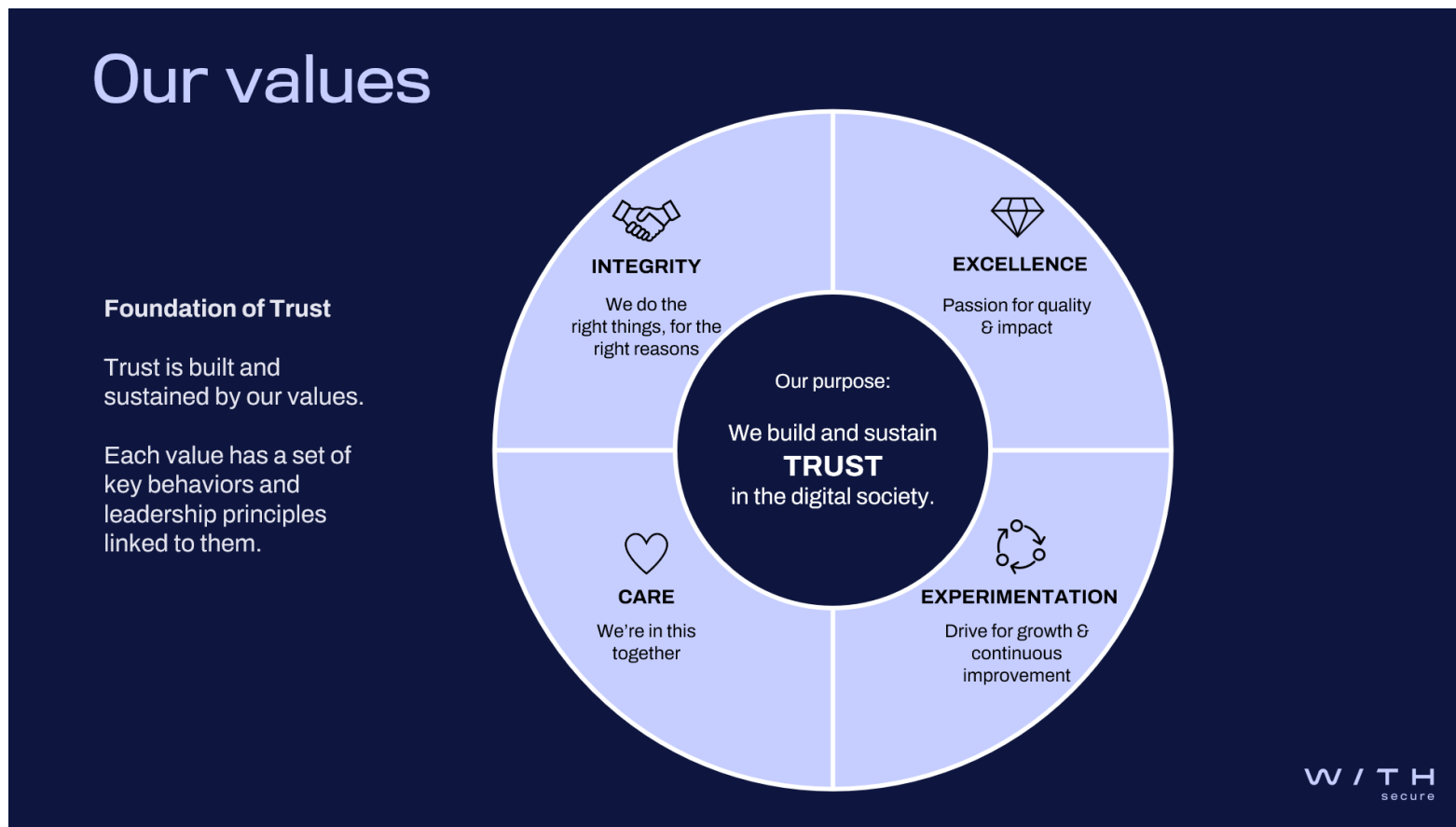


# WithSecure™ Code of Conduct

2022

# WithSecure™ purpose and values

The Code of Conduct should be read and understood in the context of WithSecure's Purpose and Values – they guide our personal behaviour in all situations.



