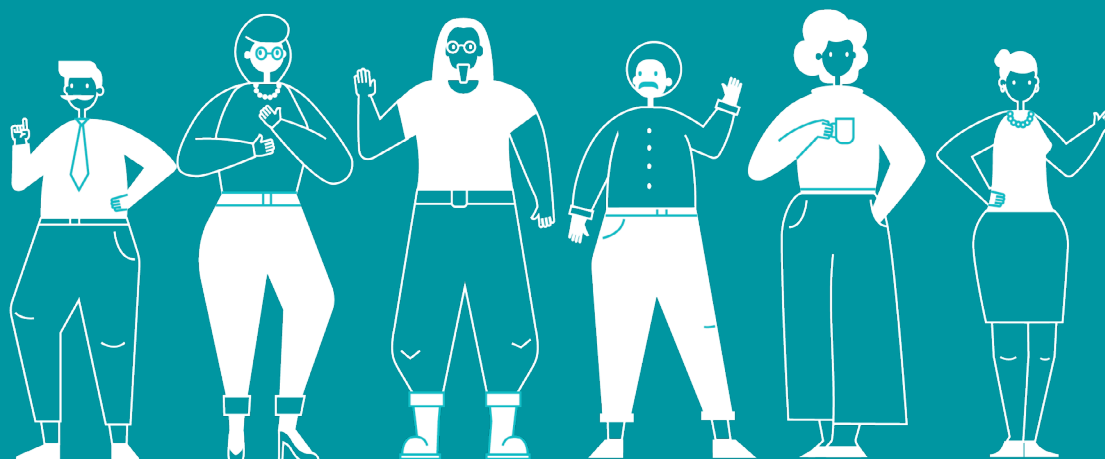


# CODE OF ETHICS AND INTEGRITY

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## Message from the CEO

Dear colleagues,

Together, we form a company built on strong moral principles and values. We believe it is important to behave with integrity, uphold strong personal relationships and have confidence in what we do. Every one of us has the responsibility to take active ownership of our mission, words and actions, so together we create an environment where engagement, collaboration and creative thinking thrive. We need to commit to being honest and staying transparent about our motives, because only in an environment where there is trust can we search and find solutions. When dealing with a difficult situation, we need to sometimes stop and reflect to make the right decision. It is the responsibility of each one of us, but especially of managers, to create and preserve an environment in which employees have the opportunity to learn, fulfil their potential and feel accepted for who they are. We expect our managers to lead by example and enable their teams to fulfil these goals. Our values help us create our common vision - to protect people and businesses in the digital environment. Our ambition is not only to achieve business success but also to serve as a positive inspiration for our surroundings through our behaviour, actions, and mutual relationships, thereby collectively and continually shaping the reputation of our company.

**Richard Marko, CEO**

# 1. OUR COMMITMENT

The Code of Ethics and Integrity of the company ESET, spol. s r.o. and all its branches (hereinafter collectively referred to as 'ESET group' or 'ESET') is based on mutual values and reflects the culture of integrity and high standards to which we hold ourselves. It is an important resource to help us, employees, to make the right decisions and take actions that are consistent with ESET's vision, mission, values, and our commitment to society. Everything we do, we try to do honestly and transparently. We honour our commitments and take responsibility for all our actions. We obey the law, act in accordance with regulations and ensure that our partners and clients can always rely on us.

## ESET Vision

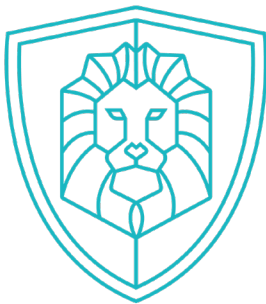
We will enable our users to enjoy the **full potential of themselves and their technology in a secure digital world.**

## ESET Mission

Working with **ethical and passionate** people, we are building a **safer technological** environment for everyone to enjoy. We are doing this through education and our commitment to research and development.

## ESET Values

### COURAGE



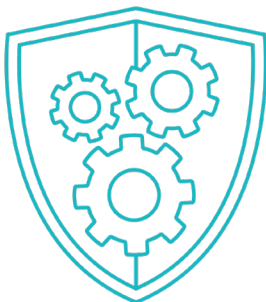
We don't take the easy way. We constantly push boundaries and are determined to make a difference.

### INTEGRITY



We encourage honesty and fairness in everything we do. We have an ethical approach to business.

