

Securing Our Success

Coalfire Systems, Inc.

Letter From Brad.

What we do at Coalfire impacts real businesses and real lives: we help companies protect their data through advising, assessment, and cyber security services. Data integrity touches every country and every person, so we aim to deliver on our mission better than anyone else. It's not enough to disrupt the status quo with superior technology and services. Commitment to being a trusted security partner depends on more than our unparalleled technology and services – it relies on our reputation as an ethical company, one that our clients and partners can trust because we operate with honesty, integrity, and accountability.

As a global leader, Coalfire is committed to working with our stakeholders to drive the highest standards of ethical behavior throughout the organization, and to ensure that we exercise good judgement to consistently make the best decisions. We do our best to balance urgency without compromising our integrity. We are more likely to make ethical choices with honesty, accountability, and integrity guiding our decisions. The very nature of our business requires a culture of responsibility.

Our values and culture are enshrined in Coalfire's Code of Ethics and Business Conduct ("Code"), which is aligned with our business practices and policies. These are the rules we follow as we do our work each day. The Code applies to all Coalfire employees, subsidiaries, contractors, officers and entities. We pride ourselves in offering a safe environment to raise concerns. We lead with kindness and act with intent to **secure our success** in these endeavors.

Our Code will empower us as we innovate, collaborate, and win as an ethical company. Thank you for your diligence in upholding our Code.

Regards,
Brad Little

TABLE OF CONTENTS

[Letter from Brad](#)

1. SUCCESS BY MAKING GOOD DECISIONS

[1.1 We Use Our Code as a Guide](#)

[1.2 We All Play an Important Role](#)

[1.3 We Lead by Example](#)

2. SUCCESS BY SPEAKING UP

[2.1 We Say Something if We See Something](#)

[2.2 We Don't Retaliate](#)

[2.3 We Accept Consequences for Violating Our Code](#)

[2.4 We Handle Concerns with Respect](#)

[2.5 We Take Our Commitment to Investigations Seriously](#)

[2.6 We Report Concerns](#)

3. SUCCESS ACHIEVED TOGETHER

[3.1 We Take Workplace Safety Seriously](#)

[3.2 We Don't Allow Harassment and Bullying](#)

[3.3 We Don't Tolerate Sexual Harassment](#)

[3.4 We Encourage Diversity, Equity, and Inclusion](#)

[3.5 We Respect Employee Privacy](#)

[3.6 We Avoid Conflicts of Interest](#)

4. SUCCESS WITH OUR COMPANY AND REPUTATION

[4.1 We Safeguard Communications Equipment, Systems, and Assets](#)

[4.2 We Properly Handle Expense Management](#)

[4.3 We Properly Manage Confidential Information](#)

[4.4 We Responsibly Handle Records Management](#)

[4.5 We Use Social Media Responsibly](#)

[4.6 We Use Coalfire's Brand Appropriately](#)

[4.7 We Don't Respond to Media Inquiries Independently](#)

5. SUCCESS WITH OUR CLIENTS

[5.1 We Keep Accurate Client Records](#)

[5.2 We Prioritize Privacy](#)

[5.3 We Don't Bribe or Take Kickbacks](#)

[5.4 We Support Fair Competition](#)

6. SUCCESS WITH OUR GLOBAL COMMUNITY

[6.1 We Respect the Laws of All Countries](#)

[6.2 We Comply with Global Trade Compliance](#)

[6.3 We Use AI Responsibly](#)

[6.4 We Advocate for Human Rights](#)

[6.5 We Carefully Participate in Political Activities](#)

7. SUCCESS WITH OUR PARTNERS

[7.1 We Select Trusted Partners](#)

[7.2 We Select Trusted Suppliers](#)

[7.3 We Adhere to Appropriate Gifts, Hospitality, & Travel Choices](#)

8. SUCCESS WITH OUR INVESTORS AND THE PUBLIC

[8.1 We DON'T Trade on Insider Information](#)

[8.2 We Protect Intellectual Property](#)

[8.3 We are Smart on Social Media](#)

9. SUCCESS WITH OUR CODE

9.1 We are All Responsible



1. SUCCESS BY MAKING GOOD DECISIONS

1.1 We Use Our Code as a Guide

We use our Code combined with our values as guiding principles to create a work environment where respect, honesty and integrity are a priority. Our Code applies to everyone: each employee, all subsidiaries and controlled affiliates, contractors, and our Board of Directors (for purposes of this Code, collectively “Employee”). Our Code will be enforced regardless of tenure, role, or location.

While working for Coalfire, Employees might face a situation or observe a situation and not know the next step. Our Code is here as a guide to living Coalfire’s values and preserving our culture and reputation.

