

GMO GlobalSign (“GlobalSign”, “Company”, or “we”) is an identity services company providing cloud-based, highly scalable PKI solutions for enterprises needing to conduct safe commerce, communications, content delivery and community interactions.

Our Mission Statement

GlobalSign enhances digital life by making interactions safer with trusted identities.

Our Values

Trust is everything in our business.

We:

- rigorously apply best practices to managing our customers’ trusted identities
- demonstrate integrity and trust, being as open as possible with all of our dealings internally and externally

We deliver value, and excellence in service.

We:

- provide creative and innovative solutions to business needs
- drive business value and cost effectiveness
- delight our customers with superlative service

Our Staff are our most valuable asset.

We:

- treat people fairly and well, demonstrate respect and embrace diversity
- excite, unleash and support the passion, creativity and innovative spirit within our staff
- provide tools, systems and training that facilitate effective business
- communicate and collaborate with shared goals to achieve success

Purpose

The purpose of this Code of Conduct (the “Code”) is to ensure our business is conducted in a professional manner, in accordance with applicable laws and regulations and with the highest standard of ethics and values.

The Code is a general guide to acceptable and appropriate behavior at GlobalSign and employees are expected to comply with it; however, it does not contain all of the detailed information employees will need during their employment. This Code is for guidance only and does not form part of any contract of employment. It is meant to supplement, but does not replace, other local policies or employee handbooks that may contain more specific rules or procedures in the country where the employee works.

Employees should apply the Code with common sense and with a goal of compliance with both the letter and spirit of the rules presented. Employees should familiarize themselves with the Code so that the employee can easily determine if any proposal or act would constitute a violation. Every employee is responsible for their actions.

The absence of a specific guideline practice or instruction covering a particular situation does not relieve an employee from exercising the highest ethical standards applicable to the circumstances. If an employee has doubts regarding a questionable situation that might arise, the employee should immediately consult their supervisor or higher level.

Anti-Bribery and Anti-Corruption

GlobalSign is committed to conducting its business ethically and in compliance with all applicable laws and regulations that prohibit improper payments to obtain a business advantage.

GlobalSign strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and GlobalSign to possible criminal prosecution, reputational damage or other serious consequences. Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, inducements, rewards or any other payment offered, promised or provided to obtain an undue commercial, contractual, regulatory, personal or business advantage.

These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of GlobalSign's business. While we accept that the occasional giving and acceptance of gifts and hospitality may be a legitimate business contribution to good business relationships, it is essential they do not influence, or could be seen as influencing, business decision making.

We must consider whether the giving or receiving of a gift of hospitality is appropriate and proportionate. We also appreciate that the practice of giving business gifts varies between countries and what may be normal and acceptable in one country may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

The prohibition on bribery and other improper payments applies to all business activities but is particularly important when dealing with government officials. Anti-bribery laws make it unlawful to bribe a government official to gain an "improper business advantage." An improper business advantage may involve efforts to obtain or retain business, as in the awarding of a government contract, but also can involve regulatory actions such as licensing or approvals.

Every employee has an obligation to:

- Be familiar with applicable aspects of this policy;
- Ask questions if the policy or action required to take in a particular situation is unclear;
- Properly manage and monitor business activities conducted through third parties;
- Be alert to indications or evidence of possible wrongdoing; and
- Promptly report violations or suspected violations through appropriate channels.

Financial Integrity

GlobalSign must keep accurate books and records that reflect transactions and asset dispositions in reasonable detail, supported by a proper system of internal accounting controls. These requirements are implemented through GlobalSign's standard accounting rules and procedures, which all employees are required to follow. Special care must be exercised when transactions may involve payments to foreign officials. Off-the-books accounts should never be used. Facilitation or other payments to foreign officials should be promptly reported and properly recorded, with respect to purpose, amount and other relevant factors. Requests for false invoices or payment of expenses that are unusual, excessive or inadequately described must be rejected and promptly reported. Misleading, incomplete or false entries in GlobalSign's books and records are never acceptable.

Conflict of Interest

All persons employed by GlobalSign owe a duty of loyalty to the Company. Employees must avoid any situation or activity that compromises, or may compromise, their judgement or ability to act in the best interest of the Company.

