

# CODE OF CONDUCT

## INTRODUCTION

Our company Values (Take Care of Customers and Our People; Do What's Right for Digital Security; Innovate to Solve Problems) affirm what we believe. To embody these Values, we adopt a Culture of C.A.R.E., operated by the four drivers defining C.A.R.E.: Customer Obsession, Amazing Innovation, Relentless Execution, and Exceptional Collaboration.

Our Values and the C.A.R.E Culture that affirms them remain empty statements unless we commit to and frame our day-to-day actions and decisions using these principles. That is why we have this Code of Conduct. It sets the rules we all agree to as employees, contractors, and suppliers of DigiCert, keeping our Values and Culture consistent and meaningful.

This Code applies to all employees of DigiCert around the world—from the CEO and our Board of Directors all the way through our organization. In addition, all temporary workers, contractors, and service providers must read and familiarize themselves with the Code of Conduct that governs our business.

DigiCert is very serious about maintaining integrity, corporate stewardship and abiding by the law. Every employee must live by these principles and abide by the Code, including reporting any suspicious conduct or violations of this Code. Unethical or unlawful action—or a failure to report such action—will subject you to appropriately serious discipline regardless of your position and past service to the Company.

DigiCert has established a dedicated SpeakUp@DigiCert reporting service to provide an easy and confidential means of reporting suspected misconduct. All employees, customers and vendors have access to this secure and confidential third-party service provided by Canada-based Whistleblower Security.

Reports to SpeakUp are confidential with respect to DigiCert personnel—even those investigating the issue.

### A. Do you have a question about this Code or about anything in your own or others' work that presents an ethical dilemma or problem? Do you have something to report?

Contact your manager, Legal, our dedicated SpeakUp reporting service or any appropriate person in the contact list below to discuss the situation or report any potential violation of these rules. You have the power and responsibility to make our Values and Culture meaningful and to strengthen and protect our company. Don't leave a question unanswered or a problem unmentioned. A failure to report misconduct may in fact subject you to appropriate discipline.

No action can or will be taken against you for making a report or asking a question in good faith. Reports will be held in confidence. Any company manager who acts against an employee for reporting or raising an issue in good faith will be appropriately disciplined.

Your reports of suspected violations of this Code will be thoroughly investigated. Anyone found to have violated this Code will receive discipline appropriate to the seriousness of the violation. In many cases this will include immediate dismissal.

This Code does not list every company rule or policy, but it provides a brief guide to the key rules governing employee and representative conduct. You can find additional information about DigiCert policies in your Global Employee Policy Guide and in the People Policy section of The Root. You can also ask your local HR representative or contact:

- [peopleams@digicert.com](mailto:peopleams@digicert.com) (AMS)
- [peopleapj@digicert.com](mailto:peopleapj@digicert.com) (APJ)
- [peopleemea@digicert.com](mailto:peopleemea@digicert.com) (EMEA)

A waiver of any rule in this Code to any person or situation can only be provided in writing by DigiCert's Chief Legal Officer

## B. Important Contacts

### **Confidential questions/reports:**

Please use our dedicated SpeakUp@DigiCert reporting service provided by Whistleblower Security. This service is available 24/7/365, can assist reporters in multiple languages and is 100% confidential.

Methods of Reporting:

Online: <https://www.integritycounts.ca/org/digicert>

Email: [digicert@integritycounts.ca](mailto:digicert@integritycounts.ca)

Toll-Free Numbers:

- 0011-800-2002-0033 (Australia)
- 00-800-2002-0033 (Belgium, Germany, Ireland, Netherlands, South Africa, Spain, Sweden, Switzerland)
- 400-120-8514 (China)
- 001-800-2002-0033 (Hong Kong/Singapore)
- 0008001007980 (India)
- 0120-958-144 (Japan)
- 001- or 002- or 008-800-2002-0033 (South Korea)
- 0-800-092-3586 (UK)
- 1-866-921-6714 (USA)
- 1-604-922-5953 (Bermuda – COLLECT CALL)

### **General policy/human resource questions:**

[people@digicert.com](mailto:people@digicert.com)

### **Legal**

Mike Johnson (Chief Legal Officer):

[mike.johnson@digicert.com](mailto:mike.johnson@digicert.com)

Aaron Olsen (VP/Assoc. General Counsel)

[aaron.olsen@digicert.com](mailto:aaron.olsen@digicert.com)

### **People (HR)**

Sinead Godkin (Chief People Officer):