1.2 We All Play an Important Role

We engage in business on behalf of Coalfire with a responsibility to use good judgement, regardless of tenure, role, or location. Nothing in this Code or any Coalfire policy is intended to limit or interfere with Employees’ rights under the law. Coalfire has other policies and processes that govern conduct, performance, and behavior. Policy violations that are not Code violations will be handled under the relevant policy or procedure.

Unethical, unlawful behavior is wrong and can damage Coalfire’s reputation and an individual’s reputation. In our transparent and digitally connected world, information about bad acts becomes public very quickly.

How we secure our success...

- **Stop.** Did an employee experience or observe a situation that makes them uncomfortable? They should stop and consider how to approach the situation.
- **Think.** Is their approach consistent with Coalfire’s culture and the values and guidance in this Code? They should think about how they can preserve the culture and values to keep Coalfire an ethical and safe place to work.
- **Ask.** Have questions or need help? They should talk to their manager, another manager, HR, or the Office of Ethics & Compliance by emailing Compliance@Coalfire.com for help. Someone is always available to help them make a good decision.

Learn More

- Coalfire Policies and Programs Spark Page (*internal*)

1.3 We Lead by Example

We expect our managers to lead by example and uphold the Code, maintaining an ethical and fair work environment for their teams. The way managers make decisions, handle concerns, different opinions, and even difficult situations, will set the foundation for trust with our teams, clients, and stakeholders. The team's success depends on the culture of integrity we all build together.

How we secure our success...

- We discuss ethics and integrity openly and be clear that all work is to be performed ethically.
- We lead by example, by showing how to engage in ethical decision-making.
- We will always listen to our teams with a fair and ethical perspective.
- We escalate and report allegations of misconduct and follow up to be sure that concerns are receiving appropriate action.
- We let each employee know that retaliation will not be tolerated, and they are free to speak up.

REPORT A CONCERN



2. SUCCESS BY SPEAKING UP



**Employees should speak up even if they don't have all the facts.
A good faith concern will be treated seriously, fairly, and promptly.
If a concern is confirmed, action will be taken.**

2.1 We Say Something if We See Something

We hold ourselves and our colleagues accountable to ensure integrity across the company. When we turn a blind eye to misconduct of others, it has a ripple effect, and creates a culture of mistrust. We encourage everyone to speak up and ask questions if and when they have a concern.

Learn More

- Whistleblower and Investigation Policy (*internal*)

2.2 We Don't Retaliate

We never engage in any form of harassment or negative action that is meant to silence or punish others for speaking up in good faith or participating in an investigation. Employees who observe or are the subject of retaliation should immediately report it to the Office of Ethics & Compliance.

Anyone who retaliates against another person for reporting a concern or participating in an investigation will be subject to disciplinary action, up to and including termination.



Employees Are Protected For:

- Refusing to take an action that would violate the Code, Coalfire policies, or the law, even if that refusal results in the loss of business to Coalfire.
- Raising a concern in good faith about potential misconduct.
- Cooperating with an investigation.

2.3 We Accept Consequences for Violating Our Code

We uphold our Code at Coalfire. When our Code is broken, there can be serious repercussions for Coalfire, including reputational damage, loss of business, and civil and criminal fines and penalties. Individuals may also face civil and criminal penalties, as well as, disciplinary action up to and including termination.

Any waiver of this Code that is granted to a Board of Director or a member of the executive team will be publicly disclosed as required by applicable laws, rules, and regulations.

2.4 We Handle Concerns with Respect

We empower our managers to serve a special role in the organization. Their responsibilities include listening and acting if a concern is raised. While they are empowered to address performance issues directly with Employees with the support of Human Resources (“HR”), concerns about business ethics or misconduct must be raised to the Office of Ethics & Compliance. Managers should not attempt to conduct any investigation on Coalfire’s behalf.

Additionally, managers are expected to prevent any retaliation against the person who made the report. Retaliation can take on various forms and can include, but are not limited to, raising performance concerns that were previously undocumented, withholding the individual from promotion or job opportunity, transferring an individual to a different department, or alienating an individual.

Managers can always contact HR or the Office of Ethics & Compliance at (Compliance@Coalfire.com) for advice.

How we secure our success...

- We clear our environment of distractions, thank the person for speaking up, and listening carefully.
- We respect each concern and take it seriously, even if we disagree.
- We protect the confidentiality of each person that reports a concern.

2.5 We Take Our Commitment to Investigations Seriously

We take all reports made to the Office of Ethics & Compliance of misconduct seriously and in confidence. Employees have the choice to remain anonymous. Providing a name assists with any required follow-up but is not required.