### RELIABILITY



People need to know that they can count on us. We work hard to live up to our promises, and to build trust and rapport.

### PASSION



We're passionate, driven, and determined to make a difference. We believe in ourselves and what we do.

As employees, we have a strong understanding of ethical behaviour and moral integrity, and understand and comply with the laws, regulations policies, and procedures that apply to our business. ESET's reputation and the trust of its colleagues, business partners, clients and the public depend on each one of us.

Managers lead by example, inspiring and providing guidance to our teams. It is our responsibility to reinforce the importance of understanding and acting in accordance with ESET's mission and values. We encourage employees to raise concerns, especially about potential legal or ethical issues, and we foster a work environment where employees feel comfortable doing so. We listen actively and resolve concerns promptly, appropriately and with empathy.

**When we need to make the right decision about complex issues or handle a challenging situation, we adhere to four basic rules:**

**We demonstrate transparency** in our motives,

**We take the time** to evaluate the situation so that we can make the right choice,

**We ask for help** or a second opinion,

**We learn from mistakes** and commit to taking action to avoid their reoccurrence.

## Company's moral and ethical principles

The moral and ethical principles of ESET group are a set of values and rules that guide the behaviour of ESET, its employees and its management. These principles are important for maintaining the reputation, integrity, and trust between the company and its employees, customers and the public. We expect the company's management and employees, to abide by them. In particular, our company principles include:

- **fairness and equality**
- **legality and compliance**
- **respect for human dignity**
- **diversity, equity and inclusion**
- **freedom and democracy**
- **protection of the environment**
- **integrity and accountability for mistakes**
- **fostering innovation and creativity**
- **lifelong learning**

These moral and ethical principles are not only seen as part of the Code of Ethics and Integrity but are incorporated into ESET's day-to-day operations. Adherence to these principles helps to build trust in the company, maintain our reputation and achieve long-term success.

## The culture of integrity at ESET

All employees of ESET group are committed to working in an honest, ethical and responsible manner. Our business partners and third parties acting on behalf of ESET are expected to uphold and demonstrate the same high standards that we set for ourselves.

We show respect for each other and contribute the establishment of trust in ESET's work and business environment.

Our managers are held to a higher standard in terms of adherence to the ethical principles and values that ESET represents. Managers are not only leaders, but also role models for other team members. Managers have a special role and influence in the company, and we expect them to use this role to promote ethical and professional conduct in all aspects of our business.

We apply the standards of the Code of Ethics and Integrity in different areas of work life that are interconnected and thus create a global and sustainable culture of integrity. These areas of work life encompass **People, Company, External Relations, Society and Planet.**





## People

- Safe workplace for everyone
- Respect and care of each other
- Fulfilling each other's potential
- Embracing diversity, equity and inclusion

## Company

- Creating an enabling environment
- Protecting the assets of ESET
- Ensuring that the company's resources are used appropriately and economically
- Protecting confidential information and personal data
- Safeguarding our brand and reputation



## External Relations

- ESET and its business partners
- Avoiding conflicts of interest
- Fighting against dishonesty
- ESET and the media
- Caution when using social networks
- ESET and public administration

## Society

- Supporting community initiatives
- Nurturing philanthropic partnerships
- Reinforcing employee participation



