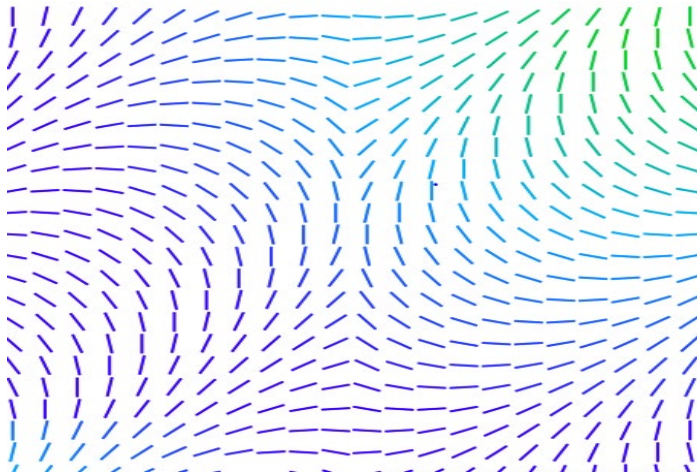


# Trellix

## Code of Conduct



### Welcome

Here at Trellix, we are committed to conducting business with the highest degree of honesty and integrity wherever we operate. Just as we dedicate ourselves to keeping the world safe from cyber threats, we also pledge to do so in an ethical manner. While we strive to cultivate a working environment that promotes individual and company success, we apply the highest ethical standards to all our interactions with colleagues, customers, and business partners across the globe.

This Code of Conduct is a tool to help guide us as we work to accomplish our goals together, while holding ourselves responsible and accountable for our actions. **YOU** are a critical part to our success and each of you have an obligation read this Code, understand it, and follow it every day, without exception. This Code will also help ensure that everyone who works at or does business with Trellix, feels confident about our high ethical standards, honesty, and integrity.

Thank you in advance for your ongoing commitment to our values and the culture of integrity that is critical to our continued success!

Trellix

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### Welcome to Trellix

This Code of Conduct (the “Code”) is our “north star” guide to help us make appropriate business decisions that will enable our business to thrive and safeguard our reputation in the marketplace.

This Code reflects our culture to:

- **Be open and act with integrity and ethically in all our business dealings;**
- **Treat all people with fairness and respect;**
- **Offer a place to work where there is equal opportunity for everyone to succeed and have fun;**
- **Enable people to be tenacious and their authentic self;**
- **Foster and celebrate diversity;**
- **Spark curiosity, innovation, and creativity; and**
- **Speak up when we have concerns.**

While this Code addresses numerous topics, it is not intended to be comprehensive or address every subject or issue that may arise in each country where we do business. When local country laws have alternative requirements, we will follow the local laws; however, we will follow this Code over conflicting local business practices. Other company policies that are referenced in this Code can be found at the [Trellix Policy Portal](#).

All Trellix employees are responsible to review this Code and complete the Code certification on an annual basis. Newly hired employees must review and sign the Code certification as part of their onramp process. The Code serves as your guide for conducting business with integrity; but it is not an employment contract and confers no rights relating to employment.

The Code also applies to non-employee corporate officers and directors.

Since we live in a dynamic world, we may be required to periodically update this Code to address changes to laws or the business landscape. We also value your feedback about this Code and how we can continue to evolve it to best reflect our culture and values.

If you ever have questions about the Code, or concerns about possible ethical violations in the workplace, don’t hesitate to reach out to People Success, Legal, our Ethics Helpline, or your manager, to discuss your concerns and seek guidance.

### We Pro-Actively Seek Guidance.

Because this Code cannot address every situation, you are encouraged to seek guidance whenever you are unsure about the correct course of action.

- You can email your questions to [ethics@trellix.com](mailto:ethics@trellix.com).
- You can ask questions or report concerns to internal groups who specialize in handling such issues, including Legal, People Success, Corporate Security, or Information Security.
- If you are not comfortable raising an issue with your manager, you can raise the matter with your manager’s manager or any manager in your direct management chain.