When a report is received, we will work to the best of our ability to understand the facts. Investigators will examine records, talk to witnesses, and allow all involved parties to provide information. Typically, we do not inform a manager that a direct report is part of an investigation. If a violation has occurred, we will inform the Employee’s manager, and we will take appropriate corrective or disciplinary action.

Employees may receive information about the outcome of the investigation if they make a report. However, confidential details about the investigation’s result or any Employee discipline will not be shared.

Employees must cooperate fully and honestly in any investigation conducted by the Office of Ethics & Compliance. No one will be punished in any way for speaking up in good faith.

2.6 We Report Concerns



Online: Coalfire.EthicsPoint.com



Email: Compliance@Coalfire.com



Phone: U.S. 844-715-9351
or
U.K. 0-808-196-5705



Mail: Attn: Compliance Team
Coalfire Systems, Inc.
330 N Wabash Ave, Suite 1430
Chicago, IL, 60611
United States of America



Additional resources for raising concerns:

- Employee's manager
- Any Coalfire manager
- HR
- Finance
- Legal



3. SUCCESS ACHIEVED TOGETHER

At Coalfire, leveraging our global population and taking advantage of our diversity of talents and thoughts is our promise to our Employees. Valuing the diversity of our people and ensuring a safe, inclusive, and respectful work environment fosters great trust, flexibility, creativity, and satisfaction within our company and community. Harassment in any form undermines equality and adversely impacts the dignity and well-being of Employees. It creates anxiety and stress for the impacted Employees and can result in widespread loss of productivity, low morale, absenteeism, staff turnover, and legal action. Coalfire has no tolerance for this conduct.

Learn More

- UK Employee Handbook (*internal*)
- US Employee Handbook (*internal*)
- UK Anti-Discrimination and Anti-Harassment Policy (*internal*)
- US Anti-Discrimination and Anti-Harassment Policy (*internal*)

3.1 We Take Workplace Safety Seriously

We prioritize the safety and security of our colleagues at Coalfire. We do our best to maintain a safe workplace and create a safe environment physically and behaviorally.



Examples of Behavior That Is Not Tolerated:

- Aggressive or hostile behavior that leads to emotional distress or fear of injury, including bullying.
- Threatening remarks, whether verbal assault or in writing.
- Possessing a weapon on company property, at company sponsored events, in company owned vehicles, or while on company business.
- Physical assault.

How we secure our success...

- We comply with all physical safety and health laws.
- We do not use alcohol, illegal substances, or anything that could impair our judgement while on the job.
- We behave in a way that respects the physical and emotional safety of others.
- We report unsafe or uncomfortable situations and all workplace accidents, injuries, and illnesses.

3.2 We Don't Allow Harassment and Bullying

We work to make Coalfire a place free of aggression, improper pressure, or intimidation. We ask Employees to recognize that our cultural and style differences may play a role in the perception of behaviors. It is expected that the aggrieved individual uses their best judgement to determine whether a behavior is either egregious or incessant despite requests to desist. If a behavior is either egregious or does not change despite requests, the incidents should be reported to HR.

Learn More

- UK Anti-Discrimination and Anti-Harassment Policy (*internal*)
- US Anti-Discrimination and Anti-Harassment Policy (*internal*)

3.3 We Don't Tolerate Sexual Harassment

We don't condone, nor tolerate sexual harassment of any form. Sexual harassment may involve unwelcome sexual comments or advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature that adversely affects an individual's employment opportunities, interferes with their performance, creates an intimidating or hostile environment, or any other characteristic protected by law. Sexual harassment violations will be subject to discipline, up and including termination.

Learn More

- UK Anti-Discrimination and Anti-Harassment Policy (*internal*)
- US Anti-Discrimination and Anti-Harassment Policy (*internal*)

3.4 We Encourage Diversity, Equity, and Inclusion

We know that diverse teams make better decisions. We work better together because of our differences, not despite them. We treat one another with dignity and respect, foster a culture of inclusion, and have no tolerance for discrimination.



Discrimination is the different or less favorable treatment of someone based on their race, religion, color, national origin, age, sex, sexual orientation, gender identity, marital status, physical or mental disability, veteran status, medication condition (including pregnancy), genetic information, or any other characteristic protected by applicable law.

How we secure our success...

- We value the individual characteristics of all colleagues.
- We treat others with respect and support differences.
- We are aware of unconscious biases.
- We make everyone feel a real sense of welcome and belonging.
- We make employment decisions using job-related factors, such as experience, and future business needs.
- We treat all employees and candidates fairly, regardless of their race, religion, color, national origin, age, sex, sexual orientation, gender identity, marital status, physical or mental disability, veteran status, medical condition (including pregnancy), genetic information, or any other characteristic protected by applicable law.
- We are committed to hiring people with disabilities and providing accommodations to qualified employees.