“ WithSecure™ exists to build trust in society and to keep people and businesses safe. As a cyber security company, we secure the world around us. Trust ensures we will succeed in our mission. Trust is earned when action matches words.

At WithSecure™, we want to do what is right. We foster business culture that supports the highest standards of ethical conduct. By always doing the right thing, we can all be proud of the work we do and about the company we work at.

We make decisions every day that impact our trustworthiness. For these choices, it is extremely important that we have a clear framework guiding our decision-making. The Code of Conduct sets clear expectations on our business conduct and provides guidance for critical risk areas.

Each of us working for WithSecure™ has a critical role in building and maintaining the trust in the eyes of our Fellows and earning the trust of our customers. This Code of Conduct must guide everything we do at WithSecure™. It is our duty to ask for advice whenever we are unsure about what course to take. Together, we can take our Code of Conduct into action.”

**Juhani Hintikka,**  
**President and CEO**







# Applicability

The Code of Conduct applies to all WithSecure employees and leadership anywhere WithSecure operates.

In addition to the principles in this Code of Conduct, WithSecure Fellows must comply with WithSecure internal policies, guidelines and processes as well as applicable local laws.

In some cases, local laws may be less restrictive than the principles discussed here. In those situations, the Code of Conduct should be followed. If local laws are more restrictive than these standards, local laws apply.

WithSecure suppliers and partners are also expected to act responsibly and comply with the principles set in this Code of Conduct.



# WithSecure™ Code of Conduct

- Building Trust in Society
- Responsible Working with Malware and Offensive Techniques
- Intellectual Property Rights and Confidentiality
- Equality and Diversity
- Protecting Human Rights
- Respecting the Environment
- No Bribery or Corruption
- Preventing Conflicts of Interest
- Securities Markets Compliance
- Trade Compliance
- Fair Competition

# Building Trust in Society

We create high-end cyber security products and services to protect businesses and organizations from cyber threats.

We cooperate with authorities and law enforcement to ensure safety of the society from cyber criminals.

We take action to enhance cyber security know-how in society.

We build privacy and security into the design of our solutions. We apply strict security measures to protect the personal data of the users of our solutions. We seek to protect our users' privacy, not to sell it.

We create our products and services independent of governmental direction.

We recognize that there is an imbalance between the defenders of fair practices and human rights, and online criminality and the offensive capabilities of nation state threat actors. To level the playing field, we refuse to introduce backdoors in our products and will detect malware no matter what the source is.







# Responsible working with Malware & Offensive Techniques

We work with clear criteria for categorizing threats and classifying potential unwanted applications. We follow strict rules for handling and analyzing malicious content.

We cooperate with authorities to ensure the safety of the general public, assisting investigations into online crime that bring criminals into justice.

We conduct security assessments with customers' permission and only within agreed scope.

In our work, we may create offensive code, but only do so with the intention to secure and benefit our customers and digital safety of the society.

We follow a coordinated vulnerability disclosure policy and we place our own products under a vulnerability reward program.



# Intellectual Property Rights and Confidentiality

We recognize the value of innovation and actively protect the intellectual property rights of WithSecure. This includes patents, software and other copyrighted materials, knowhow, trade secrets and trademarks.

We respect and protect the intellectual property of others with the same degree of care as our own and always honor the terms of any agreement.

We honor third party rights, including the rights of the open source community.

We safeguard confidential information of WithSecure, our business partners and customers from unauthorized disclosure and misuse.





# Equality and Diversity

We believe in equality and diversity. We know employees who represent different backgrounds, expertise and genders contribute to a more open working atmosphere as well as better discussion and decision making.

We assess individuals based on competence, skills and achievements. Equality, non-discrimination and fairness are key principles in recruitment, compensation and advancement at WithSecure.

To support gender equality in our industry, we encourage girls and women to pursue a career in technology and cyber security.

We do not tolerate harassment. We do not allow conduct which can be considered harassing, intimidating or disruptive.

