

The Bitdefender logo is displayed in white text against a dark blue background. The background features a grid of light blue lines and various data points, including circles and squares, some of which are labeled with alphanumeric codes like '19.78-C', '21.87-A', '39.06-C', '42.49-A', '65.18-B', '73.27-B', '79.51-B', '83.27-C', '88.96-B', '94.28-C', and '99.83-C'. Silhouettes of business professionals in suits are visible in the background, with one person in the foreground holding a briefcase.

# Bitdefender®

Guide

## Code of Business Conduct

[www.bitdefender.com](http://www.bitdefender.com)



# Code of Business Conduct

## Our Purpose

We are here to defend the welfare of all computer users. We will do whatever it takes to keep computer users safe from harm and help the Good prevail. Always!

## Bitdefender Core Values

### *INTEGRITY*

We use our best efforts to always be on the Good side. We are to the computer user what the medication is for the patient and the policeman to the society. Be fair, be modest and never give up your principles. Your behavior must be ethical in all business and private relationships.

### *INQUISITIVENESS*

We like the provocation of our minds; we know that any riddle has its answer. We love challenges and are always prepared to tackle them. We keep learning until we find the answer to any riddle and to any challenging situation with elegance and accuracy. We never wait for solutions from others and we are not ignorant or arrogant.

### *INNOVATION*

Being the avant-garde of the industry means being ahead of the industry, always running faster than our competitors. We train ourselves to be able to find new and innovative ways to do business, to be able to create top products and breakthrough in technology.

### *HEROISM*

We know that the only thing gained by following others is mediocrity. We are therefore not afraid of exploring uncharted territories. We definitely choose the untrodden path and give us a chance to conquer new worlds as pioneers.

## Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged for what we do.

When considering any action, it is wise to ask yourself: will this build trust and credibility for Bitdefender? Will it help create a working environment in which Bitdefender can succeed over the long term? Is the commitment I am making one I can follow through? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

# Business done with Integrity and Responsibility

## *UPHOLD THE LAW*

Bitdefender's commitment to integrity begins with complying with laws, rules and regulations wherever we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Bitdefender policies, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

## *ANTI-CORRUPTION*

It goes without saying that corruption is bad for business and it's bad for communities. Our principle of upholding the law applies also to laws barring corruption and bribery. That means we don't offer or take bribes or kickbacks from anyone, from government official to private individuals. In other words, we never offer or take anything of value to improperly influence a business or government decision, or to create a return obligation or expectation of favorable treatment. Additional information and guidelines are provided below and in our Anti-Corruption Policy.

### *Conflicts of Interest*

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Bitdefender may conflict with our own personal or family interests. We owe a duty to Bitdefender to advance its legitimate interests when the opportunity to do so arises. We must never use Bitdefender property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Bitdefender.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers, HR department or Compliance officer.

### *Gifts, Gratuities and Business Courtesies*

Bitdefender is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Bitdefender was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Bitdefender does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Bitdefender or customers, or would cause embarrassment or reflect negatively on Bitdefender's reputation.

### *Accepting Business Courtesies*

Most business courtesies offered to us in the course of our employment are offered because of our positions at Bitdefender. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Bitdefender to obtain business



courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Bitdefender maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Bitdefender is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Bitdefender business.

#### *Meals, Refreshments and Entertainment*

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

#### *Gifts*

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Bitdefender does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

#### *Offering Business Courtesies*

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Bitdefender. An employee may never use personal funds or resources to do something that cannot be done with Bitdefender resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Bitdefender.

## *COMPETITION*

We are dedicated to ethical, fair and vigorous competition. We will sell Bitdefender products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Bitdefender or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

### *Bitdefender Partners*

Bitdefender Partners such as resellers, distributors, country partners and other channel partners are important to Bitdefender. These partners, however, are independent businesses, and Bitdefender's relationships with them are subject to antitrust, competition, and other laws. Bitdefender may establish channel pricing and programs to help channel partners in selling Bitdefender solutions and services in accordance with Bitdefender policies and applicable laws.

### *Proprietary Information*

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

## *HUMAN RIGHTS*

We strive to respect and promote human rights by upholding the UN Guiding Principles on Business and Human Rights in our relationships with our employees, suppliers and partners, through our actions and policies.

As such, we expect our suppliers and partners to respect these values and avoid causing or contributing to human rights infringements through their business actions.

## *CONFIDENTIAL INFORMATION*

Integral to Bitdefender's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and

other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

#### *Selective disclosure*

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Bitdefender, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

### *PERSONAL DATA PROTECTION*

Bitdefender is a global cybersecurity leader protecting over 500 million systems in more than 150 countries and is committed to protect the personal information of its employees, customers, and business partners.