Learn More

- Diversity, Equity & Inclusion Spark Page (*internal*)
- EEO Policy (*internal*)

3.5 We Respect Employee Privacy

We include data protection as part of our mission and that includes the data of each of our Employees, contractors, Board of Directors, and affiliates. Personal data is only used and collected for approved, legitimate purposes and is accessible only to people who have a justified need to know. Coalfire has implemented appropriate privacy risk control measures and follow global privacy laws and requirements in the event of a data breach incident. Third parties processing our data must meet our data security and integrity expectations.



Employee personal data may include:

- Contact details, such as address or phone number.
- Medical information.
- Financial information.
- Employment history.
- Background check data.

Coalfire has established a Privacy Office that is focused on ensuring we have the right policies and procedures in place to protect personal data.

Learn More

- Privacy Program Spark Page (*internal*)

3.6 We Avoid Conflicts of Interest

We all have personal relationships, and we need to be careful when those personal relationships or financial interests overlap with our job responsibilities. Coalfire makes it a priority to address potential conflicts of interest carefully. Any conflict can impact decisions we make, erode trust within teams, and harm Coalfire's reputation.

How we secure our success...

- We act in the best interests of Coalfire.
- We avoid situations where a personal relationship or financial interest in another company might influence how we make decisions in our jobs.
- We understand that a potential conflict of interest can exist even if we believe our decisions will not be affected by the outside relationship.
- When conflicts of interest arise, we disclose them and get advice or approval.

Learn More

- Conflicts of Interest Policy (*internal*)

REPORT A CONCERN



4. SUCCESS WITH OUR COMPANY AND REPUTATION

4.1 We Safeguard Communications Equipment, Systems, and Assets

We each use Coalfire's communications equipment, systems, and services to perform our jobs and must safeguard them against cyber-related attacks, theft, loss, waste, and abuse. This includes equipment such as computers, laptops, telephones, copy machines, and mobile devices, as well as systems and services like voicemail, fax, mail room, intranet, Internet, e-mail, SMS/text, instant messaging, virtual meetings, online collaboration tools, and cloud data storage.

Additionally, we protect Coalfire's assets, ensuring they are used for legitimate business purposes and not for personal gain. Assets encompass cash, securities, physical property, supplies, services, business plans, client and Employee information, supplier information, intellectual property (software, collaboration tools, internet portal access, electronic subscriptions, and other items), as well as all other personal, proprietary, and confidential information.

Assets also include an Employee's time and the time of coworkers. Everyone is expected to use work time responsibly.



Employees must:

- Avoid carelessness, waste, and unauthorized use.
- Not misappropriate, misrepresent, or disclose Coalfire assets without authorization. Such acts may constitute a crime.
- Use Coalfire, client, supplier, and other third-party assets only for approved purposes and in compliance with applicable licenses, terms, and conditions.
- Disclose to HR the existence or rights or interests they have in any technology or invention that may relate to their employment with Coalfire, and where appropriate, assign such rights to Coalfire.
- Disclose and assign to Coalfire all interests in any technology, software, invention, improvement, discovery, know-how, design, copyright, or any product or creation an Employee, or a group including the Employee, made or conceived that arises out of, or in connection or relationship with, employment or assigned with Coalfire.
- Understand that if their relationship with Coalfire terminates for any reason, all rights to property, technology, and information generated or obtained as part of that relationship will remain exclusive property of Coalfire.

Learn More

- Information Security Plan (*internal*)
 - 2.3 Acceptable Use Policy

4.2 We Properly Handle Expense Management

We use good judgement when making expense-related decisions, whether spending Coalfire funds or approving expenses.



Employees must:

- Make sure transactions accurately reflect the expense incurred and are necessary to accomplish a business purpose.
- Never approve their own expenses.
- Ensure transactions are approved by an individual with proper authority and in a timely manner.
- Manage expenses against our clients' expectations where required.

Learn More

- Travel and Expense Policy (*internal*)
- Travel and Expense Policy FAQ (*internal*)

4.3 We Properly Manage Confidential Information

We hold personal, proprietary, and confidential information in the highest regard, recognizing its significance to our clients, colleagues, and company. It is our commitment to safeguard such information from unauthorized disclosure or misuse.