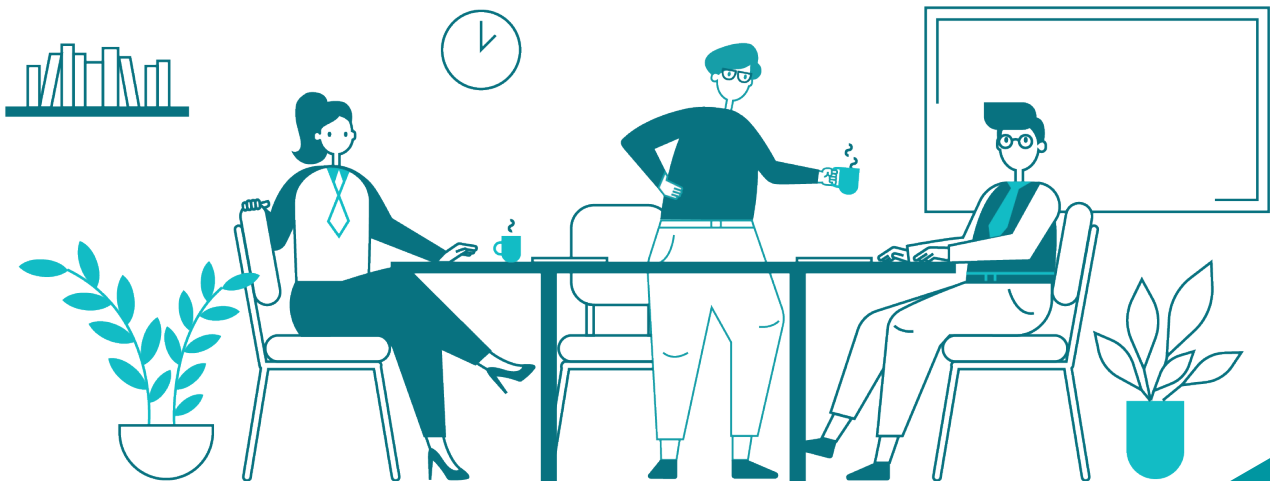
## Planet

- Increasing our resource-use efficiency
- Strategic approach

## Compliance with the law

Acting in compliance with legislation is considered an inherent part of our ethical behaviour, alongside adherence to moral and ethical standards. As employees of ESET, we are responsible for considering the soundness and impact of our decisions and for seeking advice, when required, in order to understand the Code of Ethics and Integrity,

laws, internal regulations, and policies that apply in the local markets where we operate. Should there be a difference between this Code of Ethics and Integrity and local laws or regulations, the more restrictive requirement will prevail.



## Q&A Section

### Why Code of Ethics and Integrity applies globally?

It is important to us to maintain the good reputation of the ESET group worldwide, which is characterized by ethics and integrity and is aligned across our subsidiaries. The Code of Ethics and Integrity articulates our values and principles and defines the desired behaviour of our employees and managers. Integrity helps us live our values and enables us to do what's right for our company, our partners, customers, and each other.

### What if the ESET subsidiary to which I report has more restrictive policies than this Code of Ethics and Integrity?

You should follow the more restrictive policies.



## 2. PEOPLE

**ESET prioritizes fostering an environment where everybody feels secure, respected and supported in a positive co-working environment. The foundation of ESET's culture is built upon mutual respect, trust, empathy, education and inclusion.**

### **We ensure a safe workplace for everyone**

We are committed to creating an environment in which all our employees feel safe and welcome, without exception. Any kind of hostile, disrespectful or intimidating behaviour is not tolerated in the workplace. ESET has zero tolerance for any form of violence or harassment. We make sure that employees' mental health is not harmed through negligent, reckless or intentional behaviour. Managers strive to establish and support psychologically safe team environments that support employees. The security and safety of our colleagues and the facilities in which we work are important to us. We adhere to regulations on health and safety at work, fire hazard, and environmental protection.

### **We respect and take care of each other**

It is the right of every ESET employee to be treated in a respectful, polite and fair manner by superiors and colleagues. We respect the personal lives and individuality of our colleagues and treat each other with respect, regardless of race, skin colour, nationality, origin, gender, sexual identity, religious beliefs or worldviews, political opinion, age, body constitution, physical appearance, or any other basis covered by local laws. We cultivate a caring environment and value the importance of creating an empathetic and supportive professional culture.

### **We constantly strive to fulfil each other's potential**

We foster a strong, collaborative and positive place to work where employees feel encouraged, empowered and energized. We help newcomers in adjusting to the corporate culture at ESET and adapting within the work environment. We enable employees to make the most of the opportunities that come their way. It is the responsibility of every manager to embrace the natural ways in which the employees in their teams work and build on their strengths.

### **We embrace diversity, equity and inclusion**

ESET spol. s r.o. is a proud signatory and ambassador of the **Diversity Charter** and thus we promote diversity management principles and sharing of good practice, and all matters related to employment are based on, and operate, according to the principle of merit.

We value diversity because it is a meaningful way to ensure different experiences and unique worldviews. It enables us to attract and retain the most talented people and helps us to be a more innovative, efficient and creative global company. Our actions are the key to a diverse, equitable, and inclusive working environment. It is the responsibility of all of us, but especially managers, to enhance our awareness of diversity, equity, and inclusion and integrate it as an essential part of our corporate culture.