We take personal responsibility for creating and maintaining a positive working atmosphere. We encourage employees to raise questions and suggest improvements.



# Protecting Human Rights

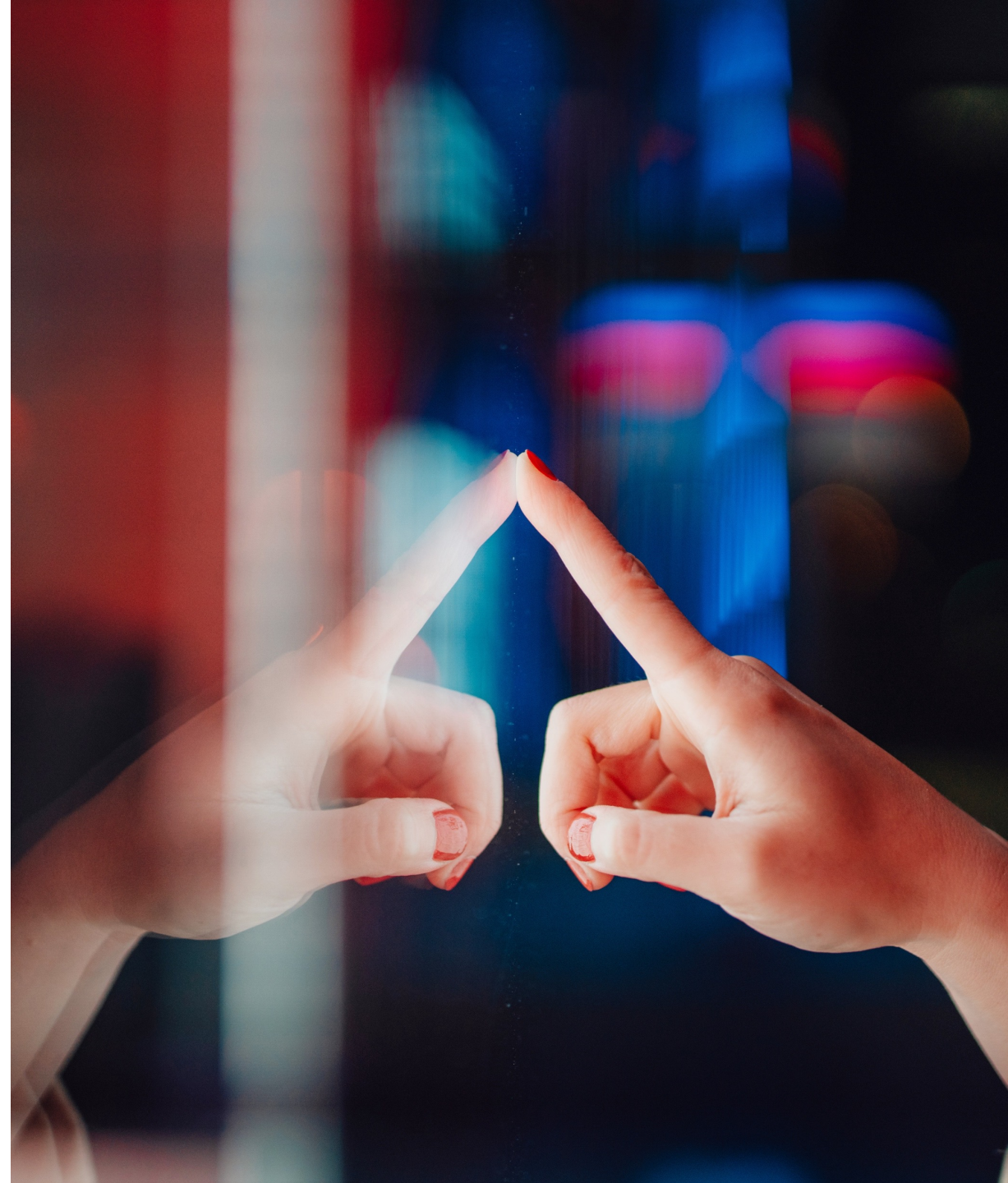
We honor internationally recognized human rights standards.