(a) Definition of Confidential Information:

Confidential information encompasses Personally Identifiable Information, Client Data, Proprietary Information and Non-Public Information. Personally Identifiable Information (PII), is data that directly or indirectly identifies individuals, including Coalfire clients, workforce members or their dependents, or job applicants. Client Data is information provided by clients that Coalfire is legally obliged to keep confidential, such as application and transaction details. Proprietary Information is information about assets owned by Coalfire or created by our workforce within the scope of employment, providing us with a competitive edge. Non-public Information is information that has not been previously disclosed to the general public and is otherwise not available to the general public. Further definitions of what encompasses confidential information may be contained within your employment documentation or other applicable policies.

(b) Scope of Confidential Information:

Confidential information extends to various forms, including written, oral, telephonic, or electronic communications.

(c) Handling and Protection:

All individuals associated with Coalfire are expected to treat any information received about Coalfire or its clients as confidential. We maintain robust processes and controls to govern the use, transmission, sharing, storage, and access to such information globally. Additionally, when engaging third-party service providers, we ensure they uphold the same standards of confidentiality and data protection.

(d) Obligations and Responsibilities:

Employees are obligated to keep confidential and safeguard Confidential Information acquired or created during their tenure with Coalfire, except as provided by applicable law. This obligation persists even after the cessation of employment. Failure to adhere to these responsibilities may result in disciplinary action.

(e) Compliance and Training:

We provide ongoing training and awareness programs to educate our workforce on the importance of confidentiality and their obligations under this policy. Compliance with these guidelines is subject to regular monitoring and review to ensure effectiveness and alignment with legal requirements.

By adhering to these confidentiality guidelines, we demonstrate our dedication to maintaining the trust and integrity vital to the success of Coalfire and its stakeholders.

Learn More

- Information Security Plan (*internal*)
 - 2.1: Information Classification and Handling
- Privacy Program Spark Page (*internal*)

4.4 We Maintain Accurate Records and Contracts

We create business records with everything we do. We create, retain, and dispose of documents, business records, and information assets (paper and electronic) as part of our daily business. For business, accounting and legal reasons, our company records must be properly preserved or destroyed at a certain time. However, we never destroy or dispose of information that might be needed for an investigation, an audit, or a legal proceeding. Employees who receive a legal hold notice must follow the guidelines in the notification.



Employees must:

- Create, identify, manage, retain, and dispose of Coalfire's information, records and data in line with the Information Classification and Handling Policy.
- Maintain records in sufficient detail to accurately record all transactions and to satisfy all business purposes.
- Follow the standards set forth in the Information Classification and Handling Policy when creating business records and documents including those that might be viewed, used, or retained by Coalfire or a third party. Do not destroy or alter any record that is potentially relevant to a pending, threatened, or foreseeable investigation (internal or external), legal claim, or government investigation or proceeding.
- Follow all legal hold directives communicated by Legal, Tax, Internal Audit, or any other control function.

Learn More

- Contracts and Signature Policy (*internal*)
- Information Security Plan (*internal*)
 - Appendix A: Data Retention Schedule
 - Appendix B: Litigation Hold Policy and Procedures

4.5 We Use Social Media Responsibly

We recognize that social media is a popular and powerful communication tool in our daily lives that must be used responsibly.



Employees must:

- Remember that social media platforms, despite privacy settings, are essentially public forums.
- Comply with all applicable Coalfire policies, guidelines, and any applicable legal and regulatory requirements.
- Only post content on behalf of Coalfire on social media if they are authorized to do so and in accordance with applicable terms and conditions governing both internal and external sites.
- Ensure personal use of social media does not interfere with work and is consistent with Coalfire's values and standards.
- Not disclose any nonpublic, proprietary, or confidential information.
- Refrain from harassment, discriminatory, or retaliatory actions of any kind.

Learn More

- Social Media Guidelines (*internal*)

4.6 We Use Coalfire's Brand Appropriately

We use Coalfire's name, logo, trademarks, facilities, and relationships only to further Coalfire's strategic objectives.



Employees must:

- Never use Coalfire's name, logo, trademarks, facilities, or relationships for commercial purposes unrelated to their Coalfire job.
- Only use them for charitable or pro bono purposes with prior approval from leadership and only after completing any other notification or approval requirements of the business, region, and/or function.

Learn More

- Corporate Branding Box Folder (*internal*)

4.7 We Don't Respond to Media Inquiries Independently

We recognize Coalfire is a high-profile company, and employees may be approached by reporters and other influencers for public-facing comments. To ensure that we speak with one voice and align with our External Communications Policy (*internal*), employees should direct all media inquiries to the Marketing Department. Coalfire employees are expected to follow the External Communications Policy (*internal*). No one may issue a press release or speak as a company representative without first consulting with Coalfire's corporate marketing staff.