We are committed to protect all such data and we abide by the Privacy Principles:

*Lawfulness, Fairness and Transparency:* collection and processing of personal information lawfully and transparently inform about our privacy practices.

*Data Minimization:* collection and processing of personal information that is relevant for our use and necessary for specific and legitimate purposes.

*Accuracy:* collection of personal information that is reliable, accurate, complete, and current.

*Retention:* retention of personal information is done for as long as is necessary for specific and legitimate purposes.

*Security and Confidentiality:* personal information is processed carefully and securely.

More details regarding our privacy policies and procedures can be found here: <https://www.bitdefender.com/site/view/legal-privacy.html>

If you have concerns or specific requests, you can contact the Privacy Team at [privacy@bitdefender.com](mailto:privacy@bitdefender.com) or DPO at [dpo@bitdefender.com](mailto:dpo@bitdefender.com).

# Safe Environment for our Employees

## *RESPECT FOR THE INDIVIDUAL*

We all deserve to work in an environment where we are treated with dignity and respect. Bitdefender is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

## *WE CELEBRATE DIVERSITY AND INCLUSIVENESS*

Each of us brings a different viewpoint to the workplace making all of us think more broadly and allow us to be more creative collectively with the challenges of improving our services or developing new ideas and solutions. We embrace those differences and the social customs and cultural traditions around the world.

Bitdefender is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated should report the incident to his or her manager, Human Resources or Compliance officer.

## *HEALTH AND SAFETY*

Bitdefender is dedicated to maintaining a healthy environment for our employees and our collaborators, customers and suppliers.

When public safety is at issue, we take reasonable precautions to safeguard our employees, as well as the public. We comply with the laws, regulations, and practices related to the safety and health of the workplace and our products and services. In addition, we do not tolerate or permit threats, violence, or other disruptive behavior in our work environments. Our concern for a safe workplace extends to protecting information about us that the Company maintains. We hold the personal information of our employees, retirees, and their beneficiaries in strict confidence.

## *SPEAK UP CULTURE - OPEN AND HONEST COMMUNICATION*

At Bitdefender, everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Bitdefender will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not

possible or if an employee is not comfortable raising the issue with his or her manager or HR, Bitdefender's CEO does operate with an open-door policy.

### *ACCOUNTABILITY – RAISE YOUR CONCERNS*

Bitdefender's whistleblower policy is as follows:

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are not being met or are aware of violations of the Code, we must contact the HR department or the Compliance officer.

Bitdefender takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

### *SET TONE FROM THE TOP*

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Bitdefender, we want the ethics dialogue to become a natural part of daily work.

## Set Metrics and Report Results Accurately

### *ACCURATE PUBLIC DISCLOSURES*

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

### *CORPORATE RECORDKEEPING*

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Bitdefender policies and guidelines, as well as all regulatory and legal requirements.



All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Bitdefender's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Bitdefender books, records, processes or internal controls.

### *PROMOTE SUBSTANCE OVER FORM*

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Bitdefender, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Bitdefender is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although Bitdefender's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

### *USE OF COMPANY RESOURCES*

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Bitdefender are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Bitdefender network and our fellow employees, Bitdefender reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Bitdefender's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

## Media Inquiries

Bitdefender is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Public Relations Executive. No one may issue a press release without first consulting with the Public Relations Executive.

Each of us is an ambassador for our Company and is expected to embody Bitdefender's values and safeguard its brand and reputation. Public communication whether requested by the media, financial analysts, investors, industry analysts, or legislative entities, should be directed to Public Relations or Legal Department. Information that could have an impact on Bitdefender's image, including projections of orders, revenue, or earnings. This information may be released only through designated representatives.

## Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Bitdefender guiding principles, Code of Business Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

## Additional resources or Go-To representatives

Sometimes the Code may not have the answers to all your questions.

Don't worry! In such cases, you can start with our go-to resources:

- Your manager or next-level manager
- Human Resources Department
- Legal department
- Compliance & Ethics

Compliance consultancy channel: [ethics@bitdefender.com](mailto:ethics@bitdefender.com)

Compliance whistleblowing channel: <https://www.bitdefender.com/support/>

You can also find additional resources below.

[Privacy Policies](#)

[Brand Policy](#)

[Intellectual Properties](#)

[Legal Terms](#)

[Media Relations Center](#)

[Awards and Certifications](#)

Customer Support: [Consumer Solutions](#) and [Enterprise Solutions](#)