

Clavister Code of Conduct

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Introduction

At Clavister, we deliver innovative cybersecurity solutions trusted by organisations with mission-critical applications. Trust is fundamental to our business, and maintaining the highest standards of conduct is central to how we operate.

This Code of Conduct describes the principles, behaviours, and expectations that guide how we work – with customers, partners, colleagues, and society. It applies wherever we operate and is supported by policies, processes, and routines at both group and local levels, adapted as needed to comply with applicable laws and regulations. This Code also serves as a practical guide for everyday decision-making.

Our credibility depends not only on technical excellence, but on how we conduct ourselves. By acting thoughtfully, responsibly, and with respect for the broader context in which we operate, we strengthen both our company and the trust placed in us.

THE PURPOSE OF THIS CODE IS TO

- Clarify our shared expectations
- Support sound decision-making
- Strengthen a culture of responsibility, integrity, and professionalism

WHO IT APPLIES TO

The Code applies to all team members such as employees, board members, consultants, students and others representing Clavister. Each of us is responsible for understanding and following these standards in all professional interactions.

We also encourage our partners, contractors, and suppliers to adopt equivalent standards of ethical business conduct.

FAILURE TO COMPLY

Failure to comply with this Code may result in disciplinary action, up to and including termination of employment, in accordance with applicable laws and company policies.

Our Foundation

Clavister’s work is guided by trust and five core values. Trust is fundamental to who we are – it is what we build for our customers and how we work with each other. It is earned through our actions and upheld through our shared responsibility.

Our core values guide how we act:

GROWTH

We learn, adapt, and grow stronger through feedback and action.

INNOVATION

We explore with curiosity and openness, experimenting and learning our way forward.

CARE

We care for each other, for what we do, and for our mission.

COLLABORATION

We collaborate openly across teams and perspectives, building confidence and belonging.

BRAVERY

We face challenges with courage and resilience to grow with change.

These principles support both our long-term business success and our role in society.

Commitments Under Our Code of Conduct

This Code of Conduct outlines the commitments we make as a company, the responsibilities we share as employees, and the additional expectations placed on leaders. These commitments reflect how we build and maintain trust – with each other, with our customers, and with society. They are upheld through shared responsibility across the organisation.

CLAVISTER GROUP'S COMMITMENT

Clavister is committed to:

- Provide a clear framework of policies, standards, and expected behaviours
- Respect employees' human rights, dignity, and privacy
- Enable continuous learning through relevant training, guidance, and access to information
- Foster an inclusive and open environment where employees feel supported to contribute, collaborate, and speak up
- Encourage curiosity, dialogue, and responsible innovation in how we work
- Listen and respond to questions and concerns in a timely manner
- Not tolerate retaliation or discrimination against anyone who raises a concern in good faith
- Encourage suppliers, contractors, and business partners to uphold equivalent standards
- Support the implementation of this Code through internal policies, processes, training, and a structured, risk-based approach to identifying, assessing, and managing risks and potential impacts across our operations and business relationships

EMPLOYEE RESPONSIBILITIES

All employees at Clavister are expected to:

Know what to do

- Be familiar with the Code of Conduct and know where to seek guidance
- Understand and follow Clavister Group policies, processes, and standards
- Engage only in activities that are ethical, lawful, and aligned with this Code

Act responsibly

- Treat others with professionalism, respect and care
- Conduct business in an open, honest, and transparent manner
- Comply with applicable laws and regulations, in both letter and spirit
- Remain attentive to risks and potential warning signs
- Show courage in raising concerns and addressing challenges
- Seek guidance when unsure or when something does not feel right
- Support colleagues in doing the right thing
- Report any deviations from this Code without delay

LEADERSHIP RESPONSIBILITIES

Act as role models

- Demonstrate integrity and uphold high standards of conduct
- Promote open dialogue and encourage diverse perspectives
- Create an inclusive environment where individuals can perform, contribute and grow
- Foster a culture where team members feel comfortable raising concerns and seeking advice

Taking responsibility

- Support team members in making ethical, informed and balanced decisions
- Ensure compliance with applicable laws, regulations, and Clavister Group policies
- Hold yourself and your team accountable for upholding this Code
- Act promptly when concerns are raised
- Take appropriate measures to protect individuals from retaliation (Care, Collaboration)
- Seek guidance when needed

POLICIES AND FURTHER GUIDANCE

- Our Values
- Our STAR-Model
- Management System Policy
- Leadership Manifesto

Our Model for Responsible Behaviour

Our Code cannot cover every situation we may face. When we encounter an unfamiliar or uncertain situation, this model helps guide responsible decision-making. At Clavister, we use the STAR model as a practical tool to support sound judgement and ethical action.