Learn More

- External Communications Policy (*internal*)

REPORT A CONCERN



5. SUCCESS WITH OUR CLIENTS

Making good choices builds confidence in our products, services, and overall brand. Our clients and potential clients are important to everything we do at Coalfire. We make it a priority to live our values and follow our Code to show our clients that they have made a good choice when they choose a partner with Coalfire.

5.1 We Keep Accurate Client Records

We create business records as part of our services with clients. We have a responsibility to ensure they are accurate, up to date, truthful, and complete. It is a violation of this Code and our company policies to intentionally omit, hide, or disguise information when creating these records. Keeping accurate records is not just about creating documents—it is also about managing them. We must know and follow Coalfire’s internal controls and policies about records management, including maintaining, retaining, and correctly disposing of records. If you are asked for records or information from a client, you have a responsibility to be transparent and provide full and complete information.

Learn More

- Time Entry Policy (*internal*)
- Information Security Plan (*internal*)
 - Appendix A: Data Retention Schedule

5.2 We Prioritize Privacy

We can be successful only if our clients trust how we handle their data and any information we collect about them. Keeping client data confidential is also a benefit to Coalfire, as we continue to serve our clients year after year and retain their loyalty. It is critical to Coalfire’s business that all client data is kept confidential and handled according to relevant laws and guidelines.



Client personal data relates to the personal data of people working for our client and partners, which may include information, such as:

- Business contact details, such as, name, title, address, email, and phone number.
- Marketing information, such as participation in conferences, seminars, webinars, and logs of visits to websites and other social media, through cookies or otherwise.

How we secure our success...

- We follow local privacy and data protection laws.
- We provide clear and accurate privacy notices when collecting or processing personal data.
- We honor privacy choices by using computer data to provide only the services clients have agreed to.
- We protect our clients’ data by building secure products and services.

Learn More

- Information Security Plan (*internal*)
 - 2.1: Information Classification and Handling
- Privacy Program Spark Page (*internal*)
- [Coalfire's Privacy Policy](#)

5.3 We Don't Bribe or Take Kickbacks

We believe in our products and services at Coalfire, and we do not use improper payments to influence the decisions of our clients and partners. Corruption harms our clients in many ways, including sometimes causing them to pay more than they should. Gaining and maintaining clients' trust every day is more important than any benefit we might get from a certain transaction. In some parts of the world, paying a bribe to get business may be something that is accepted, but we don't do it. Bribes, kickbacks, or other improper benefits are not how we show our clients their value to Coalfire.

How we secure our success...

- We refuse to offer or pay bribes or kickbacks to anyone.
- We prohibit corrupt payments of all kinds, including payments to secure permits or approvals, and small payments to speed up a routine government process (often known as a "facilitating payment").
- We avoid hidden terms or arrangements and reduce complexity wherever possible in any deal, because transparent transactions reduce the risk of a bribe or kickback.
- We use partners that have a reputation for integrity, and we report signs that a representative is unethical or could be paying a bribe.
- We don't let trade partners influence our buying decisions and chose to partner with suppliers that best benefit our clients.
- We make sure that any gifts, hospitality, or travel we offer to government officials or clients are reasonable and appropriate, and pre-approved where necessary.
- We hire candidates based on their merits, and do not make hiring decisions to benefit a client or government official.
- We, if we chose to, make charitable donations to support a legitimate charitable cause, not as part of an exchange of favors.

Learn More

- Anti-Bribery and Corruption Policy (*internal*)
- Anti-Bribery and Corruption Policy Guidance (*internal*)

5.4 We Support Fair Competition

We compete with integrity at Coalfire. We believe that healthy competition and fair dealing creates a better market for our clients. They have choices from a variety of products and services at fair prices. Our channel partners are separate and independent entities, so we may not and do not set their resale prices or control their business operations. We respect and abide by laws governing fair competition when dealing with our distributors, resellers, systems integrators, and other value-added partners. Employees with questions or concerns about how to ensure fair competition should contact the Office of Ethics & Compliance.

How we secure our success...

- We do not make official or unofficial agreements with competitors that limit competition.
- We do not interfere with bidding processes or help anyone else do so.
- We do not set prices for our channel partners.
- We use appropriate sources, are truthful, and do not misrepresent who we are when gathering competitive intelligence.

Learn More

- Antitrust Policy (*internal*)
- Anti-Bribery and Corruption Policy (*internal*)
- Anti-Bribery and Corruption Policy Guidance (*internal*)

REPORT A CONCERN



6. SUCCESS WITH OUR GLOBAL COMMUNITY

The hallmark of an ethical company is when governments and communities know that we will follow the laws and customs of the countries where we do business and impact the workforce. This includes being an advocate for human rights around the world.

