



## Code of Business Conduct and Ethics

### 1. Introduction.

The RSA Code of Conduct (the “Code”) provides guidance on how to carry out daily activities across RSA Security LLC and affiliates (“RSA”) in accordance with our culture and values, as well as in compliance with the letter and spirit of all applicable laws.

All employees must adhere to the RSA’s Code, and the policies and standards which flow from our Code. This includes officers, directors and employees of RSA. Failure to do so may result in disciplinary action, up to and including termination, in accordance with local law. Employees must be familiar with the Code and the policies and standards that apply to their role. Of course, our Code and policies can’t address every possible situation, so it is up to employees to use good judgment and seek help whenever they have questions or aren’t sure about the right course of action. We also expect our contingent workers, agents and all others acting on behalf of RSA to hold themselves to equally high standards.

Our Code is a global Code. RSA is based in the United States and thus must adhere to all laws applicable to U.S. based corporations. We proudly employ team members and serve customers all over the world. As a result, we must comply with both U.S. laws and the laws of all other countries where we do business. In those rare circumstances where it appears that local law may conflict with U.S. law contact the Legal Department or Ethics for guidance.

Our Code sets one consistent global standard. While we respect cultural differences, if a local custom or business practice violates our Code, we must follow the Code. At the same time, if something permitted or required by our Code violates local law, we must follow local law. Ultimately, we all adhere to one global standard: we win with integrity.

### 2. Commitment.

We all need to show commitment to our culture and values by acknowledging that we’ve read, understand and agree to abide by the Code. We are required to do this when we are hired and to renew this commitment annually. Please note, the Code is not a contract of employment, and RSA may interpret, modify or rescind some or all of the Code provisions, as well as related policies and standards, at any time.

### 3. Speaking Up.

RSA encourages employees and third parties to speak up and report concerns if someone is behaving illegally or unethically. Employees can talk to their leaders, submit an online report via email to [ethics@rsa.com](mailto:ethics@rsa.com) or report anonymously (where allowed by law) to [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). Additionally, RSA does not tolerate retaliation against anyone who initiates or participates in the Ethics

process, asks questions or raises concerns in good faith.

#### **4. RSA Leaders.**

Being a people manager at RSA comes with responsibilities. Managers have a special responsibility to lead with integrity. It is not enough for a manager to behave legally and ethically they must also take affirmative steps to influence their team members to do the same.

To satisfy this requirement, managers must be vocal and make a visible commitment to integrity. They must not only adhere to the law, the RSA Code, and policies and standards, but they must promote adherence and ethical behavior among their team members. This means they must:

- Be a positive role model. Actions speak louder than words, so let actions demonstrate the belief that although business goals are important, they can never be achieved at the cost of compliance with legal requirements and ethical principles. We can do both — we can win with integrity.
- Set the right tone. Be comfortable talking with team members about the importance of acting legally and ethically. Explain how our Code supports our purpose and values and ensures our success. Find opportunities to review important concepts during team meetings.
- Thoughtfully complete ethics and compliance training in a timely manner, and make sure team members do the same.
- Become familiar with the Code, policies and standards that apply to the organization. Adopt and follow compliance processes designed to ensure compliance.
- Celebrate achievement. Recognize and reward team members whose behavior exemplifies our value of integrity.
- Create an environment where team members know they can ask questions or raise concerns without fear of reprisal. Be available to answer team members' questions and address their concerns. Never retaliate against anyone who reports a good faith concern or cooperates with internal investigations or audits. And don't tolerate others who do.
- Provide appropriate supervision to ensure compliance with the Code. Report any behavior that is illegal or violates RSA's Code, policies or standards.

#### **5. Customers.**

RSA customers and broader stakeholders are the reasons we exist and they rely on us to listen and provide solutions that will help them succeed. They expect us to operate with the highest ethical standards. To earn and maintain their trust, we are committed to doing business fairly, honestly, legally and ethically wherever we operate in the world.

#### **6. Privacy.**

Virtually every country regulates the collection, use, storage, disclosure, deletion and international movement of personal information. When accessing or handling personal information, RSA must comply with applicable laws and regulations, contractual obligations, the RSA Code policies and voluntarily-adopted standards for protecting individuals' personal information.

RSA is intentional and careful with personal information. We use only responsible and lawful means to access, collect, use, share, transfer or store the personal information of others, and use personal information solely for legitimate business. Please visit our RSA Privacy Statement currently available at <https://www.rsa.com> for more information about RSA privacy practices.

RSA business partners must share our commitment to protecting and appropriately using personal information. Before sharing personal information with any business partner, be sure the partner has executed the appropriate contracts, memorializing their commitment to following the law and adhering to RSA's policies and standards.