### **We Report Our Concerns.**

It is important that you raise your voice if you have any concerns regarding any situation or conduct that might be in conflict or potential conflict with our Code. As a Trellix employee, you have a *responsibility* to report such concerns, which you can do in several different ways, such as through your manager, People Success, Legal or the [Ethics Helpline](#). Our external helpline allows anyone to report concerns with the option of remaining anonymous, where permissible under applicable laws.

### **We Do Not Retaliate.**

We do not tolerate retaliation against anyone who, in good faith, reports possible violations of this Code, or of the law or other company policies or guidelines, or who questions ongoing or proposed conduct, or who participates in an internal investigation. Anyone who retaliates or attempts to retaliate is subject to discipline, up to and including potential termination of employment.

Retaliation can include, among other things, material changes to work assignments and/or demoting, transferring, or terminating anyone for raising a question or speaking up in good faith about a possible violation of the Code, company policy, or law.

Anyone who believes they have experienced retaliation should contact the [Helpline](#) or [People Services](#) immediately.

### **We Act with Integrity and Respect.**

Our success is based on strong relationships of mutual respect and trust with each other, as well as with our customers, suppliers, distributors, and other business partners. To maintain these strong relationships, we treat everyone with whom we work with fairness, honesty, and respect.

We also expect our third-party business partners to have similar stated values to those in this Code, and to hold their own supply chain accountable to these expectations. Independent contractors, consultants, suppliers, distributors, and other business partners who conduct business with us risk termination of their relationship with us for actual or reasonably suspected violations of law or unethical conduct.

We avoid situations where conflicts of interest (addressed below) can interfere, or appear to interfere, with our ability to make sound business decisions.

### **We Do Not Engage in Any Form of Harassment.**

We are committed to providing a workplace free of harassment of any kind. We do not tolerate harassment of individuals by managers or co-workers.

### **We are an Equal Opportunity Employer and Promote Diversity and Inclusion.**

We value diversity and inclusion in every aspect of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs. We require it in our workforce and expect our independent contractors, consultants, suppliers, partners, distributors, and all others who do business with us to uphold this same value.

We are an equal employment opportunity employer. We do not discriminate against

employees or applicants on the basis of race, color, religion, sex, national origin, or ancestry, age, disability, medical condition, or genetic information, or on upon military or veteran status, pregnancy, marital status, gender, gender expression, gender identity, sexual orientation, or any other status or characteristic protected by applicable laws, regulations, or ordinances. For employees and applicants with disabilities, we also make reasonable accommodations, as required by law.

### **We Are Committed to Safety.**

We are committed to providing a safe workplace for employees, independent contractors, consultants, suppliers, partners, distributors, and others on our property. You must comply with the safety laws, standards, and guidelines that apply to our business.

### **We Do Not Tolerate Workplace Violence.**

Our commitment to safety is unwavering. We do not allow or tolerate violent behavior. This includes threatening behavior of any type (whether explicit or implicit), stalking of an individual, or any acts of physical or emotional abuse. Reports of workplace violence are treated seriously, will be investigated, and will result in appropriate action.

Examples of workplace violence include, but are not limited to:

- Shoving
- Physical attacks
- Verbal or written threats
- Throwing an object
- Destroying property

For additional information, review the Workplace Behavior/Discipline and Discharge Guideline.

### **We Are Responsible Corporate Citizens.**

We are committed to conducting business in a socially responsible way. We oppose human trafficking, forced, debt-bonded, indentured and slave labor. We do not tolerate, and we work to prevent, any of these practices in our operations and supply chain wherever we do business.

### **We Act with Integrity in Connection with Business Transactions.**

As a global business, we must comply with the laws of the many countries where we conduct business. Some of the most common laws we encounter pertain to **antitrust, anti-corruption, import-export, intellectual property, conflicts of interest, privacy, public communications, and doing business with a government entity**. Each of these topics is generally addressed below. However, if you have specific questions related to your compliance with these laws, you should contact Legal for help.

