

Bitdefender Holding B.V. and its subsidiaries

Guide

Code of Business Conduct

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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!

This Code of Business Conduct (“**Code**”) applies to all directors, officers, employees and consultants (“**Covered Persons**”) of Bitdefender Holding B.V. and its subsidiaries (“**Bitdefender**”).

Bitdefender Core Values

TRUSTWORTHINESS

Seen as the end result of the highest form of behavior in business: ethical, effective, highly reliable.

INNOVATION

Seen as attracting and bringing the best out of the best talent to outsmart bad actors, to outpace competitors, beyond “business as usual.”

EXPERTISE

Seen as decades of accumulated knowledge and know how, continuously updated and put to work for customers.

RESPONSIBILITY

Seen as the duty of guardianship for the digital world with a thorough commitment to do what is necessary.

CUSTOMER ON CENTER STAGE

Seen as the ability to understand the customer’s perspective and needs with great empathy, as the only way to stay relevant and make a real difference.

DIVERSE PERSPECTIVES

Seen as valuing diversity of thought and inclusion for a flexible, collaborative, insightful and rewarding organization.

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, consultants, 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 and the Covered Persons’ commitment to integrity begins with complying with laws, rules and regulations wherever we do business. Further, each of us must have an understanding of Bitdefender 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 is bad for communities. Our principle of upholding the law applies also to laws barring corruption and bribery. That means we do not offer or take bribes or kickbacks from anyone, from government officials 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. Covered Persons with a conflict of interest question should seek advice from management, as the case may be. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, Covered Persons must seek review from management, their managers, the HR Department or the Compliance Department, as the case may be.

Gifts, Gratuities and Business Courtesies

Bitdefender is committed to competing solely on the merit of our products and services. We must 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.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain business or favorable treatment may be a criminal act subject to prosecution and conviction. If you are uncertain about the appropriateness of any proposed entertainment or gifts, you should consult with your manager or the Compliance Department at compliance@bitdefender.com. Additional information and guidelines are provided in our *Anti-Corruption Policy*.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our relationship with Bitdefender 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 goodwill with the firms that Bitdefender maintains or may establish a business relationship with.

Covered Persons 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 Bitdefender'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 Covered Person accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker, as the case may be, or having the courtesies known by the public.

Gifts

Covered Persons 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, Covered Persons 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 prior approval is obtained from management.

Covered Persons with questions about accepting business courtesies should talk to the management, their managers or the HR Department, as the case may be.

Offering Business Courtesies

Any Covered Person 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. A Covered Person 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.

TRADE LAWS

Our business involves international trade. Our Covered Persons are expected, when acting in relation to Bitdefender's business, to comply with applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting the conduct of business with specified individuals, companies or countries.

The United States and many other countries have laws that restrict or require licensing for the export or import of certain goods and services to other countries or to certain parties. These laws include, but are not limited to, EU laws and U.S. trade sanctions and embargoes, which generally prohibit U.S. companies, their subsidiaries, their employees, and third parties acting on their behalf from engaging in transactions or dealings involving certain countries and territories subject to embargoes imposed by the U.S. government, as well as specific entities and individuals identified on sanctions lists published by the U.S. Department of the Treasury's Office of Foreign Assets Control; U.S. export controls, which restrict exports from the United States and re-exports from other countries of goods, software and technology, and prohibit transfers of U.S. origin items to denied persons and entities; and antiboycott regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

If you have a question as to whether an activity is restricted or prohibited, please seek assistance from the Compliance Department at compliance@bitdefender.com before taking any action.

COMPETITION

We are dedicated to ethical, fair and vigorous competition. We will sell Bitdefender products and services based on what we believe are 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 Bitdefender 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 Bitdefender 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, consultants, 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.

ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING

We are committed to a work environment that is free from slavery and human trafficking, which includes forced labour and unlawful child labour.

We will not tolerate or condone slavery or human trafficking in any part of our global organization.