## Q&A Section

**One of the employees in my team has made a rare mistake that caused a financial loss. What should I, as a manager, do about it?**

It is your duty as a manager to be constructive and help colleagues in your team to resolve any problem and, when needed, organize support from teammates. Of course, it may be necessary to analyse why the issue has occurred and how to do things differently so that it does not happen again. It is also important to be empathetic and take into account the employee's experience at ESET.

**My teammates are telling rude and offensive jokes about another colleague. I find this inappropriate. What can I do about it?**

If you are comfortable doing so, you should speak to your colleagues in private, in a professional manner, and tell them why you feel their comments are inappropriate. If you do not feel comfortable about the situation, you may discuss it with your manager.

**What can I do to support diversity, equity and inclusion as an employee?**

Follow the work of the **ESET Diversity, Equity and Inclusion Council** and understand ESET's diversity, equity and inclusion goals and their connection to our overall company objectives. Take the time to learn about different cultures, races, religions and backgrounds represented by your colleagues. Become culturally competent and treat people in the way they wish to be treated. If you wish to actively engage, you may do so via **Employee Resource Groups**.



## We prevent any form of discrimination

All employees in our company are protected from discrimination based on race or ethnic origin, gender, age, national origin, religion, sexual orientation, gender identity, disability or other personal characteristics. Together, we build a culture in which everyone feels respected, valued and supported. Therefore, we are familiar with the definition of discrimination and its possible forms and manifestations.

**Discrimination** is direct discrimination, indirect discrimination, harassment, sexual harassment and discriminatory retaliation; discrimination is also the instruction to discriminate and incitement to discriminate.

**Direct discrimination** is an act or omission which treats a person less favourably than another person in a comparable situation as the person is, has been or could be treated.

**Indirect discrimination** is an externally neutral regulation, decision, instruction or practice that disadvantages or is likely to disadvantage a person in comparison with another person; there is no indirect discrimination if such a regulation, decision, instruction or practice is objectively justified by the pursuit of a legitimate interest and is reasonable and necessary to achieve that interest.

**Harassment** is conduct that creates or is likely to create an intimidating, hostile, embarrassing, humiliating, degrading, dishonouring or offensive environment and which has the purpose or effect of interfering or is likely to interfere with a person's liberty or human dignity.

**Sexual harassment** is verbal, non-verbal or physical conduct of a sexual nature that is intended or likely to have the effect of violating a person's dignity and that creates an intimidating, humiliating, degrading, disrespectful, hostile or offensive environment. It is conducted without the consent of the other party.

For example, whistling at, groping, ambiguous innuendoes and jokes with sexual overtones, unwanted touching, entering intimate spaces, comments on appearance, sexually suggestive gestures, propositions for sexual intercourse or even sexualised violence may qualify as manifestations of sexual harassment.

**Instruction to discriminate** is an act that consists of taking advantage of an employee's subordination to discriminate against a third person.

**Incitement to discriminate** is persuading, inducing or inciting a person to discriminate against a third person.

**Discriminatory retaliation** is an act or omission which is adverse to the person concerned and is directly related to seeking legal protection against discrimination on their behalf or on the behalf of another person or to giving evidence, giving an explanation or otherwise being involved in proceedings relating to a breach of the principle of equal treatment or a complaint alleging a breach of the principle of equal treatment.

**Mobbing**, also known as workplace bullying or workplace psychological terror, is destructive behaviour that involves repeated and deliberate harassment, intimidation, humiliation or other types of emotional or psychological coercion of an employee in the workplace. Mobbing creates a hostile and unhealthy work environment that can seriously damage the victim's physical and emotional health.

**Bossing** is a term used to refer to a particular type of workplace bullying or inappropriate workplace behaviour in which a manager systematically bullies or humiliates their subordinates. The term is usually used in contexts where a superior abuses his or her position and authority to harass and humiliate subordinates.

Discrimination is a significant violation of our principles of integrity and ethical conduct. Integrity means maintaining honesty, fairness and consistency with core values regardless of the personal characteristics of an individual, person or group. At ESET group, we are committed to ensuring that there is no discrimination in any form.

## **We uphold ESET's values and principles outside of the workplace**

We place great emphasis on our values and principles, which apply to all aspects of our working and interpersonal relationships. They affect not only our activities in the workplace but also our behaviour outside of work hours at company events and in informal meetings with colleagues. It is important for us to exhibit consistent and ethical behaviour in every context.