[sinead.godkin@digicert.com](mailto:sinead.godkin@digicert.com)

AMS: Akhila Katragadda (Head of People Partners, AMS - Texas): [akhila.katragadda@digicert.com](mailto:akhila.katragadda@digicert.com);

Blaine Dudgeon (People Business Partner – Lehi): [blaine.dudgeon@digicert.com](mailto:blaine.dudgeon@digicert.com)

EMEA: Wayne Lombard (Head of People Partners, EMEA -South Africa): [wayne.lombard@digicert.com](mailto:wayne.lombard@digicert.com)

APJ: Kaitlan Collis (Head of People Partners, APJ -Australia): [kaitlan.collis@digicert.com](mailto:kaitlan.collis@digicert.com)

Japan: Miki Kimura (Sr. People Business Partner - Japan): [miki.kimura@digicert.com](mailto:miki.kimura@digicert.com)

### **Information Security**

Jeremy Rowley (Chief Information Security Officer):

[jeremy.rowley@digicert.com](mailto:jeremy.rowley@digicert.com)

Aaron Blakely (VP, Information Security):

[aaron.blakely@digicert.com](mailto:aaron.blakely@digicert.com)

## WE TAKE CARE OF CUSTOMERS AND OUR PEOPLE

### A. We Celebrate an Inclusive and Supportive Work Environment

First and foremost, DigiCert is committed to an inclusive environment that allows people to do their best work and be themselves. DigiCert provides an equal employment opportunity for all our applicants and employees. That means we hire and promote based on individual merit and qualifications; we don't tolerate discrimination, harassment, bullying or retaliation; and we take complaints on these issues seriously.

Accordingly, DigiCert strictly prohibits discrimination and harassment based on any category recognized by law or custom, including on the basis of race, color, religion, citizenship, political activity or affiliation, marital status, age, national origin, ancestry, disability, medical condition, genetic information, veteran status, military status, sexual orientation, sex or gender, gender identity, gender expression, pregnancy, potential pregnancy, childbirth and breastfeeding, taking or requesting statutorily protected leave or any other characteristic protected under applicable law.

Everyone at DigiCert is prohibited from engaging in any discriminatory, harassing or bullying conduct, whether or not based on a protected category listed above. This prohibition extends to all employees, managers and third parties. We prohibit harassment and bullying in any form, whether verbal or physical, and unwanted sexual advances.

If you believe you have been subject to harassment or discrimination, or any other conduct that you believe might violate this policy, you must immediately report the facts of the conduct to your manager, our SpeakUp@DigiCert reporting service at [www.integritycounts.ca/org/digicert](http://www.integritycounts.ca/org/digicert), a People Business Partner, or Legal (see "Important Contacts," above).

If a manager receives a complaint, they must immediately report the complaint to People or Legal within forty-eight (48) hours of receiving the complaint; a failure to report may subject the manager to appropriate discipline.

DigiCert strictly prohibits retaliation against anyone who complains of discrimination or harassment or who participates in an investigation of discrimination or harassment. Any retaliatory activity in violation of this policy will be cause for appropriately serious discipline.

### B. We Maintain a Drug-Free Workplace

Misusing, selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs or controlled substances or being intoxicated by any influence is prohibited in the workplace or while performing work-related duties. In addition, some legal and prescribed drugs may be incompatible with certain job duties. If you are currently taking any prescribed or legal course of medication that may affect your ability to do your job or impair your judgment in any way, you are required to inform your manager.

### C. We Enjoy a Safe Workplace

DigiCert doesn't tolerate violence or threats in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to People immediately.

### D. We Act Fairly

DigiCert deals fairly with our customers, suppliers, competitors and employees. No person acting on behalf of DigiCert may take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts or other unfair dealings or practices. DigiCert is committed to following internationally accepted fair labor practices.

## E. We Respect Agreements and Commitments to Others

DigiCert encourages you to respect and abide by your contractual or other legal obligations to former employers and other parties. If you have any such obligations relevant to your work at DigiCert, you must disclose them to People, your manager or Legal before you begin work at DigiCert. If you have questions about legal obligations to any third party relevant to your work at DigiCert, discuss with Legal.

## F. We Are Committed to Human Rights

DigiCert supports the protection and preservation of human rights around the world, including anti-slavery and other human rights principles, by following the fundamental principles set forth in the United Nations Universal Declaration of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the UK Modern Slavery Act 2015.