Bitdefender employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Bitdefender conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

This includes, but is not limited to, the following activities: Engaging in any form of trafficking of a person; Procuring commercial sex acts; Using forced labour in the performance of any work; Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority; Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/ contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions,

housing and associated costs (if provided by Bitdefender), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work; Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place; Charging applicants/candidates recruitment fees; If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

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, consultants, customers and other business partners. For purposes of this Code, "confidential and proprietary information" includes nonpublic information that, if improperly disclosed, could be useful to company competitors of and/or harmful to Bitdefender, its business partners, suppliers, clients or other stakeholders, or that would be material to a reasonable investor's decision to buy or sell securities of Bitdefender's business partners. 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 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. Covered Persons shall promptly inform the management, their managers, the HR Department or Compliance Department, as the case may be, upon becoming aware that confidential information has been wrongly obtained by someone outside Bitdefender, or if such information has been misplaced, mishandled or improperly disclosed.

PERSONAL DATA PROTECTION

Bitdefender is a cybersecurity leader protecting customers in more than 170 countries and is committed to protect the personal information of its employees, consultants, customers, and business partners.

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

- *Lawfulness, Fairness and Transparency*: collection and processing of personal information is done lawfully and transparently and by informing 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 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 or our DPO at dpo@bitdefender.com.

Safe Environment for our Covered Persons

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 counterparty and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any Covered Person who feels harassed or discriminated should report the incident to the management, his or her manager, Human Resources or Compliance Department, as the case may be.

HEALTH AND SAFETY

Bitdefender is dedicated to maintaining a healthy environment for our Covered Persons, customers and suppliers.

When public safety is at issue, we take reasonable precautions to safeguard our Covered Persons, 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 Bitdefender maintains. We hold the personal information of our Covered Person, 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 Covered Persons feel comfortable raising such questions. We all benefit

tremendously when Covered Persons 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, Bitdefender will take appropriate action. We will not tolerate retaliation against Covered Persons who raise genuine ethics concerns in good faith.

Covered Persons are encouraged, in the first instance, to address such issues with the management, their managers or the HR manager, as most problems can be resolved swiftly. If, for any reason, that is not possible or if a Covered Person is not comfortable raising the issue with the management, his or her manager or the HR Department, Bitdefender's CEO operates with an open-door policy.

ACCOUNTABILITY – RAISE YOUR CONCERNS

Bitdefender's **Whistleblower Policy** is as follows:

Current and former employees and officers may report Alleged Irregularities to the Compliance Department. An "**Alleged Irregularity**" is an irregularity of a general, operational or financial nature which is detected, or is suspected on reasonable grounds, within Bitdefender's organization, including the imminent or actual:

- performance of criminal acts, such as fraud, bribery or corruption;
- violation of applicable laws and regulations;
- violation of ethical or professional standards, including the standards set out in this policy;
- endangerment of public health, safety or the environment; or
- suppression, destruction, withholding or manipulation of information on the irregularity concerned.

Alleged Irregularities concerning the functioning of:

- the Compliance Department may be reported to any member of the board of directors of Bitdefender Holding B.V.;
- a member of the board of directors of Bitdefender Holding B.V., who is not the chairperson of the board of directors of Bitdefender Holding B.V., may be reported to the chairperson of the board of directors of Bitdefender Holding B.V.; and
- the chairperson of the board of directors of Bitdefender Holding B.V. may be reported to the Audit Committee.

Alleged Irregularities shall be reported in writing or in person. Anyone reporting an Alleged Irregularity should provide as much relevant and concrete information as possible in order for the Alleged Irregularity to be investigated properly. Each reported Alleged Irregularity shall be treated seriously.

Each whistleblower has the right, and shall be given the opportunity by Bitdefender, to consult with an independent confidential counsellor concerning the Alleged Irregularity reported by such whistleblower. Such counsellor shall be designated by the Compliance Department.