S – Stop

Pause if you are unsure how to act.

- Do not act on impulse or under pressure
- Take a moment to consider the situation.

T – Think

Assess the situation.

- Is this legal and in line with our Code and policies?
- Does it reflect our values and expected behaviours?
- How could this effect others, our Clavister Group or our stakeholders?
- Could this impact trust, security or our reputation?
- Would I be comfortable explaining or being accountable for this decision?

A – Ask

Seek guidance if needed.

- Do I need advice or a second opinion?
- Have I involved the right people such as my manager or a relevant colleague?

R – React

Take appropriate action based on your assessment.

- Act in line with our Code and policies.
- Raise concerns or report anything that does not seem right.
- Escalate issues that may pose risks to people, trust, or the business without delay.
- If in doubt, choose the option that reflects our values and protects trust.

***“If something does not feel right, it probably isn’t.
Take a step back and use the STAR model.”***

Speaking Up

Clavister promotes an open and respectful culture where concerns can be raised constructively. If something appears inconsistent with our Code, policies, or applicable laws, you are expected to speak up. If you are unsure, it is always better to raise concern than to remain silent.

You can raise concerns through one of the following channels:

- Your manager
- A relevant function (e.g., HR, Legal, Compliance, Security)
- The whistleblowing channel, where appropriate

Concerns raised in good faith are taken seriously and handled with respect and confidentiality. We do not tolerate retaliation against anyone who speaks up.

We view open dialogue as a strength and an opportunity to learn, improve, and act responsibly. Speaking up helps us protect our people, our business, and the trust placed in us. If concerns are confirmed, we take appropriate action to address the situation and ensure it is handled responsibly.

External stakeholders, including customers, partners, and suppliers, may also raise concerns through our whistleblowing channels, where appropriate.

POLICIES AND FURTHER GUIDANCE

- [Whistleblower Policy](#)

- [Whistleblower Guideline](#)

Human Rights

At Clavister, we are committed to respecting internationally recognised human rights, as set out in the United Nations Global Compact and reflected in the Responsible Business Alliance (RBA) Code of Conduct. We treat all people with dignity and respect, as a foundation for responsible business and long-term trust. Respect for human rights is fundamental to how we operate – with each other, with our customers and partners, and in the communities where we operate. We believe that equal treatment and respect for diversity contribute to a stronger, more innovative organisation.

FAIR AND RESPECTFUL WORKING CONDITIONS

We are committed to fair and lawful working conditions. We do not accept any form of forced labour, child labour, or human trafficking. All work must be voluntary, and individuals must be free to leave employment in accordance with applicable laws and agreements. We comply with applicable laws and standards related to working hours, wages, and benefits.

DIGNITY, EQUALITY, AND RESPECT

We are committed to a workplace free from discrimination, harassment, and any form of abusive or inhumane treatment. We treat each other with professionalism and respect, and we do not tolerate behaviour that undermines the dignity or rights of others. We do not tolerate discrimination based on characteristics such as gender, gender identity or expression, ethnicity, religion or belief, disability, sexual orientation, age, or other protected characteristics.

FREEDOM OF ASSOCIATION

We respect the right of employees to freely associate, to form or join organizations, and to engage in constructive dialogue with management, in accordance with applicable laws.

HEALTH AND SAFETY

We are committed to providing a safe and healthy working environment. We work to prevent work-related injuries and ill health, and to ensure that employees can raise health and safety concerns without fear of retaliation.