Accordingly, DigiCert is opposed to all forms of human rights violations, including human trafficking, slavery, servitude, forced or compulsory labor, child labor and all other trafficking-related activities. DigiCert expects its employees and business partners to act in accordance with these principles and all applicable laws and regulations regarding labor and employment.

As an employee, be alert to any potential scenarios, either within the company or in our supply chain, where human rights violations, including child or compulsory labor, may be taking place. If you become aware of such a scenario, or are suspicious of one, report it to SpeakUp or Legal immediately.

## G. We Respect Securities Laws

No employee, officer or director of the Company, or any family member of any such person, may purchase or sell any security of any other company while in possession of material nonpublic information about that company that was obtained in the course of his or her involvement with the Company. For example, you may be involved in a proposed transaction involving a prospective business relationship or transaction with, or

investigation of, another company. If information about that transaction or investigation constitutes material nonpublic information for that other company, you are prohibited from engaging in transactions involving the securities of that other company.

## WE DO WHAT'S RIGHT FOR DIGITAL SECURITY

### A. We Protect the Personal and Confidential Data Entrusted to Us

DigiCert has been entrusted with personal and confidential data by its employees, customers and other third parties. As an employee, you have access to this information, as well as confidential information belonging to DigiCert itself. We are a leader in the digital security industry, so we take the responsibility to keep information secure very seriously. No matter how much we invest into security systems and technologies, if you or your colleagues don't take this responsibility seriously, we are vulnerable.

All personal data held by DigiCert—from our employees, customers or others—is strictly confidential. Personal data includes any information relating to an identified or identifiable natural person, whether that person is a co-worker, or associated with a customer or vendor of DigiCert, or any other person whose information DigiCert possesses. You are not allowed to use or disclose it in any way or form except as part of your regular job duties or as approved by your manager.

In addition, you may have access to confidential or non-public information belonging to DigiCert or its customers, vendors or other third parties. You must keep all such information confidential and not disclose it to anyone other than in performing your regular job duties. Don't disclose personal or confidential data in public conversations, through social media, outside of DigiCert computer systems and networks, or through any means that could compromise or improperly disclose personal data.

Using or disclosing personal or confidential data improperly is a serious breach of duty. You will be subject to appropriately serious discipline, including termination and civil and criminal penalties. If you have a question about what constitutes personal or confidential information or about how you are using such information, ask your manager, Legal or contact DigiCert's Data Privacy Officer at [dpo@digicert.com](mailto:dpo@digicert.com).

If you have duties of confidentiality to a former employer or any other party arising from a contract or from another legal or ethical obligation, you must disclose this to your manager or Legal. Improperly disclosing another party's confidential information to DigiCert is a violation of this Code.

Your use of AI and other software tools is subject to your confidentiality obligations and this policy. For more information see DigiCert's policy "Use of Generative AI."

## **WE INNOVATE TO SOLVE PROBLEMS ETHICALLY AND PROFESSIONALLY**

### **A. We Avoid Conflicts of Interest**

As an employee of DigiCert, you are expected to act in DigiCert's best interests and not seek your own or another's benefit apart from or to the detriment of DigiCert. Be sensitive to any activities, interests or relationships that might interfere with, or even appear to interfere with, your ability to act in the best interests of DigiCert and our customers. You're not allowed to take a potential corporate opportunity that is discovered in the course of your DigiCert employment or representation or through the use of corporate property, information or position. It goes without saying that you may not compete against DigiCert while working for or representing the company. If you have a question about a particular relationship or situation, contact Legal for help.

In addition, without written approval from the Company's Board (in the case of an Executive) or the Executive Leadership Team (if not an Executive), employees are not permitted to engage in simultaneous employment of any kind with the Company and one of

its customers, resellers, partners, vendors or suppliers; likewise an employee of the Company is not permitted to maintain a directorship or any leadership position, nor more than a 3% ownership interest, in a customer, reseller, partner, vendor or supplier of Company.

### **B. We Don't Offer or Accept Bribes**

DigiCert strictly prohibits all its directors, employees and agents from giving or receiving bribes of any kind. Accepting token (around US \$75-value or less) non-cash gifts or entertainment from non-government sources is permissible. Likewise, token non-cash gifts and entertainment may be offered to non-government-associated customers, unless the gift or entertainment could be seen as consideration for business or favor. Giving or accepting gifts of any kind to or from government officials, or related individuals, is forbidden without a specific waiver of this policy from DigiCert's Chief Legal Officer. Using third-party intermediaries to circumvent this policy is a violation of this Code. If you have a question about whether accepting or giving a particular gift would violate this policy, contact Legal.