6.1 We Respect the Laws of All Countries

We are privileged to have clients and Employees in many different countries. We openly respect the laws wherever we do business and wherever we employ citizens. This helps us to build trust with governments, strengthen the communities where we live and work, and contribute to a fair society where we enjoy the protection of these same laws.

How we secure our success...

- We follow the laws and regulations of the U.S. and of all the places where we operate.
- We are honest and transparent in our discussions with government representatives and officials.
- We respond truthfully, appropriately, and promptly to government inquiries and requests for information.
- We comply with global trade controls and economic sanctions that prohibit us from doing business with certain countries, governments, entities, and individuals.

6.2 We Comply with Global Trade Compliance Laws

We comply and educate our colleagues about import and export laws and regulations to ensure that our products, software, services, and technology (including source code) are not transferred to any sanctioned countries or to any denied parties.

Learn More

- Trade Compliance Policy (*internal*)
- Trade Compliance Policy Guidance (*internal*)

6.3 We Use AI Responsibly

We use Artificial Intelligence ("AI") in a way that aligns with our company mission, values, and our commitment to human rights. We take into consideration safety, privacy, transparency, diversity, and responsibility when using in our business activities or developing and deploying AI technologies into our products and services. AI will never be used without human supervision of those who have sufficient knowledge about the subject about which the system makes decisions.

Learn More

- Artificial Intelligence Use Policy (*internal*)
- Artificial Intelligence Spark Page (*internal*)

6.4 We Advocate for Human Rights

We are committed to respecting and promoting human rights to ensure that technology plays a positive role across the globe. Coalfire promotes equal opportunity in its hiring practices, makes recruiting decisions based solely on job-related criteria, and does not use forced labor.

How we secure our success...

- We believe that we can more effectively advance human rights through our presence in, rather than absence from, countries with significant human rights challenge.
- We advocate for the rule of law and human rights, including consideration of international laws or norms.
- We respect the rights to freedom of expression and privacy on all our online services.
- We verify whether the government demands are valid, binding, and otherwise comply with the rule of law when we face requirements from governments to provide user data or remove content.

Learn More

- Human Trafficking Policy (*internal*)

6.5 We Carefully Participate in Political Activities

At Coalfire, we believe in fostering an open and robust political process for a fair, efficient, and productive society. While we respect and support our Employees' right to engage in political activities during their personal time, it is crucial to maintain a clear separation between our professional and personal pursuits. We emphasize that participation in political causes or PACs is entirely voluntary, and Employees should refrain from implying or acting on behalf of Coalfire in any political context. It is our policy to avoid direct or indirect pressure on Employees to contribute politically or support any party, candidacy, or cause. We strive to uphold a workplace environment that values individual perspectives while ensuring that our collective actions do not misrepresent the stance of Coalfire on personal political matters.

How we secure our success...

- We make it clear that our political views and actions are our own and not those of the company.
- We do not participate in political activities on company time or using company resources.
- We do not circulate or display materials of a political nature in any facility occupied by Coalfire.

REPORT A CONCERN



7. SUCCESS WITH OUR PARTNERS

Being part of a global ecosystem means we adhere to high ethical standards, and we expect the same for anyone who represents Coalfire's business, whether they are a subcontractor, supplier, consultant, or play another role in our business activity. We do not ask our representatives to take any action that we would not take ourselves.

7.1 We Select Trusted Partners

We rely on a global network of partners, representatives, and vendors to make our business successful. For that reason, we are careful in who we choose to partner with and represent the Coalfire name and business. Clients will not see them as separate from Coalfire, so we must review and select these representatives carefully to protect our reputation and protect our Employees and clients from unintended harm.

How we secure our success...

- We know our representatives by doing thorough checks.
- We include a particular representative in a deal or transaction only when appropriate.
- We do not ask representatives to take unethical or unlawful actions.
- We do not accept orders from partners if there is not a corresponding end user order.
- We report concerns of unethical or unlawful behavior by a representative or partner.

7.2 We Select Trusted Suppliers

We rely on our supplier relationships for the continuity of our business and mission. To achieve success, our supplier must be as committed as we are to ethics and integrity.

How we secure our success...

- We do not tolerate or support suppliers who engage in child labor, human trafficking, and other labor abuses in our supply chain.

Learn More

- Procurement Spark Page (*internal*)
- [Coalfire's Supplier Code of Conduct](#)

7.3 We Adhere to Appropriate Gifts, Hospitality, & Travel Choices

We make good choices when exchanging business courtesies with third parties. Giving and receiving gifts, providing hospitality and travel to valid business events can build strong working relationships and goodwill between Coalfire and those with whom we do business. Gifts, meals, or trips that are extravagant or lack transparency or a legitimate purpose may be viewed as bribes or as simply inappropriate. These items can erode trust and harm our business.