We represent our company at corporate events and social gatherings in line with our ethical principles. This means adhering to all rules and standards and respecting other attendees.

Informal gatherings with colleagues outside of the work environment can contribute to strong working relationships and team building. Despite their informal nature, we respect each other and abide by the principles of this Code no matter where these meetings are held.

Regardless of location (physical or online) or context, we show respect for all persons and avoid any behaviour that may be unethical or offensive.

Our goal is to build a culture where ethical values and respect for others are a priority not only in the workplace but also in every interaction related to ESET group. Through these practices outside the workplace, we strengthen our company identity and ensure that our values remain strong in all aspects of our operations.



## Q&A Section

### **What situations are considered discrimination or sexual harassment?**

Discrimination and sexual harassment can take many forms, so we try to be sensitive to them. Some manifestations may include, for example, the following model situations:

#### **An employee continues to send unwanted propositions to a colleague via work email, despite their requests to stop.**

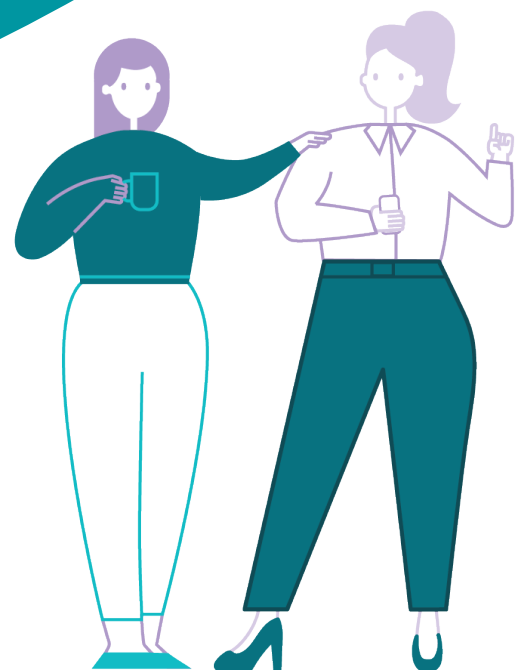
This is unwanted sexual attention in the workplace. This behaviour creates discomfort and affects work performance. It is unacceptable even if the recipient of such attention does not disagree, in the spirit of the principle of “unspoken disagreement is not consent”.

#### **During a company party, a colleague repeatedly harassed a colleague with sexual remarks and pressured them to drink alcohol.**

This is sexual harassment, and although it occurred at an informal event and outside of the office, such conduct is a violation of this Code of Ethics and Integrity and adversely affects working relationships and well-being at work.

### **An employee publicly makes inappropriate comments about people of a different sexual orientation both inside and outside the workplace.**

This is discrimination on the grounds of sexual orientation. Such behaviour creates a hostile working environment and damages the reputation of the company. Discrimination based on race or ethnic origin, gender, age, national origin, religion, sexual orientation, gender identity, disability or other personal characteristics is unacceptable and is considered a violation of this Code.



## 3. COMPANY

**We are proactive in the protection of property, technology and information, and understand our responsibility for safeguarding our brand and reputation.**

### **We create an enabling environment**

We do our best to create an energetic and dynamic working environment that encourages employee engagement, innovation and collaboration. We value open communication, diversity of ideas and perspectives, and a common sense of understanding. Managers develop, motivate and support their teams.

### **We protect the assets of ESET**

We use physical and electronic assets carefully and responsibly. We protect the devices and communication systems entrusted to us by the company and use them responsibly. We do not use, download or share inappropriate content or use our systems for illegal purposes or to do harm.

We protect ESET assets in accordance with ESET policies, guidelines and standards, and continuously identify, assess and mitigate quality, security and business continuity risks affecting ESET assets.

We care about the protection of all aspects of our digital life. Based on more than 30 years of experience and innovation we continue enhancing our ability to predict, prevent and swiftly mitigate cyberattacks and keep our devices secure. Our employees are regularly trained and are acquainted with internal security policies, standards and procedures.

We understand that the protection of ESET assets helps us to protect the ESET brand and maintain sustainable business relationships with our partners and customers.

### **We protect confidential information and personal data**

We treat the intellectual property and sensitive information of ESET group in an appropriate manner and proactively protect it

from loss, theft or disclosure.