### **We Strictly Follow the Anti-Corruption and Anti-Bribery Laws.**

We have zero tolerance for, and strictly prohibit, all forms of bribery and corruption. We comply with all anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act (the “FCPA”), the UK Bribery Act, and other applicable bribery laws, and require

that all business transactions be accurately recorded in our books and records.

Offering or accepting bribes and facilitating or participating in corrupt activity of any kind is never permitted. We do not make facilitation payments on behalf of the company to any government official since many countries' laws define facilitation payments as bribes. Please consult our Anti-Corruption Compliance Manual for further guidance.

Our policy also prohibits any third parties, such as our channel partners (distributors, resellers, and other business partners), consultants, suppliers, to fully comply with the anti-corruption laws and from offering, promising, or paying bribes on our behalf, either directly or through any other third-party intermediary. If you believe a third-party may attempt to offer a bribe in connection with our business, you must never engage that third party.

Consult our Anti-Corruption Policy for Third Parties and the **Gifts, Meals, Entertainment, and Travel** ("GMET") policy to fully comprehend our anti-corruption expectations. You must always obtain approval as set forth in the relevant GMET policy before providing anything of value to a government official.

### **We Follow our Policies Regarding Gifts, Meals, Entertainment, and Travel (GMET).**

The exchange or provision of GMET may create a real or perceived conflict of interest or a situation where those expenditures could be viewed as a bribe under applicable laws and international standards. We expect you and all third parties to comply with the following principles when giving or receiving GMET:

- We comply with anti-corruption laws.
- The GMET must be for a legitimate purpose, such as to promote, demonstrate, or explain a Company product, position, or service.
- The GMET must not place the recipient under any obligation. We do not accept, offer, promise, or give anything of value with the intent to improperly influence any act or decision of the recipient or with the intent of compromising the recipient's objectivity in making business decisions.
- The GMET must be made openly and transparently, be reasonable and appropriate to the business relationship and local customs, and not cause embarrassment by its disclosure.
- Accurately record all GMET provided on our behalf.
- GMET may be provided to a government official (including employees of government agencies, public institutions, and state-owned enterprises) *only* in limited circumstances and *only* in accordance with the relevant GMET Policy.

### **We Comply with Antitrust/Competition Laws.**

Antitrust laws are designed to encourage competition for the benefit of the market and its participants. These laws prohibit restraining trade unreasonably. Our Antitrust and Competition Policy prohibits any agreements with competitors that would limit competition or unreasonably restrain trade.

Never discuss the following when dealing with competitors:

- Setting prices or other conditions of sale;

- Dividing markets by product, customer, or geography; or
- Setting production levels.

The consequences for violating antitrust laws are extremely serious. Both Trellix and the individual involved could be at risk of substantial criminal penalties.

While there are certain legal exceptions, the Antitrust and Competition Policy prohibits:

- Participating in specific practices that exclude our competitors.
- Punishing a customer who is doing business with a competitor by withholding or threatening to withhold benefits.

Follow our pricing policies precisely when dealing with distributors and resellers, the Antitrust and Competition Policy details our antitrust policy and standards.

### **We Comply with Import and Export Laws.**

In every country in which we do business, there are laws and regulations pertaining to imports and exports. Many of these laws and regulations restrict or prohibit the physical shipment of our products or the transfer or electronic transmission of software and technology to certain destinations, entities, or foreign persons. In many cases, the law requires an export license or other appropriate government approvals before an item may be shipped or transferred.

You have a responsibility to comply with these laws and regulations. Therefore, you must clear all goods through customs and must not:

- Proceed with a transaction if you know that a violation has occurred or is about to occur;
- Transfer controlled software and technology unless appropriate authorizations are obtained; or
- Apply an inappropriate monetary value to goods and services.

Violations, even inadvertent ones, could result in significant fines and penalties, denial of export licenses, loss of export privileges, and/or customs inspections and delays.