How we secure our success...

- We make sure gifts, hospitality, or travel we offer or accept are reasonable, appropriate, and have a legitimate business purpose.
- We never give or accept cash.
- We do not solicit gifts, hospitality, or travel from third parties, or put them in a position where they feel obligated to provide something in order to do business with us.

Learn More

- Anti-Bribery and Corruption Policy (*internal*)
- Anti-Bribery and Corruption Policy Guidance (*internal*)
- Travel & Expense Policy (*internal*)

REPORT A CONCERN



8. SUCCESS WITH OUR INVESTORS AND THE PUBLIC

Our investors and financial supporters must have confidence that we will create value for them in an ethical and lawful way. It is a priority that we do not use confidential information to support misconduct in the media and trading markets, that we keep accurate records, and that we protect our intellectual property and other valuable assets to keep Coalfire successful.

8.1 We DON'T Trade on Inside Information

We are wholly owned by the private equity firm Apax. We maintain trust with our investors and the public by respecting financial laws, which means we do not trade based on material nonpublic information. In our work, we may become aware of material, nonpublic information about Coalfire, other Apax portfolio companies, and companies with whom we do business.

- Information is “material” if a reasonable investor would consider it important in deciding whether to buy or sell that company’s securities.
- Information is “nonpublic” if it has not been broadly communicated to the investing public.

Trading Apax stock or the stock of any other company based on this information not only breaks trust with our investors and the public, but is also illegal, violates company policy, and is unfair to other investors.

How we secure our success...

- We never buy or sell any securities based on material, nonpublic information.
- We do not give someone else (for example, a friend, a spouse, or a broker) a “tip” regarding material, nonpublic information.
- We do not recommend or suggest that anyone else trade in the securities of any company based on material nonpublic information, even if we are not sharing the information itself.
- We consult with the Office of Ethics & Compliance before buying or selling public securities where we have questions as to whether we may be in possession of material nonpublic information.

8.2 We Protect Intellectual Property

We protect and respect the value of data and ideas, whether they belong to Coalfire or a third party. We lose our competitive advantage if we disclose Coalfire's intellectual property (IP). We lose trust if we disclose someone else's IP. Protecting IP and ideas is vital to our success and builds our reputation as a trustworthy global business partner.

How we secure our success...

- We preserve Coalfire's own intellectual property rights through copyrights, trademarks, and other forms of intellectual property that protect that value of our innovation.
- We respect the confidentiality and intellectual property rights of others, and do not use others' confidential information without authorization.
- We do not use or copy third-party copyrighted materials, like software, graphics, videos, and music, without a license or permission from Legal.

8.3 We are Careful on Social Media

We all use social media to connect with family, friends, and the broader online world. Employees must refrain from publicizing competitive or confidential information and be careful of their words, tone, and social media engagement as that can be a reflection of Coalfire.

How we secure our success...

- We reshare corporate social posts that showcase positive company momentum and our industry thought leadership as well as current job openings.
- We post job alerts and re-posts of public blogs as part of our social media communications about Coalfire to share our news.
- We don't share confidential or personal information about Coalfire or our clients, partners, or vendors on any social media outlet.
- We represent ourselves with honesty and integrity in our personal and professional social media communications.

Learn More

- UK Employee Handbook (*internal*)
- US Employee Handbook (*internal*)
- Social Media Guidelines (*internal*)
- Corporate Branding Box Folder (*internal*)

REPORT A CONCERN



9. SUCCESS WITH OUR CODE

We are committed to following the rules at Coalfire and hold mandatory trainings to educate Employees on following relevant laws and regulations. The Ethics & Compliance Committee is responsible for administering the Code in an independent, objective, and consistent manner. Our Code of Conduct and Ethics Program are important to our success and value in the marketplace and are supported by the Board of Directors. Only the Board of Directors can change the rules for a director or top executive. If they do, we'll publicly disclose if required by applicable law.

Violation of this Code may result in disciplinary action, up to and including termination of employment. We trust our team to use common sense and do the right thing, even if there's no specific rule against it.

Employees are advised to speak up if they see something wrong so that we can fix it.

9.1 We Are All Responsible

We are all responsible for upholding this Code, Coalfire policies, and the law. **This means Employees must:**



Read, understand, and comply with this Code, and the policies, laws, and regulations that apply to their job.



Speak up when they see possible violations of the Code, Coalfire policies, and legal and regulatory requirements.



Be truthful and cooperate fully in any internal investigations. Do not conceal or destroy information.



Complete training on the Code, and attest that they understand and commit to comply with the Code. Failing to read or attest to the Code does not excuse them from these responsibilities.

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