We respect the freedom of opinion and expression as well as freedom of conscience and religion.

We fight to protect people's digital lives and help for example schools, hospitals, and even cities to create safe networks.

We respect the freedom of association and employees' right to organize.

We actively ensure safe and healthy working conditions. We do not tolerate any use of child labor, any form of forced labor or any other human rights violations.







# Respecting the Environment

We are committed to working in an environmentally responsible and efficient manner and strive to minimize our environmental footprint.

We aim to continuously increase the energy efficiency of the company as well as to reduce the amount of waste and emissions produced by our operations.

We encourage the use of environmentally friendly technologies, tools and services in the research and development of our products and services.

We aim to reduce the environmental impact of our global operations by connecting people from different locations through technology and choosing environmentally friendly means of travelling.



# No Bribery or Corruption

We do not make or accept any bribes or other improper payments.

We never engage in fraudulent practices.

We do not give or accept gifts or hospitality over the appropriate limits.

We do not endorse or provide financial support to individual political parties.

When conducting business with any governmental body, we carefully abide by all applicable regulations and ethical standards.

We do not tolerate any form of bribery, corruption or fraudulent practices by our partners or any parties acting on our behalf.







# Preventing Conflicts of Interest

We always act in the best interests of WithSecure.

We are aware that conflicts of interest arise in the work environment when making decisions that may benefit oneself, one's friends or family.

We avoid situations where any personal relationship or financial interest may influence our decisions.

We understand that conflicts of interest can occur even if we are convinced our decision making is not swayed by personal interests or relationships.

If any conflict of interest arises, we will disclose it immediately and take necessary steps to resolve it.



# Securities Markets Compliance

We provide reliable, transparent and honest market communication.

We avoid any activities which might reduce trust in the securities market.

We abstain from any trade of financial instruments using undisclosed information that could be considered insider trading.

We are aware of the types of information that could be considered inside information and recognize a need for a constant assessment of such information.

All of our books, records, accounts and financial statements conform to the applicable legal requirements.







# Trade Compliance

We comply with trade laws that impact our operations, including export control and international sanctions regulations.

We are careful with the use of cybersecurity tools and methods we use as part of our services make sure that they do not end up in the hands of criminals or other offensive actors.

We are transparent in our operations. In every jurisdiction where we operate, we cooperate with the authorities to ensure compliance of regulations.

# Fair Competition

We value and support fair and free competition.

We will not take part in any activities that restrict fair competition.

We take action against unfair practices and violations of competition laws as soon as we become aware of them.

We do not discuss sensitive topics such as pricing, strategy, roadmaps or customers with our competitors.

We do not limit the ability of our business partners to freely set the resale price of our products or services





# Whistleblowing

- If you have questions about this Code of Conduct or you have any uncertainty about actions you may take or decisions you may make, please contact WithSecure Legal & Compliance.
- You have the right and the obligation to raise a concern of a violation of the Code of Conduct.
- WithSecure provides multiple ways to raise a concern. You may talk to your line manager, Legal or HR representatives. Concerns may also be reported via the Whistleblowing Channel.
- WithSecure strongly encourages you to speak up if you suspect or witness any such behavior, activities or conduct. WithSecure provides you with an effective, objective, confidential and secure reporting channel, the Whistleblowing Channel, allowing you to openly and safely express your concerns. The Whistleblowing Channel is available to you 24/7 at [Whistleblowing Channel](#).
- In case you wish to file a whistleblowing report, please read carefully the [Whistleblowing Policy](#) prior to filing the report.
- All concerns are handled confidentially. Each reported concern will be reviewed. Appropriate measures will be taken against violations of the Code of Conduct.
- We are committed to maintaining a culture in which everyone can feel comfortable raising good faith concerns about violations of the Code of Conduct. We do not tolerate adverse action against anyone who raises a good faith compliance concern.

For more information,  
please visit:

[Whistleblowing policy](#)

For more information,  
please visit:

[Whistleblowing channel](#)

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