### **C. We Don't Exert Political Influence without Direction from the Executive Leadership Team.**

Employees are prohibited from making payments or contributions on behalf of the Company to any political party, agent or representative without written direction from the Executive Leadership Team of the Company. Employees engaging in any political or public activity must make clear that such activity is not undertaken on behalf of the Company, and that Employee's views and activities are Employee's own and do not represent the Company's statements or positions. Employees are prohibited from engaging in political or public activities which are inconsistent with Company values or that would bring the Company into disrepute or cause the Company reputational harm. An Employee is not permitted to run for office or accept appointment in government service without prior written permission of the Executive Leadership Team of the Company.

## D. We Respect Antitrust and Fair Competition Laws

DigiCert forbids unlawful or unethical anticompetitive conduct. Examples of unlawful/unethical anticompetitive conduct include:

- Proposals from competitors to share price or other competitive marketing information or to allocate markets or customers.
- Attempts by clients, resellers or potential customers to preclude DigiCert from doing business with, or contracting with, another customer or reseller.
- Discussions at industry trade association meetings on competitively sensitive topics, such as prices, pricing policies, costs and marketing strategies.

If a competitor, reseller or a customer tries to discuss subjects with you that raise concerns about anticompetitive conduct, you should refuse to do so and ask the person to stop immediately. Promptly report any suspicion of anticompetitive conduct to SpeakUp or Legal.

## E. We Are Committed to Honesty and Integrity in All Business Dealings

In all advertising, marketing, customer communications and other commercial activities, we are committed to principles of honesty, integrity and transparency. Among other things, this means we will not consciously misrepresent facts or make false or unsubstantiated claims. Nor do we disparage the products or service offerings of competitors, or otherwise misrepresent facts relating to competing companies. If you are aware of practices that potentially raise such concerns, you should promptly contact Speak Up or Legal.

## CONCLUSION

This Code of Conduct covers several of the most important conduct rules that govern our business. It doesn't cover every potential situation that is unethical or illegal or worthy of disciplinary action. DigiCert trusts you to act ethically, legally and in the best interests of the company, using your best judgment. If you have any questions about this Code or any conduct issue, contact Legal or an appropriate contact listed at the beginning of this document. If you want to make a confidential report about any suspected violation of this Code or any unethical conduct, use our SpeakUp reporting system at [www.integritycounts.ca/org/digicert](http://www.integritycounts.ca/org/digicert). DigiCert relies on you to give real meaning to our Values through your ethical and professional conduct.



## CODE OF CONDUCT: SALES & MARKETING SUPPLEMENT

### A. Applicability

This Sales & Marketing Supplement builds on the Code of Conduct and applies to all DigiCert personnel around the world involved in marketing or sales. Contractors, suppliers and service providers must also read and be familiar with this Supplement.

### B. Expected Behaviors by Marketing and Sales Personnel

Consistent with the principles of honesty, integrity and transparency set forth by the Code of Conduct as well as general principles of ethics, DigiCert personnel, contractors, suppliers and service providers must ensure that their interactions with customers, potential customers and the public at large are truthful and fair, and must not consciously misrepresent facts or make false or unsubstantiated claims. Failure to abide by these principles may lead to severe discipline, including but not limited to termination of employment. The topics below are non-exclusive examples of practices that must be followed to ensure compliance with such principles.

### Fair Assessments, Comparisons, Ratings and Reviews

In the context of all marketing, advertising and customer sales activities, DigiCert personnel, contractors, suppliers and service providers must not share information that tends to mislead or confuse customers, potential customers or the public at large about our products or our company. When making representations, including when referring to assessments, comparisons, ratings or reviews of our products or the company, we must rely upon information from independent and unbiased sources unaffiliated with our company, or, to the extent we are relying on assessments, comparisons, ratings or reviews from sources affiliated with our company, we must disclose any such affiliations.

### Fair Competition and Pricing Practices

Similarly, DigiCert personnel, contractors, suppliers and service providers must not engage in unfair or manipulative bidding or pricing practices. In particular, we must not mislead or confuse customers, potential customers or the public at large about pricing or bidding by affiliated persons or entities—for instance, by referring to pricing or bidding by persons or entities affiliated with DigiCert and falsely representing, directly or indirectly, that such persons or entities are third-party competitors.



For more information, contact a People representative at [people@digicert.com](mailto:people@digicert.com) or refer to the contact list provided.

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