inside information or material non-public information, or providing such information to others who might trade, is illegal and is strictly prohibited.

You must not buy or sell shares or other securities of Endava, or any other company based on inside information or material non-public information – that is, information which is not publicly available and which an investor would consider important when deciding whether to buy, sell or hold shares or other securities (an activity known as “insider trading”). You also must not disclose inside or material non-public information to anyone else unless you are authorised to do so. Consequences may include civil and criminal penalties. This restriction applies even to family and friends. Violations may result in termination and criminal prosecution.

Our Share Dealing Code sets out the rules, regulations, and insider trading laws that everyone must comply with. For further guidance, please contact the Endava Company Secretariat team by emailing endava.co.sec@endava.com.

5 PROTECTION AND PROPER USE OF COMPANY ASSETS

Cybersecurity and the protection of our IT infrastructure, systems and equipment is vital to our success as a digital company. For this reason, security features are enforced, unauthorised software is not allowed on Company computers, and we do not connect non-approved hardware to our network. All employees are responsible for protecting Company assets, avoiding theft, damage and waste. Company assets must not be used for private purposes, only for legitimate business purposes. Use of non-authorized software or hardware will be considered a breach of this Code.

The obligation to protect Company assets includes Endava’s proprietary information, including intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business and marketing plans, ideas, designs, databases, records and any non-public financial data or reports. Unauthorised use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

6 CONFIDENTIALITY

We all share responsibility for maintaining the confidentiality of information entrusted to us by Endava or by our clients, suppliers, and business partners, except when disclosure is expressly authorised or is required or permitted by law.

Confidential information includes all material non-public information that might be of use to Endava's competitors or harmful to Endava or its clients, suppliers or partners if disclosed. You must never discuss or disclose information to colleagues (or people claiming to be colleagues) unless there is a business need to do so. Further information is included in our Information Security Policy. This obligation continues even after employment ends.

7 ACCURATE FINANCIAL AND ACCOUNTING DISCLOSURES

Accurate record-keeping and reporting of financial and non-financial information reflect on our corporate reputation and are an important part of our legal and regulatory obligations.

Our principal executive officer, principal financial officer and people who perform similar functions are our "senior financial officers" and are responsible for ensuring that disclosures in our financial statements, periodic reports, other documents filed with the SEC and other public communications are full, fair, accurate, timely and understandable.

8 SUSTAINABILITY & ESG

As our organisation continues to evolve, we remain committed to creating a positive impact in support of our people, customers, communities and all our stakeholders.

We enable our people to be the best they can be by creating learning and development opportunities, fostering an inclusive work environment and making sure everyone is connected to our culture. Our Inclusion and Belonging policy reflects our commitment to identifying and eliminating unfair biases, stereotypes or barriers that may limit people's full participation at work and their access to the opportunity to succeed.

We respect human rights and have a zero- tolerance policy towards slavery and human

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trafficking. We provide our people with fair wages and benefits, to promote a respectable standard of living, and encourage them to have good work-life balance. We uphold our people's freedom to join any association or union, providing it does not contravene local law, as well as their right to collective bargaining, where applicable. We also have a commitment to keeping the highest standards of Health and Safety.

We are a leading provider of next-generation technology services, dedicated to enabling our clients to drive real impact and meaningful change. We foster innovation and a customer-centric approach, while also striving to safeguard customer privacy and security by aligning with best practice industry standards.

We continuously raise Endavans' awareness on the importance of operating responsibly and we expect all our people to behave ethically, honestly and fairly. We also strive to drive sustainability through our supply chain.

We care about our impact on the world and follow sound environmental practices to reduce our environmental footprint. Implementing Science Based Targets initiatives (SBTi) – approved emissions reduction goals is a key priority in our climate agenda and reflects our ambition to contribute meaningfully to global decarbonisation efforts.

For further information, please refer to our We Care Policy which sets out Endava's approach to sustainability and ESG.

9 BREACH OF POLICY

This Code is a statement of certain fundamental principles, policies and procedures that govern Endava staff in the conduct of our business. Reported violations of this Code will be investigated and appropriate action taken. We are committed to upholding our company values in all aspects of our work. We are committed to helping every Endavan live our values. If concerns arise, we will first work to understand the situation and provide guidance and support. In rare cases of serious or repeated breaches, disciplinary action, including legal or regulatory escalation, may be required.

10 Reporting

Our Code of Conduct cannot cover every situation we may face at work. If you find yourself in a situation where you are being asked to do something you think is wrong, or suspect a colleague, customer or supplier is doing something unethical or illegal, we encourage you to speak up and report your concern. We know it takes courage to speak up. Our Speak Up Safely Policy provides a procedure for reporting serious concerns that are contrary to Endava's purpose and values. This relates to any form of improper conduct that includes a breach of this Code; that indicates a possible violation of our accounting or auditing rules; that suggests bullying, harassment or victimization of an individual at work or a violation of any of our ethical standards.