For more information regarding working with our channel partners, see RSA's Partner Code of Conduct currently available at <https://www.rsa.com/content/dam/en/terms/rsa-partner-program-code-of-conduct.pdf> for additional provisions on protecting and securing customer and team member personal information.

## **7. Quality, Safety and Security in our Solutions.**

RSA focuses on earning our customers' trust and loyalty by:

- Listening to, learning from and responding to our customers
- Delivering products, services and solutions that consistently meet expectations for quality, value and customer experience
- Driving continual process, product and service improvements
- Measuring customer satisfaction, trust and loyalty

We are committed to compliance with the laws and regulations in each country into which our products are shipped. Our products are designed and tested to meet or exceed the appropriate worldwide standards. RSA complies with applicable environmental regulations and laws, and takes every opportunity to minimize harmful impacts on our planet. In addition to meeting all applicable legal and regulatory requirements, RSA strives to have safe products that are secure and dependable.

## **8. Unfair Competition.**

Virtually all countries have laws prohibiting or regulating transactions and relationships that could have the purpose or effect of limiting competition. RSA knows it must compete fairly and vigorously and in full compliance with these laws. Any violation of these laws may result in discipline and could result in civil or criminal penalties. RSA believes that a free and competitive marketing serves our customers best.

## **9. Pricing and Contracting.**

RSA has established policies, standards, and procedures and controls to govern the negotiation and approval of contracts. RSA ensures compliance with legal, accounting, and financial reporting requirements, and protects RSA's assets from fraud, waste and abuse, by having established policies in place that govern the negotiation and approval of contracts between RSA and its customers, suppliers,

business partners, and other stakeholders.

Authority to enter into or sign contracts on behalf of RSA has been delegated to certain team members depending on the nature, scope, and financial value of the contract involved.

#### **10. Government Contract Regulations.**

RSA understands that contracts with government customers, or commercial transactions financed in whole or in part with public funds, have additional requirements. We secure business the right way: Information submitted in connection with bids or tenders for government contracts must be current, accurate and complete.

RSA will not offer bribes, kickbacks or preferential treatment in connection with a government contract. With limited exceptions (which must be pre-approved in writing by the Legal Department), we are also prohibited from providing anything of monetary value to government employees or their family members. This includes gifts, hospitality, travel, lodging, services, discounts and meals.

#### **11. Diversity, Equal Opportunity, and Respect.**

RSA is committed to diversity, equality, and providing a safe and productive environment that fosters open dialogue and the free expression of ideas, free of harassment, discrimination and hostile conduct. We recognize a shared responsibility to create and maintain that environment for the benefit of all.

We promote equal opportunities and fair treatment for all team members, customers, business partners and other stakeholders, regardless of race, color, religion or belief, creed, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, HIV Status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, protected veteran status, citizenship status when otherwise legally able to work or any other status protected by the laws or regulations in the locations where we operate. We provide equal employment opportunity to everyone who is legally authorized to work in the applicable country and we provide reasonable accommodations to individuals with disabilities.

All team members are expected to report suspected discrimination promptly and never retaliate against anyone who raises a good faith concern that unlawful discrimination has occurred. Our commitment to these principles is essential to our success.

#### **12. Anti-Harassment.**

RSA team members should be able to do their jobs in a safe and respectful environment without fear of harassment. Harassment is prohibited and will not be tolerated.

Harassment can include actions, language, written materials or objects that are directed or used in a way that undermines or interferes with a person's work performance, or creates an intimidating, hostile or offensive work environment. We never target anyone for negative treatment on the basis of race, color, religion or belief, creed, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, HIV Status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic

information, family or parental status, protected veteran status, citizenship status when otherwise legally able to work or any other status protected by the laws or regulations in the locations where we operate.

All forms of harassing conduct are prohibited at RSA, including without limitation:

- unwanted sexual advances, invitations or comments;
- visual displays such as derogatory or sexually-oriented pictures or gestures;
- physical conduct including assault or unwanted touching; or
- threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences.

All team members are expected to report suspected harassing conduct promptly and never retaliate against anyone who raises a good faith concern that unlawful harassment has occurred.

### **13. Human Rights.**

RSA respects the fundamental human rights of all persons in our value chain. We strive to ensure respect for human rights of all team members, as well as people outside of our organization who are impacted by our value chain, such as workers in our supply chain or business partners.

If employees or third parties suspect their (or another's) rights are at risk, or are being asked to conduct business in a way that could violate another person's fundamental human rights, we encourage employees to Speak Up.

### **14. Environmental Health & Safety (EHS).**

RSA team members are expected to perform their work in full compliance with all applicable health, safety, and environmental laws and regulations. The requirement applies whether the employee is working at an RSA site, a customer site, or a remote location. Additionally, alcohol, illegal drugs and controlled substances can adversely affect safety, productivity, attitude, reliability and judgment. With the exception of lawful, moderate and prudent alcohol consumption during legitimate business entertainment, employees are prohibited from consuming or being under the influence of alcohol, or possessing, distributing or being under the influence of illegal drugs while engaging in RSA business.

