



GMO GLOBALSIGN CODE OF CONDUCT

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About GlobalSign

GMO GlobalSign (“GlobalSign”, “Company”, or “we”) 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. Our high-scale Public Key Infrastructure (PKI) and identity solutions support the billions of services, devices, people, and things comprising the Internet of Everything (IoE).

Our People

Trust is a people thing. Despite the ever-evolving nature of technology, the importance of trust between people remains constant. Our global and diverse workforce is the cornerstone of our success. They each bring their unique skill, knowledge, and perspective to create a stable tapestry of customer centric innovation. Our people are our most valuable asset, embodying our mission and values, ensuring our continued growth. As technology evolves, the need for trusted, verified, and easily deployed digital identities to secure our connections will continue to grow globally. GlobalSign is here to provide security through digital identity for everyone and everything.

Our Mission Statement

Be the global identity authority providing security, convenience and trust through digital identities for everyone and everything. GlobalSign enhances digital life by making interactions safer with trusted identities.

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.

This Code applies to all persons working for GlobalSign or on our behalf in any capacity, including employees, directors, officers, temporary service workers, volunteers, and independent contractors (“you” or “worker”).

It is a general guide to acceptable and appropriate behavior at GlobalSign and workers are expected to comply with it; however, it does not contain all of the detailed information workers will need during their employment. This Code is for guidance only and does not form part of any contract of employment or service. 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 you work.

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

Anti-Bribery and Anti-Corruption

GlobalSign is committed to conducting its business ethically and in compliance with laws and regulations that prohibit payments and other actions to obtain an improper 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 persons 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 a commercial, contractual, regulatory, personal or business advantage.

While we understand that the occasional giving and acceptance of small gifts and hospitality may be a legitimate business practice to foster good business relationships, it is essential they do not influence, or could be seen as influencing, business decision making. You 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 consideration of all the circumstances the gift or hospitality is reasonable and justifiable.



Financial Integrity

GlobalSign must keep accurate books and records that reflect payments and transactions in reasonable detail, supported by an effective system of internal accounting controls. These requirements are implemented through GlobalSign's standard accounting rules and procedures, which all workers are required to follow. Special care must be exercised when transactions may involve payments to foreign officials or any activity that could facilitate tax evasion or fraud. 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 workers owe a duty of loyalty to the Company. Workers 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 a worker or their family member's personal activities or relationships interfere, or appear to interfere, with the worker's ability to act in the best interest of the Company. 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:

-  A worker supervises or conducts business with someone with whom the worker has a close personal relationship.
-  A worker has an ownership or financial interest in one of our suppliers, customers, business partners or competitors.

- ✔ A worker owns or does work for a company that competes, does business with 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.
- ✔ A worker takes for themselves a business opportunity that is meant for GlobalSign.
- ✔ A worker or their family member starts or controls a company that provides similar services as those of GlobalSign.

If a worker discovers 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, and the Human Resources or Legal Department. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed.

Gifts or ‘Kickbacks’

Workers 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 GlobalSign, or purchases or sells, or seeks to purchase or sell, goods or services to, or from, GlobalSign.

Information Security, Data Protection and Artificial Intelligence (AI)

At GlobalSign, the security of our services and the protection of customer information are of the highest priority. Every worker plays a critical role in maintaining the integrity, confidentiality, and availability of our systems and data. Our privacy practices are based on ISO 27701 in line with the EU General Data Protection Regulation (GDPR), applying across our global network and all information collected for issuing our products and services. Workers must handle personal data responsibly and in compliance with all applicable data protection laws, internal training and policies including those relating to information security, data protection and artificial intelligence.

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 our workers (and the general public in so far as our operations may affect them) are not harmed. All workers 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 workers 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 workers at the beginning of employment and on a periodic basis.

Effective health and safety will only be achieved by enthusiasm and interest from workers and management at all levels. If a worker believes that there are risks to health and safety which management have not addressed, they should report their concerns to concerns@Globalsign.com. Workers 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.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labor, child labor and human trafficking. Modern slavery is a crime and a violation of fundamental human rights.

GlobalSign strictly prohibits the use of modern slavery in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organization or in any of our supply chains.

The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Conflict Minerals

We recognize the need to support the elimination of human rights abuses that are being created by the exploitation and trade conflict minerals originating in the Democratic Republic of the Congo and surrounding countries which is helping to finance armed conflict characterized by extreme levels of violence. GlobalSign does not directly source or procure conflict minerals from mines or smelters or any other “upstream” suppliers for our own products and solutions. In addition, for our own products and solutions, GlobalSign does not include any products from component manufacturers, product manufacturers, original equipment manufacturers (OEMs) or any other “downstream” suppliers.

We do recognize that as part of our day-to-day business operations we may purchase and use electronics and equipment supplied by third parties that could contain conflict minerals. We therefore expect our suppliers to share our corporate values and establish their own conflict minerals policies, due diligence frameworks and management systems to prevent conflict minerals being included in the products sold to GlobalSign.

Fair Treatment and Equal Opportunities

GlobalSign ensures that all workers are treated with dignity and respect and are free from harassment, intimidation, or other bullying at work. This includes ensuring that our workers are afforded an employment environment that is free from violence, corporal punishment, physical, psychological, sexual, and verbal harassment, unreasonable restrictions on entering or exiting work facilities, or other abusive conduct.

Employment at GlobalSign is based upon merit, ability and qualifications. We will ensure equal opportunity for everyone 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 facets of employment including hiring, training, placement, promotion, compensation, and benefits.

The long-term objective of GlobalSign is that the composition of our workforce should reflect that of our communities and that all workers 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 workers. 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.

We aim to ensure that no job applicant receives less favorable treatment on any unlawful grounds above. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their 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.

Freedom of Association and Collective Bargaining

GlobalSign respects, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

Wages and Remuneration

GlobalSign pays our workers punctually and provides compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws. We provide our workers with the basis on which workers are being paid in a timely manner via wage statements or similar documentation. Deductions from wages as a disciplinary measure are not permitted.

Supply Chain

GlobalSign expects our suppliers, vendors, partners, resellers, service providers, and other third parties who provide goods and services to GlobalSign to uphold the same values as GlobalSign, and we require all Suppliers to affirm their acceptance and compliance with the principles of our [Supplier Code of Conduct](#), and a commitment to continuous improvement.

Environmental Impact

GlobalSign is committed to protecting the earth's vital resources and promoting sustainable economic development. We understand the harmful effects our operations may have on both the local and global environment and are committed to reducing those effects, as set out in our [Environmental Policy](#). All workers are required to comply with GlobalSign's policies and initiatives that support our environmental objectives, including those aimed at reducing environmental impact and promoting sustainable practices across our operations.

Code Violations

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 can be directed to managers, Human Resources or concerns@globalsign.com.

Any worker who breaches this Code of Conduct is subject to disciplinary action, up to and including discharge and possible criminal prosecution. Any worker who has reason to believe that a violation of this Code has occurred, or may occur, must promptly report it as soon as possible to GlobalSign at: concerns@globalsign.com. There will be no retaliation against a worker who in good faith reports a violation or suspected violation.