OUR BUSINESS RELATIONSHIPS

We expect our suppliers, contractors, and business partners to respect human rights and operate in line with standards equivalent to our own. We aim to work with partners who share our commitment to responsible and ethical business practices. We take a risk-based approach to assessing and monitoring our business partners and may take appropriate action where expectations are not met.

RAISING CONCERNS

Respecting human rights is a shared responsibility. If you experience or observe behaviour that may violate these principles, you are expected to raise your concern. Concerns can be raised through the channels described in the Speaking Up section of this Code.

RESPONSIBILITIES IN PRACTICE

All employees are expected to act in line with these principles and to treat others with dignity, respect, and fairness in all professional interactions. Leaders have a particular responsibility to promote a safe, respectful, and inclusive work environment, and to address concerns promptly and appropriately.

POLICIES AND FURTHER GUIDANCE

- People Policy
- Responsible Business Alliance (RBA) Code of Conduct
- United Nations Global Compact

Business Ethics

At Clavister, integrity, transparency, and accountability guide how we conduct our business. We are committed to complying with applicable laws and regulations and to maintaining high ethical standards in all our business activities. Acting responsibly in how we conduct business is essential to building and maintaining trust with our customers, partners, and stakeholders. We assess and monitor business partners to identify, manage, and reduce risks.

COMPLIANCE WITH LAWS AND REGULATIONS

We comply with applicable laws, regulations, and industry standards in all markets where we operate. As a company operating in regulated environments, this includes areas such as export controls, sanctions, data protection, and defence- and security-related regulations. Each of us is responsible for understanding the legal and regulatory requirements relevant to our role and for acting in accordance with both the letter and the spirit of the law. When uncertainties arise, we seek guidance and clarification before acting. Compliance is a shared responsibility and a fundamental part of how we conduct our business.

ANTI-CORRUPTION AND BRIBERY

We have zero tolerance for bribery, corruption, or any form of improper advantage. We do not offer, give, request, or accept anything of value that could improperly influence business decisions or create the appearance of undue influence. This includes both direct and indirect actions, through third parties or intermediaries.

Gifts and hospitality

Gifts, hospitality, and other benefits must always be modest, reasonable, and transparent. They must be appropriate to the

business relationship and must never influence, or appear to influence, business decisions. Particular care must be taken in interactions with public officials and in defence- and security-related contexts, where stricter rules and standards apply.

Avoiding improper conduct

We do not permit facilitation payments or any other unofficial payments intended to secure or expedite routine actions. We avoid situations that could compromise – or appear to compromise – our objectivity, integrity, or independence.

Third parties and business partners

We expect our suppliers, partners, and representatives to act with the same level of integrity and to comply with applicable anti-corruption laws and standards. We take reasonable steps to assess and monitor business partners to reduce the risk of corruption.

Examples of situations to be aware of:

- Accepting gifts or hospitality that could influence, or appear to influence, a business decision
- Offering benefits through third parties to gain an advantage
- Engaging a partner without sufficient transparency regarding their role or compensation

CONFLICT OF INTEREST

We make business decisions in Clavister's best interest. We avoid situations where personal relationships, financial interests, or external engagements could influence – or be perceived to influence – our professional judgement. If a potential or actual conflict of interest arises, it must be disclosed and managed in a transparent manner. Conflicts of interest may arise, for example, through personal relationships, outside employment, financial interests, or other commitments that could affect objectivity or decision-making. Transparency enables sound decisions and helps protect both the individual and the Clavister Group.

Examples of situations to be aware of:

- Being involved in decisions affecting a company where you have a personal relationship or financial interest
- Hiring or influencing the recruitment of a friend or family member
- Holding external roles or interests that may interfere with your responsibilities at Clavister

FAIR COMPETITION

We compete based on the quality of our solutions and our expertise. We respect competition laws and do not engage in practices that restrict fair and lawful competition. We do not enter into agreements or engage in discussions with competitors that could influence pricing, market allocation, or other competitive conditions. Professional interactions with competitors and industry peers must always be lawful, appropriate, and conducted with care.

ENGAGEMENT WITH PUBLIC AUTHORITIES

We engage with public authorities and government-related stakeholders in a responsible, transparent, and lawful manner. We comply with applicable laws, regulations, and internal requirements governing such interactions.