A conflict of interest arises when an employee or an employee's family member's personal activities or relationships interfere, or appear to interfere, with the employee's ability to act in the best interest of the Company. A "family member" includes a spouse, domestic partner, child, sibling, parent, stepchild, stepparent, as well as mother-, father-, son-, daughter-, brother-, or sister-in-law, and any other person living with the employee. An actual conflict of interest need not exist to constitute a violation of the standards of conduct. Activities that create the appearance of conflict of interest must also be avoided.

A conflict can happen when:

- The employee supervises or conducts business with someone with whom the employee has a close personal relationship.
- The employee owns or has a substantial interest in one of our suppliers, customers, business partners or competitors.
- The employee owns or does work for a company that competes, does business or wants to do business with GlobalSign. Serving in an advisory role or on the board of directors for such a company can also pose a conflict.
- The employee takes for themselves a business opportunity that is meant for GlobalSign.
- The employee or a family member starts or controls a company that provides similar services as those of GlobalSign.
- The employee provides paid consulting services on the weekend to a Company customer or supplier.
- The employee hires a family member for a job and gives them bonuses or favoritism (referred to as “nepotism”). This can also occur when an employee suggests or has a role in hiring a family member’s company to do work for GlobalSign.
- The employee uses confidential information for their own advantage, especially those relating to trade secrets, insider trading, and other types of securities violations.

If an employee discover that a personal activity, investment, interest or association could compromise —or even appear to compromise — their objectivity or their ability to make impartial business decisions, they must disclose it immediately to their supervisor/manager, then the Human Resources or Legal Department. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed.

Upon disclosure of the information described above, the Company will take appropriate steps to protect against any actual or potential conflict of interest. Such steps may include:

- requiring the employee to refrain from being involved in any decisions made by the Company regarding its dealings with such person, business or enterprise;
- requiring the employee to refrain from being involved in any dealings on behalf of the Company with such person, business or enterprise; or
- requiring the employee to dispose of their interest in such business or enterprise if they wish to remain in the Company’s employ.

Workplace Respect and Civility

Employees are expected to act in a civil and respectful manner in the workplace. Some guidelines on prohibited behavior include:

- Behavior that is rude, condescending or otherwise unprofessional;
- Disparaging other employees;
- Harassment, bullying, or discrimination of any kind (including sexual harassment);
- Using offensive, foul, or abusive language;
- E-mail messages that are defamatory; or
- Disorderly conduct on the Company’s premises and/or during working hours for any reason.

Gifts or ‘Kickbacks’

Employees must never accept any ‘kickbacks’, loans, discounts, favors or gifts of other than nominal value, or personal payments of any kind, from any person or business enterprise that:

- competes with the Company; or
- purchases or sells, or seeks to purchase or sell, goods or services to, or from, the Company.

Outside Employment or Business Activity

During working hours, employees are expected to devote their full time and attention to the business and the affairs of the Company.

Generally, GlobalSign allows employees to hold secondary employment and establish and run businesses outside of working hours as this can help employees build and enhance skills and networks which could assist with their role at GlobalSign.

If an employee wishes to engage in employment or business activity outside their employment with the Company, they must first disclose to the Company the nature and extent of the proposed employment or business activity and obtain the Company's written approval. Approval may be withheld if the Company reasonably determines that their proposed outside employment or business activity could conflict or compete with the interests of the Company, could negatively affect their job performance or attendance or could result in non-compliance with local working time laws or regulations. GlobalSign also wants to ensure employees have a healthy work-life balance.

The general rule is that permission will not be unreasonably withheld if the second job is carried on outside of working hours, does not use GlobalSign time, resources or equipment, and it does not interfere with the employee's work, achievement of the performance standards required by the employee's role and does not fall into any of the categories below:

- The job is for a business which in any way competes with GlobalSign
- The job is for a business which is connected in any way with GlobalSign's competitors
- The job is for a business which creates a conflict of interest which cannot be mitigated
- The job is for a business that could bring GlobalSign into disrepute (A non-exhaustive list would include businesses which could cause moral outrage, are involved in illegal practices and businesses involving violence.)