We take all necessary steps to maintain the confidentiality of information belonging to ESET group, we handle them in accordance with internal regulations and applicable laws, and protect them from unauthorized access or disclosure.

We process and protect the personal information of our employees, customers and business partners in compliance with the law and ESET group policies.

### **We ensure that the company's resources are used appropriately and economically**

Intelligent use of resources is one of our core interests. We understand that reducing costs, improving efficiencies and boosting productivity leads us to our desired results. It is the role of every manager to ensure the right resources are available at the right time for the right work.

### **We safeguard our brand and reputation**

We are responsible in the use of ESET group's business name, logo and trademarks in line with internal policies and manuals and we preserve and enhance ESET group's reputation.

We leave any kind of public disclosures about ESET group and its business to colleagues and professionals who have the authority to speak as representatives of the company. We value objective and verified information, and we avoid publishing of fake news or hoaxes.

## Q&A Section

### **An employee in my team has caused a security incident. What should I, as a manager, do about it?**

ESET, as a digital security company, bears the critical responsibility of protecting millions of customers and thousands of businesses worldwide. Thus, in the event of a security incident it is every employee's duty to contact the Internal Security team and cooperate with the incident response team during its resolution. The security incident response process is primarily focused on protecting the employees, partners, and customers of ESET, as well as their data. This process also identifies the root cause and responsibility for the security incident. Once your subordinate is confirmed as having caused the incident, a disciplinary process is started. The disciplinary process shall be respectful and fair, and the consequences shall be appropriate to the damage caused. The manager's responsibility is as follows:

- **for minor security incidents** – to be informed about the security incident and formally go over the security incident with the subordinate in order to prevent its reoccurrence in the future
- **for major security incidents** – to be involved in decision-making with the HR and legal departments about what disciplinary actions are to be applied in line with applicable laws.

### **I need to share a document that contains personal data. How should I do this properly?**

Always use a secure method approved by ESET. One of these is sharing through OneDrive's Share function and specifying access in Link Settings. You can always contact your local IT support team for advice.

### **ESET organized a great end-of-year party. I took a couple of wonderful and funny pictures of my colleagues. Can I post them on my social network?**

This action falls into the category of private activities. However, it is recommended to publish photos or recordings of your colleagues only with their approval.



## 4. EXTERNAL RELATIONSHIPS

**We adhere to ethical principles in our business and business partnerships and under no circumstances engage in unfair commercial practices, any form of bribery or corruption. We want to contribute to social and economic development through fair competition in the market and refuse to work with any group, organization or individual engaged in unlawful activities.**

### ESET and its business partners

We build and maintain transparent relationships with our business partners. We respect competition laws and do not take part in collusion, cartels or any similar activities with other companies within our industry.

We do not exchange sensitive information on calculations, e.g. of prices, margins, costs or market share, with our competitors.

We consider very carefully and in compliance with this Code of Ethics and Integrity any act concerning occasional symbolic or promotional gifts, as well as business lunches and dinners, parties, or invitations to other events. We do not provide, promise or accept any gifts or hospitality in cases where we are involved in a current tender or negotiation process, or if it could create an obligation on our side or on the side of the other party.

ESET complies with various laws regulating international trade, including export control and sanctions. Export control governs the conditions or prohibitions on the export of certain products, technologies, or software. Sanctions prohibit specific commercial or financial relationships with various individuals, entities, or government organizations.

As with other topics within this Code of Ethics and Integrity, we stick to the rules when considering the topics described in this section: we stay transparent, take time to assess the issue and ask for help, and if in doubt, we turn to the legal department in a given ESET subsidiary or the legal department at ESET HQ.

### We avoid conflicts of interest

We avoid conflicts between the interests of ESET group on the one hand, and our private interests on the other. If there is any potential conflict of interest or doubt about whether a conflict of interest exists, we will deal with this by consulting with or informing either the local legal department or the legal department at ESET HQ as quickly as possible. If you need advice on how to proceed in such a case, please visit the section "Raising a Concern or Notifying a Breach of the Code of Ethics and Integrity" at the end of this document.

### We fight against dishonesty

We do not abuse the powers with which we are entrusted for personal gain. We do not misuse the authority arising from our work position.

We do not offer or accept unjustified benefits, personal cash contributions or bribes, either directly or indirectly (e.g. through distributors, resellers, consultants, mediators or agents). We avoid even the suggestion of dishonesty and unfairness in our business dealings.