Individuals can speak in confidence to (i) their line manager (ii) to a senior manager or (iii) to a Speak Up regional representative. Speak Up Safely reps provide impartial guidance on the options and process open to individuals thinking of raising a concern; they can similarly support anyone named in a report. Depending on the seriousness of the issue and who is suspected of the malpractice (for example if it is suspected that local management is involved), individuals can approach Endava's Chief Integrity Officer directly at integrity.officer@endava.com.

Alternative ways to report a concern:

- Employees can email speakupsafely@endava.com
- Submit a report electronically using our Speak up Safely service
 - Visit <https://portal.speeki.com>

We expect our employees to do their best to comply with this Code. It is important that you stay vigilant to ensure there are no violations of this Code by anyone. Do not stay silent in the face of a potential violation. If you have knowledge of a violation and fail to report it, you too may be subject to disciplinary action under this Code. Please refer to our Speak Up Safely Policy for full guidance and information on when and how to report any concerns you have.

11 NO RETALIATION

We celebrate those who raise concerns as champions of our values, helping us build a culture

of openness and trust. Endava will not retaliate against any individual participating in the investigation of any such complaint either. Finally, Endava will not permit any such retaliation by any manager or executive officer, or by any company with which we contract. If you believe you have been subjected to retaliation or the threat of retaliation, please contact the Chief Integrity Officer.

12 DIGITAL CONDUCT AND SOCIAL MEDIA USE

Employees are expected to behave professionally on digital platforms, including internal tools and public social media. Sharing confidential company information or making disparaging comments about Endava or its stakeholders online is prohibited.

13 USE OF ARTIFICIAL INTELLIGENCE AND AUTOMATED SYSTEMS

Endava is committed to the ethical and responsible development, deployment, and use of Artificial Intelligence (AI), machine learning, and automated systems.

Employees and third parties working on or with such systems must:

- Ensure that AI applications align with Endava's values, including fairness, accountability, and transparency.
- Take proactive steps to prevent bias, discrimination, and unintended harm in the design and use of AI.
- Clearly communicate when automated systems are used in ways that impact individuals or business decisions.
- Maintain appropriate human oversight of AI systems, especially in high-impact areas.
- Safeguard data privacy and security in all AI-related activities.
- Comply with all applicable laws, regulations, and internal standards related to AI and emerging technologies.

Endava reserves the right to audit AI-enabled systems for compliance with ethical and regulatory standards. We are committed to supporting teams as they navigate the responsible use of AI. If challenges arise, we will provide guidance and training to ensure alignment. Serious breaches may still require formal action.

14 DATA PRIVACY

We are committed to protecting the personal data of our employees, clients, partners, and all individuals whose information we handle. We collect and process personal data responsibly, lawfully, and transparently, in line with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) where it applies. Our teams are expected to uphold these standards at all times, ensuring data is accessed only when necessary, used appropriately, and safeguarded against unauthorized disclosure or loss. Respecting privacy is not just a legal obligation – it is integral to building and maintaining the trust placed in us by our clients, partners and employees

15 GOVERNANCE & OVERSIGHT

The People Team is responsible for reviewing and updating this Policy annually, recommending final approval of the Policy – including significant revisions – to the Controls and Policy Committee, followed by the Endava Board.

16 WAIVERS OF THIS CODE

Any amendment or waiver of any provision of this Code must be approved in writing by the Board or, if appropriate, its delegate(s) and promptly disclosed when required pursuant to applicable laws and regulations. Any waiver or modification of this Code for a director, executive officer or senior financial officer will be promptly disclosed to shareholders if and as required by applicable law or the rules of any stock exchange on which any of Endava's equity securities are listed.

17 AMENDMENTS

This Code sets out Endava's general approach to the matters it covers and is non-contractual, which Endava may, at its discretion, vary or amend from time to time.

investigation of any such complaint either. Finally, Endava will not permit any such retaliation by any manager or executive officer, or by any company with which we contract. If you believe you have been subjected to retaliation or the threat of retaliation, please contact the Chief Integrity Officer.

18 POLICY REVISION

| Revision | Date of revision | Description of update | Approved By |
|----------|------------------|---|-----------------------------|
| 1.0 | 28.06.2018 | Initial version | Board |
| 2.0 | 25.03.2019 | Annual review | Controls & Policy Committee |
| 3.0 | 02.05.2019 | Annual review | Board |
| 4.0 | 11.05.2020 | Annual review | Controls & Policy Committee |
| 5.0 | 19.05.2020 | Annual review | Board |
| 6.0 | 21.04.2021 | Annual review | Controls & Policy Committee |
| 7.0 | 06.09.2021 | Alignment with the Integrity initiative, introducing the role of Chief Integrity Officer. | Controls & Policy Committee |
| 8.0 | 02.08.2022 | Annual review | Controls & Policy Committee |
| 9.0 | 24.08.2023 | Annual Review | Controls & Policy Committee |
| 10.0 | 30.08.2023 | Annual Review | Board |
| 11.0 | 15.08.2024 | Annual Review | Controls & Policy Committee |
| 12.0 | 22.08.2025 | Annual Review | Controls & Policy Committee |
| 12.0 | 28.08.2025 | Annual Review | Board |