### **We Follow Our Conflicts of Interest Policies.**

A conflict of interest occurs when our interests are, or have the potential to be, incompatible with your interests. This can include situations where a third-party has interests that conflict with us and you receive benefits from or are associated with that third-party. Any activities or situations that have the appearance of a conflict of interest with Trellix must be avoided. This includes activities that compete with or interfere with the proper performance of your job role and responsibilities.

Activities involving personal, outside business, or family interests that can impair your ability to make decisions in our best interest must be avoided.

Use of Trellix's information or assets, except as permitted under our Acceptable Use Policy, must not occur. You should never use your role or position for personal gain.

### **We Disclose Any Potential or Actual Conflicts of Interest.**

You must disclose any conflict of interest - or an appearance of a conflict of interest with us,



following the procedures set forth in the Company's Conflict of Interest Manual. Failing to disclose a conflict, a potential conflict, or a perceived conflict is a violation of this Code.

Managers or other permitted persons to whom disclosures are made will determine, in consultation with Legal, People Success, or the Board, as necessary, if a conflict or a perceived conflict exists, and, if so, how to resolve it. In addition to these requirements, when conducting outside business activities, employees must also follow the Conducting Outside Business Guideline.

### **We Promote Privacy and Security.**

We each have a responsibility to comply with our privacy and security policies, including requirements for Information Security and Privacy Office reviews of most new products and upgrades, new vendors, and personal data transfers outside of our facilities. We also have a responsibility to comply with the privacy laws of the countries in which we do business.

We are committed to protecting personal data. We honor the legal rights of our employees and customers to control the use of their personal data and to take measures to ensure the safety and lawful collection and use of the personal data that our employees, customers, independent contractors, consultants, suppliers, partners, distributors, and others entrust to us.

### **Environmental, Health, and Safety Management and Compliance.**

Environmental laws, standards, requirements, and policies exist to protect the world and its inhabitants. Some of these laws apply to our worldwide business operations, practices, and products. We have a responsibility to understand and follow these requirements, including conserving energy, water, and other natural resources, managing materials and waste properly, and complying with environmental permits and health and safety requirements. We approach the resources used in creating our products and services with respect, and we pursue the reduction of waste and environmental impact from our business operations. We expect our suppliers and others in our business ecosystem to comply with all applicable environmental, health and safety laws and standards in their operations.

### **We Prepare Accurate Financial and Other Business Records.**

The business decisions we make are based on our financial and business records. It is our responsibility to ensure that our books and records are full, fair, accurate, timely, and understandable reflections of our business operations and activities.

Contractual arrangements, timecards, and expense reports, as well as any other records required in the course of our work, must be accurate, complete, and properly authorized. If questions arise, ask a manager for assistance. If you discover records that may be inaccurate, immediately report it to Finance or Legal. Falsification of records under any circumstances will not be tolerated.

We endeavor to conduct business and keep records consistent with relevant accounting standards, and we hire auditors to help us confirm we have done so. All employees and those acting under our direction are required to cooperate with our auditors.

## **We Protect Our Intellectual Property and Respect the Intellectual Property Rights of Others.**

New innovations and product developments are the core of our business and require protection. We legally protect the intellectual property we develop while also respecting the rights of others over their intellectual property.

### **We Protect Confidential Information.**

Confidential Information is valuable to us. It gives us a competitive advantage, helps maintain the trust of our customers, and sustains the solid reputation on which we were built. Confidential information means any information, in any format (paper or electronic), that is not in the public domain or generally known outside by us.<sup>1</sup> You are required to protect the confidential information of our employees,' customers,' and business partners.

### **We Safeguard Our Trademarks and Brand.**

Our trademarks and brand represent some of our most valuable assets, and protection is vital to maintain that value and their continued recognition in the marketplace. Our Brand Identity Guidelines help you determine when and how to use them. Regardless of the type of communication, to whom it is directed internally or externally, or whether it is developed by us or by third parties such as marketing agencies, channel distributors, or OEMs, our Brand Identity Guidelines must be followed.