To the extent that the Dutch Act on the Whistleblowers' Institute (*Wet Huis voor Klokkenuiders*), as amended from time to time, is applicable in relation to Bitdefender Holding B.V., a whistleblower may also turn to the Whistleblowers' Institute (*Huis voor klokkenuiders*),

subject to and in accordance with the provisions of such Dutch Act, in order to report an Alleged Irregularity.

Bitdefender shall treat and safeguard as private and confidential the identity of each whistleblower, as well as any Alleged Irregularity reported by such whistleblower. Such information shall not be disclosed by Bitdefender, unless:

- with the consent of the whistleblower concerned;
- this is required under applicable laws or regulations and/or by any competent authority;
- or
- it concerns a disclosure to the professional advisors of Bitdefender or of the whistleblower concerned, subject to a duty of confidentiality and only to the extent necessary for any lawful purpose.

Bitdefender shall not take disciplinary action or other adverse employment action against a whistleblower in retaliation for properly reporting Alleged Irregularities in good faith, or for providing truthful information in good faith in connection with any investigation, inquiry, hearing or legal proceedings involving Alleged Irregularities. However, a whistleblower who knowingly reports Alleged Irregularities in a manner which is not truthful and in good faith, or does so in a reckless or frivolous manner, may be subject to legal and/or disciplinary action, including dismissal.

Nothing contained in this Code limits or otherwise prohibits any Covered Person from communicating with, filing a charge or complaint, or otherwise participating in any investigation or proceeding with any U.S. federal, state or local governmental agency or commission, including providing documents or other information to such institution, without notice to Bitdefender.

Any Alleged Irregularities regarding matters other than accounting or audit will be investigated by our Compliance Department.

Initially, the Compliance Department will determine if there is an adequate basis for an investigation. Our Compliance Department will promptly notify the Legal Department, who will then determine if the board of directors of Bitdefender Holding B.V. and the Audit Committee need to be contacted as per the *Whistleblower Investigation Procedure*. If so, the Compliance Department and the Legal Department will work together to appoint one or more investigators to promptly and fully investigate any claims. The Audit Committee may also appoint others to oversee the investigation. If the reporting person identified himself or herself, the Compliance Department will also confidentially tell the reporting person that the complaint was received and whether an investigator has been assigned. The reporting person will be given the investigator's name and contact information.

If the investigation confirms that a violation has occurred, Bitdefender will promptly take appropriate corrective action against the persons involved. This may include termination. The matter may also be referred to governmental authorities that may investigate and initiate civil or criminal proceedings.

The Compliance Department will maintain a log of all Alleged Irregularities, tracking their receipt, investigation, and resolution. The valid Alleged Irregularities will be reported by the Legal Department to the board of directors of Bitdefender Holding B.V., as per the *Whistleblower Investigation Procedure*.

Any Alleged Irregularities concerning accounting and auditing matters for our Covered

Persons shall be governed by the *Accounting & Auditing Whistleblower Policy*.

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 Covered Persons and for taking the appropriate steps to deal with such issues. Managers should not consider Covered Persons' 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.

CONFLICT MINERALS

"Conflict Minerals" are considered as any that meet the following two conditions:

1. That such minerals are any of the following:
 - a. Cassiterite, the metal ore from which tin is extracted;
 - b. Columbite-Tantalite, known as coltan, the metal ore from which tantalum is extracted;
 - c. Gold;
 - d. Wolframite, metal ore from which Tungsten is extracted; and
2. That these minerals were extracted from the Democratic Republic of Congo, Angola, Burundi, Central African Republic, Republic of Congo, South Sudan, Tanzania, Uganda, Zambia or any other Country considered as conflict area in the future.

As such, Bitdefender's products and services are free from any Conflict Minerals. All Bitdefender providers must make sure that any goods/services offered to Bitdefender are also "Conflict Minerals" free. By providing any goods/services to Bitdefender, you acknowledge the adoption and use of OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights for internal use and within your extended supply chain.