INFORMATION SECURITY AND CONFIDENTIALITY

Information security is central to Clavister's mission. Maintaining strong information security is essential to protecting the trust our customers and partners place in us.

We protect confidential, sensitive, and business-critical information, including customer information, technical and commercial data, intellectual property, and information subject to legal or regulatory requirements.

We handle information responsibly and ensure that it is accessed, used, stored, and shared only for legitimate business purposes and in accordance with applicable laws, regulations, and internal policies.

All employees are expected to follow internal security policies, handle information with care, and use approved systems and tools when accessing or managing information.

We protect information from unauthorised access, loss, misuse, or disclosure.

We remain vigilant to potential risks and report suspected security incidents or weaknesses without delay.

Information security is not only a technical matter – it is a shared responsibility and a fundamental part of our culture.

Acting responsibly

We protect credentials, access rights, and sensitive information from unauthorised use. We ensure that devices and systems are used securely, including when working remotely.

Examples of situations to be aware of:

- Sharing sensitive information with unauthorised individuals
- Using unapproved systems or personal devices for company information
- Failing to secure devices or credentials when working remotely

**DATA PROTECTION
AND PRIVACY**

We respect the privacy of individuals and handle personal data in a lawful, fair, and responsible manner. Personal data must be processed only for legitimate purposes, limited to what is necessary, and protected through appropriate safeguards.

We comply with applicable data protection laws, including GDPR, and ensure that personal data is handled with care and respect for individual rights.

**ACCURATE RECORDS
AND TRANSPARENCY**

We maintain accurate, complete, and reliable records of our business activities. All information, including financial and non-financial records, must be recorded in a truthful, timely, and transparent manner.

We do not falsify, omit, or misrepresent information, and we ensure that records reflect the true nature of transactions and decisions.

We follow applicable laws, regulations, and internal controls related to record keeping, reporting, and documentation.

**RESPONSIBLE
COMMUNICATION**

We communicate in a truthful, respectful, and responsible manner. Information shared internally and externally must be accurate, appropriate, and aligned with our values, policies, and applicable laws.

External communication on behalf of Clavister must follow internal guidelines and be handled by authorised individuals where required.

We exercise good judgement in how we communicate, including when using social media, and ensure that confidential or sensitive information is not disclosed.

**RESPONSIBLE DELIVERY
OF SOLUTIONS**

We are responsible for ensuring that our solutions are developed, delivered, and maintained in a way that supports security, reliability, and trust placed in our solutions. We consider potential risks, misuse, and unintended consequences of our technology and take appropriate measures to mitigate them. We act with care in how our solutions are designed, implemented, and supported, recognising their role in protecting critical systems and information.

**EXPORT CONTROLS AND
INTERNATIONAL TRADE
COMPLIANCE**

We comply with applicable export control laws, trade sanctions, and international trade regulations. These rules may restrict how our solutions – including products, services, software, technology, and related information – are transferred, shared, or used across borders or with certain individuals, organisations, or countries.

We do not engage in business with restricted parties or in prohibited markets, and we ensure that required checks are performed before entering into business relationships.

We handle controlled information and technology with care and do not share or transfer such information without proper authorisation.

Acting responsibly

Each of us is responsible for understanding and complying with export control and trade compliance requirements relevant to our roles.

Examples of situations to be aware of:

- Sharing controlled information with individuals who are not authorised to receive it
- Engaging with customers or partners without appropriate screening
- Transferring software, technology, or data across borders without required approvals

**RESPONSIBLE USE OF
COMPANY RESOURCES**

Company resources – including IT systems, financial assets, equipment, information, and intellectual property – must be used responsibly and for legitimate business purposes. We protect company resources from loss, damage, misuse, or unauthorised use and ensure that they are used with care and efficiency. Limited personal use may be acceptable where permitted, provided it does not interfere with work responsibilities or create unnecessary risk. Sound judgment and professionalism guide our use of shared resources.