You may not copy, reproduce, or transmit protected material, such as writing, artwork, music, video, photographs, movie clips, and software unless you have authorization or a license to do so.

Examples of things you must not do include, without limitation, the following:

- Copy protected material without permission;
- Reproduce protected artwork without permission;
- Disclose confidential information to any requestor without a non-disclosure agreement;
- Share confidential information with others after leaving the Company;
- Use protected music on an internal video without permission;
- Send unlicensed photographs to our marketing agency;
- Use movie clips in a product presentation and not for a “fair use” purpose;
- Encourage a colleague to use externally obtained confidential information without permission; and

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<sup>1</sup> Examples of confidential information include but are not limited to: The Company’s business and financial condition, roadmaps and business plans, financial data, pricing information, marketing plans and business development strategies, personnel files, research and technical data, inventions, and innovations, and the confidential information provided to us by third parties (such as customers and business partners).

- Pirate a software program for a team member.

### **We Protect Our Physical Assets.**

Our physical assets include facilities, equipment, and computer and communications systems. You are to use these assets primarily for our business. As a narrow exception, you may use computer and communications systems for reasonable personal use.

You are required to protect our physical assets from theft, loss, damage, and misuse, which includes allowing an unauthorized person access to them. Deliberate or accidental damage or loss of property must be reported to Information Security immediately.

While we respect your privacy, our desks, cubicles, offices, computing devices, and telephone equipment are not private. We reserve the right to monitor individual access and use of our data, information systems, email, and resources, including monitoring of content and usage analysis patterns for both voice and data communication. Reviewing private emails may be subject to restrictions or regulations in some jurisdictions. Please refer to our Acceptable Use Policy.

### **Representing Trellix.**

Our reputation and name are directly related to our values and must be upheld whenever we represent the company. When you speak or write in public about us, cybersecurity, or business and technology topics, your statements could reflect on the company. This includes situations where employees formally speak or write as our authorized representative, such as giving industry presentations, writing blog posts, or posting on our social media accounts. It also includes situations when employees speak or write about these topics on their personal accounts, such as on social media and community forums.

Our Social Media and Blogs Policy outlines key considerations and requirements for these situations and will help you remain aligned with the Code. Never reveal confidential information or overshare on social media. Once information has been shared on the internet, it cannot be taken back or deleted. If you are not sure about posting something on your online resumé or social channels, please contact Communications.

Improper disclosure of our or third-party confidential information can result in disciplinary action, including potential termination of employment, subject to applicable local law.

Certain topics or activities may also trigger additional pre-approval and review requirements. This includes discussions on threat research or taking leadership positions in trade associations or on boards. For more information, refer to the Antitrust and Competition Policy and the Personal Appointment to Boards of Outside Organizations Guidelines.

Always be accurate and clear about your relationship with the company. When posting content on personal sites, ensure that you state that the views are your own and do not necessarily reflect those of the company.

### **External Communications.**

In all our communications, and interactions with customers and potential customers, business partners and others, we always represent our products and services fairly and accurately.

Only authorized employees and approved spokespeople may make any public statements on our behalf to the media or investors.

If you are contacted by a reporter, blogger, analyst, or the public requesting comments on our behalf on a topic for which you are not expressly authorized by Marketing and Communications and the Senior Vice President of your business group to speak on behalf of the Company, do not respond. Immediately refer the inquiry to Communications and Legal.

### **Approvals and Waivers.**

This Code sets out expectations for your conduct. When certain situations require permission from management or another person before taking any action, you need to raise the issue promptly to allow enough time for the necessary review and approval.

In a particular circumstance, we may find it appropriate to waive a provision of the Code. To seek a waiver, speak with a manager, who will consider the request in consultation with others, such as Legal, Finance or People Success. Waivers of the Code of Conduct require the permission of our Chief Financial Officer, General Counsel, and Chief Human Resources Officer.

Any waiver of any provision of this Code for a member of the Board or an executive officer must be approved by the Board or by a duly authorized committee of the Board.

*-END-*