Safety and Working Conditions

It is our policy to conduct our operations to ensure that, so far as is reasonably practicable, the health and safety of all of our employees (and the general public in so far as our operations may affect it) are not harmed. All employees also have a duty to ensure that they discharge their duties in accordance with any applicable works procedures, rules and risk assessments which are specially devised to ensure the health and safety of all employees whilst at work (or the general public so far as they are affected by our operations).

Health and safety training will be provided to all employees at the beginning of employment, and on a periodic basis.

Effective health and safety will only be achieved by enthusiasm and interest from employees and management at all levels. If an employee believes that there are risks to health and safety which management have not addressed, they should report the employee concerns to their local General Manager. Employees will not be subjected to any form of retaliation for having done so. We consider such reporting to be an important part of keeping the workplace safe.

Anti-Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. See the "GlobalSign Anti-Slavery and Human Trafficking Policy" for more details.

Non-Discrimination

Employment at the Company is based upon merit, ability and qualifications. GlobalSign will ensure equal opportunity for all people without regard to race, color, religious creed, national origin, sex, sexual orientation, age, ancestry or disability, or other status protected by federal, state, local or other law. Our commitment applies to all areas of employment including hiring, training, placement, promotion, compensation, and benefits.

Our employees, and applicants for employment, shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes. We shall, at all times, strive to work within legislative requirements as well as promoting best practices.

The long-term objective of GlobalSign is that the composition of our workforce should reflect that of the community and that all employees should be offered equal opportunities to achieve their full potential. We are committed to a program of action to make this policy effective and to bring it to the attention of all employees. The principle of non-discrimination and equality of opportunity applies equally to the treatment of visitors, clients, customers and suppliers by members of our staff and also, in some circumstances, ex-employees.

We aim to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed above. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are regularly reviewed to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

We will regularly monitor the effectiveness of this policy to ensure it is achieving the objectives stated by monitoring the composition of job applicants and the benefits and career progression of its workers.

We are committed to providing relevant training for all staff on their responsibilities and duties under this policy.

Anti-Harassment / Anti-Bullying

GlobalSign aims to ensure that all of our employees are treated with dignity and respect, and are free from harassment, intimidation or other forms of bullying at work.

GlobalSign has a duty to provide our employees with a safe place and system of work. This includes a workplace free from harassment, intimidation and bullying. We also have responsibilities not to harass or discriminate against employees on the grounds of their sex, sexual orientation, marital status, gender reassignment, race, religion, colour, nationality, ethnic or national origin, disability, HIV positive/AIDS status or age. In some situations, we may also be responsible for the actions of our employees towards each other, and towards third parties. In certain circumstances harassment can amount to unlawful discrimination. This policy serves to demonstrate our commitment to identifying and, wherever possible, eliminating such unlawful behaviour.

Managers have a specific responsibility to operate within the boundaries of this policy and to facilitate its operation by ensuring that employees understand the standards of behaviour expected of them and by identifying and acting upon behaviour that falls below these standards. All employees are responsible for treating their colleagues with dignity, and for the success of this policy and should ensure that they take the time to read and understand it. Employees should disclose any instances of harassment or bullying of which they become aware to their local office management.

We will ensure that any employees who may be involved with investigations or administrative tasks carried out under this policy receive regular and appropriate training to assist them with these duties.

Administration

While this Code of Conduct is intended to provide general guidance of acceptable and appropriate behavior, no set of standards can cover all circumstances. These guidelines may be varied as necessary to conform to local law or contract.

Questions about the Code or its applicability to particular circumstances should be directed to local managers, local Human Resources or the Legal Department.

Any employee who breaches this Code of Conduct is subject to disciplinary action, up to and including discharge and possible criminal prosecution. Any employee who has reason to believe that a violation of this policy has occurred, or may occur, must promptly report this information, in accordance with the Company's whistleblowing policy. There will be no retaliation against an employee who in good faith reports a violation or suspected violation. See the "GlobalSign Whistleblowing Policy" for more details.

About GlobalSign

GlobalSign is the leading provider of trusted identity and security solutions enabling businesses, large enterprises, cloud service providers and IoT innovators around the world to secure online communications, manage millions of verified digital identities and automate authentication and encryption. Its high-scale Public Key Infrastructure (PKI) and identity solutions support the billions of services, devices, people and things comprising the Internet of Everything (IoE).