RSA employees must report all accidents, injuries, unsafe work conditions, releases to the environment and other EHS concerns immediately to their supervisor, and to others as described in the applicable procedures. If they hire and/or procure contractor or business partner work, they must ensure that each contractor and partner have an EHS program appropriate to the type of work to be performed, is made aware of other potential hazards in the work area, and follows RSA's contractor safety and environmental requirements. If an employee is working at customer or supplier/partner locations, they must follow the stricter of RSA's or the customer or supplier/partner's EHS requirements.

### **15. Workplace Violence.**

A workplace free of violence, weapons, and other disruptive behavior keeps team members safe.

A non-violent workplace starts with being polite and respectful at all times. If employees disagree with a

team member or other person at work, they are encouraged to resolve it calmly. Never bully, threaten, intimidate or harm another person or their property through verbal behavior (written or oral) or non-verbal behavior (such as gestures or expressions).

Unless authorized by law or RSA policy, employees may not possess, conceal or use weapons, including firearms, knives, clubs, ammunition, explosives or other devices that are primarily used to inflict injury (including recreational weapons such as hunting rifles or crossbows, toy weapons or replicas that can easily be viewed by most people to be real or authentic) while on RSA property or when conducting RSA business. This prohibition does not apply to knives or other tools which are required, permitted or provided by RSA as part of their job assignment.

This policy applies to anyone who enters RSA property, which includes buildings, parking lots, walkways and any other property we own, lease or occupy.

#### **16. Safeguarding Confidential Information.**

Team members may not unlawfully acquire or misuse the trade secrets or other confidential or proprietary information of any third party.

#### **17. Sustainable Approach.**

Environmental responsibility is about incorporating sustainability into every aspect of what we do. RSA is committed to driving human progress by putting our technology and expertise to work where it can do the most good for people and the planet. It's simply not enough to do "less bad." We see technology as the key to unlocking regenerative solutions — ones that put more back into society, the environment and the global economy than they take out. Help us uphold this commitment by incorporating sustainable thinking into every aspect of what they do. This means working to design products that utilize energy more efficiently, are made from more preferable materials or are easier to safely recycle and recover materials from at the end of their useful life. It also means streamlining our operations to minimize resource use.

Environmental responsibility is about more than creating an eco-friendly product or initiative. We partner with customers using our technology and expertise to innovate sustainable solutions that benefit our communities and the planet. We encourage employees to engage in actions that promote the health of the planet.

#### **18. Financial Integrity.**

Our financial statements must always honestly and accurately reflect our financial and operational performance. The integrity of our financial statements and other regulatory filings is critical to the successful operation of our business, and to maintaining the confidence and trust of our shareholders, customers, business partners and other stakeholders.

RSA does not misrepresent financial or operational performance or otherwise knowingly compromise the integrity of the company's financial statements. We do not enter information in the company's books or records that intentionally hides, misleads or disguises the true nature of any financial or non-financial transaction, result or balance, nor do we enter into any unauthorized agreements or allow any activity

that could lead to that result. We follow all processes and controls designed to ensure the accuracy of RSA's assessment and reporting of its financial results.

#### **19. Insider Trading.**

Using material non-public information for personal financial gain, or sharing it with others for their financial gain, is prohibited by company policy and potentially illegal. Employees should never use or disclose material non-public information prior to its official public release.

#### **20. Anti-Bribery and Anti-Corruption.**

RSA earns business because we have the best products and solutions anywhere. We don't win business by bribing anyone, ever. Don't accept a bribe from anyone, ever. A bribe is anything of value — such as cash, hospitality, travel, gifts, loans, charitable donations or job opportunities — offered for an improper purpose or in order to win or keep business. RSA is committed to winning business only on the merits and integrity of its products and solutions. We do not tolerate bribery or corruption, regardless of where we are located or where we do business. Bribery and corruption are forbidden with respect to both public and private entities, both by this Code and RSA policies and standards but also, in some countries, by law.

Regardless of local practices or competitive intensity, employees must avoid all activity which could constitute bribery or corruption or could give the appearance of bribery or corruption. This is particularly the case with employees and officials of governments, state-owned or controlled entities, political parties, and international organizations. Although employees must pay particular attention when dealing with public entities and their employees, many anti-corruption laws — and this Code and RSA policies and standards — cover private entities and employees as well.

Complex rules govern the giving of gifts, hospitality and other business courtesies to government officials and employees of governmental or quasi-governmental entities. What may be permissible for commercial customers may be illegal when dealing with the government. All payments, disbursements, rebates, marketing development funds, discounts, credits or other exchanges of currency to a customer or third party must be for legitimate business purposes.