Any breach of this "Conflict Minerals" section entitles Bitdefender to immediately terminate any business relationship and to any and all damages incurred as a result of such breach, including image damages and the like.

Set Metrics and Report Results Accurately

ACCURATE PUBLIC DISCLOSURES

We will make certain that all disclosures made in public documents are full, fair, accurate, timely and understandable. This obligation applies to all Covered Persons, including all financial executives, with any responsibility for the preparation for such documents, 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.

Financial transactions carried out by Bitdefender shall be recorded properly, accurately and fairly, in the correct accounts and within the relevant accounting period, all with due observance of applicable laws, regulations and accounting policies. Bitdefender Holding B.V. is committed to providing its shareholders with information about its financial condition and results of operations as required by the laws of the United States and all other relevant jurisdictions. Covered Persons who are responsible for these disclosures, including Bitdefender Holding B.V.'s principal executive, financial controller and accounting officers, must use reasonable judgment and perform their responsibilities honestly, ethically and objectively in order to ensure that this disclosure policy outlined in this Code is fulfilled. Bitdefender Holding B.V.'s executive management is primarily responsible for monitoring its public disclosures.

Covered Persons should inform the management, their managers or the HR Department, as the case may be, if they learn that information in any public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future 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

Bitdefender 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.

Covered Persons and those who represent Bitdefender are trusted to behave responsibly and use good judgment to conserve Bitdefender 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 Bitdefender-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 Covered Persons, Bitdefender reserves the right to monitor or review all data and information contained on a Covered Person's company-issued computer or electronic device, the use of the Internet or Bitdefender's intranet. We will not tolerate the use of Bitdefender 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 Bitdefender resources should be directed to your manager.

Media Inquiries

Bitdefender is a high-profile company in our community, and from time to time, Covered Persons 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 Bitdefender, we should direct all media inquiries to the public relations channel, at bd_pr@bitdefender.com. No one may issue a press release without first consulting with the public relations channel.

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

When expressing personal views in any media, including television, radio, chat rooms, forums, social media platforms and other electronic media, it should be clear that such statements are personal and do not represent Bitdefender's point of view.

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’s guiding principles, the Code and Bitdefender policies?
- Have I been asked to misrepresent information or deviate from the normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look like 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?

Monitoring Compliance and Disciplinary Action

Bitdefender’s management, under the supervision of the board of directors of Bitdefender Holding B.V. or a duly authorized committee thereof or, in the case of accounting, internal accounting controls, auditing or securities law matters, the Audit Committee, shall take reasonable steps from time to time to (i) monitor compliance with this Code, (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of this Code, and (iii) when appropriate, report violators to the appropriate authorities.

Disciplinary measures for violations of this Code will be determined in the board of directors of Bitdefender Holding B.V.’s sole discretion and may include, but are not limited to, counselling, oral or written reprimands, warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution. Violations will be determined by a fair process, and any accused violator will be given an opportunity to present his or her version of the events at issue prior to any determination of appropriate discipline.

Bitdefender’s management shall periodically report to the board of directors of Bitdefender Holding B.V. or a duly authorized committee thereof on these compliance efforts including, without limitation, periodic reporting of alleged violations of this Code and the actions taken with respect thereto.

Amendments and Waivers

Pursuant to a resolution to that effect, the board of directors of Bitdefender Holding B.V. may amend or supplement this Code and may review and authorize waivers, subject to ongoing compliance with applicable law requirements.

Additional resources or Go-To representatives

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

Do not worry! In such cases, you can start with our go-to resources:

- Your manager or next-level manager
- HR Department

- Legal department
- Compliance Department

Compliance consultancy channel: compliance@bitdefender.com

Compliance whistleblowing channel: <https://www.bitdefender.com/site/view/legal-ethical-compliance.html>. Alleged Irregularities shall be reported in writing or in person.

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](#)