**RESPONSIBILITIES
IN PRACTICE**

All employees are expected to act with integrity, exercise sound judgement, and comply with applicable laws, regulations, and Clavister Group policies in all business activities. When in doubt, we seek guidance before acting.

Leaders have a particular responsibility to promote ethical behaviour, ensure compliance within their teams, and address concerns promptly and appropriately.

POLICIES AND FURTHER GUIDANCE

- **Anti-corruption and bribery Policy**
- **Information Security policies**
- **Communication Policy**
- **Insider Policy**
- **Related Party Transaction Policy**
- **Risk Policy**
- **Finance Policy**

Social Responsibility

At Clavister, we recognise that our responsibility extends beyond compliance. We aim to act responsibly in how we engage with our employees, partners, customers, and the broader society in which we operate. We strive to contribute positively by fostering a strong workplace culture and ensuring that our technology and business practices support trust, security, and long-term value in the communities we serve. Our values guide how we contribute to a responsible and inclusive workplace and society.

WORKPLACE CULTURE AND INCLUSION

We promote an inclusive and respectful work environment where individuals feel valued and able to contribute. We recognise diversity as a strength and encourage collaboration across different perspectives, experiences, and backgrounds. We believe that equal opportunities and inclusive practices contribute to innovation, better decision-making, and long-term success. We promote a culture of trust, open dialogue, and collaboration, where individuals feel supported and encouraged to contribute.

WELLBEING AND DEVELOPMENT

We support the wellbeing of our employees and promote a healthy and sustainable work environment. We encourage continuous learning, development, and knowledge-sharing to support both individual growth and organisational success. We encourage feedback, participation, and continuous improvement to strengthen both individual wellbeing and organisational performance.

RESPONSIBLE BUSINESS RELATIONSHIPS

We aim to build long-term, responsible relationships with our customers, partners, and suppliers. Beyond compliance with human

rights, we encourage our business partners to operate in a responsible, transparent, and sustainable manner. We promote responsible sourcing practices, including avoiding materials and supply chains that may contribute to conflict, human rights abuses, or other unethical practices.

RESPONSIBLE USE OF TECHNOLOGY

As a cybersecurity company, we recognise the broader impact of our solutions. We strive to ensure that our technology is developed, delivered, and used in a responsible manner that supports security, trust, and the protection of critical systems and information.

SOCIETAL CONTRIBUTION

We recognise our role in society and aim to contribute positively through our operations, partnerships, and the way we conduct our business.

RESPONSIBILITIES IN PRACTICE

All employees are expected to contribute to a responsible, inclusive, and collaborative work environment and to consider the broader impact of their actions. Leaders are expected to promote these principles, support their teams, and encourage responsible decision-making in line with our values.

POLICIES AND FURTHER GUIDANCE

- Responsible Minerals Sourcing Policy
- Hybrid Work Policy

Environmental Responsibility

At Clavister, we recognise our responsibility to minimise the environmental impact of our operations and to contribute to a more sustainable future. We actively consider environmental impact in our decisions, processes, and ways of working, including climate-related impacts, the responsible use of natural resources, and the environmental impact of our products and supply chain from a lifecycle perspective, including responsible sourcing of materials where relevant.

RESPONSIBLE USE OF RESOURCES

We use energy, materials, and other resources efficiently and strive to reduce waste and unnecessary environmental impact.

We look for opportunities to reduce environmental impact and improve how we use resources in our daily work.

ENVIRONMENTAL AWARENESS IN OUR WORK

We consider environmental aspects in how we develop, deliver, and operate our solutions. We seek to make responsible choices in our daily work, including how we use resources, travel, and collaborate.

CONTINUOUS IMPROVEMENT

We work to improve our environmental performance over time and support initiatives that contribute to sustainability. We work in a structured and risk-based way to understand and manage our environmental impact. We take these considerations into account in our decisions and daily operations.

RESPONSIBILITIES IN PRACTICE

All employees are expected to act with awareness and take responsibility for reducing environmental impact where possible. Leaders are expected to support environmentally responsible decisions and promote sustainable ways of working.

POLICIES AND FURTHER GUIDANCE

- Climate Impact Policy
- Responsible Minerals Sourcing Policy

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