We comply with the anti-bribery and anti-corruption laws of the countries in which we do business, and the U.S. Foreign Corrupt Practices Act (FCPA) as RSA is based in the United States. These laws apply to the actions of our company, our team members and third parties who work on our behalf anywhere in the world.

#### **21. Trade Law Compliance.**

RSA operates all over the world and complies with applicable laws regarding the import or export of goods, services, software and technologies, including U.S. economic and trade sanctions laws and regulations, in every country in which RSA conducts business.

Trade laws provide that we cannot:

- export products, services, technology or software, or engage in prohibited sales to embargoed countries or to entities associated to those countries such as embassies or banks — even if the entity is located outside the embargoed country;
- provide our products for prohibited end-uses (such as terrorist activities, missile technology and

- proliferation of nuclear, chemical or biological weapons);
- provide our products to prohibited end-users (such as parties subject to comprehensive OFAC sanctions); or
- ship, transfer or release products, technology or software requiring an export license without obtaining the appropriate authorization.

When importing, we must exercise reasonable care in all customs matters to ensure that we accurately classify, value, determine country of origin and specify all facts reportable to customs authorities. We expect our partners to demonstrate this same commitment.

## **22. Theft and Fraud.**

RSA will not tolerate theft and fraud. We all know that theft is taking something that doesn't belong to you without permission. It can include physically taking something like money or property, or it can be done through other means like forgery, embezzlement or fraud. Fraud is a type of theft by deception. It is making someone believe (by words or conduct or by concealing important information) something that isn't true, with the intent of having them take (or refrain from taking) some action that results in them suffering economic harm.

## **23. Money Laundering and Terrorist Funding.**

RSA takes steps to prevent illegal use of its business activities for money laundering and terrorist financing by identifying our customers, their business activity and the origin of their funds, and by reporting suspicious transactions. We abide by all applicable laws designed to deter criminal enterprise, and protect the national security of the countries where we do business.

## **24. Conflicts of Interest.**

RSA requires its employees avoid any activity or personal interest that creates or appears to create a conflict between their interests and the interests of RSA or that might impair, or appear to impair, their ability to perform work objectively and effectively.

## **25. Gifts and Hospitality.**

Gifts and hospitality must be given and received in a responsible manner and may never be used to influence a business decision.

Reasonable gifts, hospitality and other business courtesies may be appropriate to foster goodwill but should never be used to influence a customer's business decision or undermine the integrity of our business relationships.

### **Accepting Gifts:**

Although nominal gifts and business courtesies (but never cash or cash equivalents) are acceptable under certain limited circumstances, RSA will not solicit or accept tangible or intangible personal benefits of any kind that are given — expressly or implied — in exchange for securing RSA business or providing favorable business terms. We will not accept gifts or hospitality that are illegal, immoral or would reflect negatively on RSA.

### **Giving Gifts:**



Gifts may only be given as appropriate business courtesies to enhance relationships and never to inappropriately influence business decisions. When appropriate to give gifts, employees should only offer gifts and hospitality to partners, customers or other third parties for legitimate business purposes and when the gift, hospitality or business courtesy is reasonable in amount, in good taste and in accordance with RSA's Global Gifts and Hospitality Policy. Gifts, hospitality and business courtesies may never be in the form of cash or cash equivalents and may only be given to those individuals who are permitted to accept the gift under the laws and policies applicable to them.

More restrictive rules often apply when giving gifts to certain types of customers, like officials or employees of governmental or quasi-governmental entities which can include certain healthcare, utility or education customers. Employees must always follow the most restrictive rules applicable and reach out to local legal when in doubt.

## **26. Ethics Investigations.**

RSA takes ethics investigations seriously. All investigations and any resulting corrective action will be conducted in compliance with applicable local law and applicable RSA policies and standards. Ethics is responsible for overseeing internal investigations into suspected ethics and compliance-related misconduct, under this Code and related policies and standards. Employees must not interfere in internal investigations or engage in their own fact-finding. Rather, they should promptly raise ethics and compliance questions and cooperate fully in any company authorized internal investigation.

All investigations and any resulting corrective action will be conducted in compliance with local law, applicable RSA policies and standards and any required workers' representative consultation requirements. Employees are expected to cooperate in internal investigations, audits, accounting reviews or directions from RSA's lawyers in connection with lawsuits or government proceedings.

RSA takes all reasonable efforts to keep information related to an investigation confidential and the employee must keep investigation information confidential and not share such information beyond the investigation team unless specifically authorized in writing. Retaliating against any RSA team member for reporting an ethics issue or participation in an authorized company investigation is strictly prohibited and will not be tolerated.

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