We do not provide donations or other benefits to officials, politicians, political parties or other public officials whose independence might be questioned in consequence.

Within ESET, we can provide sponsorship to individuals or legal entities, or support publicly funded activities, but only after careful consideration of the circumstances and respecting all regulations and the need for transparency. ESET never provides sponsorship or funds to political parties or candidates.



## ESET and the media

We leave the responsibility for communication with the media in the hands of colleagues and professionals entrusted with this job. We are proponents of clear, accurate and consistent communication with the media.

ESET communicates exclusively through its official profiles on selected social networks managed by social network communication specialists. The topic of internet security is crucial for us. All our employees shall behave in such a way that everyone feels safe on the internet. Although every employee communicates on social networks as a private person, we are also ambassadors of the company in the real and virtual world. We believe that on social networks and elsewhere each of us will behave with respect towards others and their opinions, and that we will follow the rules of decent behaviour and netiquette. If you are not sure how to behave on social networks in specific cases, contact your local communications manager.

## Caution when using social networks

Social networks are an important part of the modern communication world, allowing us to express our opinions and interact with our personal and professional environment. Our use of social networks reflects ESET's ethical values and moral standards.

Each of us who is associated with our company's name on social media has a responsibility to ensure that our behaviour on these platforms does not reflect negatively on ESET group's reputation. Avoiding statements or behaviour that could damage our company or our colleagues is absolutely essential. We are more cautious when sharing information, and expressing ourselves on public platforms and have a greater responsibility to maintain ethical and professional standards when we are associated with our company's name.

We distinguish between personal and professional social networking accounts. ESET employees are aware that what they post on their personal accounts may be perceived as a statement of the company's position.

Our goal is to promote healthy and open communication, which requires us to be aware of the impact our words and actions have on our company and our colleagues. Adhering to these standards will help us maintain ESET group's positive reputation and ensure that our use of social networks is consistent with our ethical values.

## ESET and public administration

We strive to maintain a relationship with any public authorities based on the principles of openness, cooperation, and transparency, ensuring the protection of our interests and rights. Communication with public administration bodies is carried out only by designated employees, to the extent stipulated by the power of attorney or internal regulations. In case of any ambiguity, we consult with the legal department of the ESET subsidiary or the legal department at ESET HQ.



## Q&A Section

**I am the business owner of a task that requires a vendor selection procedure. Shortly after the vendor selection process began, one of the potential vendors called to request a personal consultation on the scope of the vendor selection criteria. What should I do?**

Do not provide individual consultancy to potential vendors participating in a selection procedure. To maintain transparency, you must refer the potential supplier to a representative of the procurement department of the ESET subsidiary, if available, or to a representative of the procurement department at ESET HQ, responsible for processing the tender.

**I am a sales representative and have just noticed that a customer has ordered a product that they do not need. They handle emails in a way that means there is no point in their buying the software in question.**

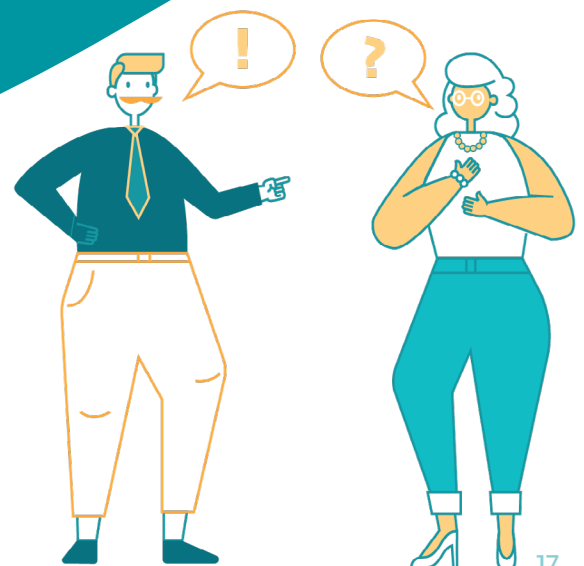
You should explain to your customer why you think the solution is not appropriate for them. It will probably result in their removing the item from the order, but heightened credibility among our customers and partners based on genuine honesty and integrity is more important. We strive to reach our company goals through honourable conduct.

**I came across a social media post that attacks or misrepresents ESET. What should I do?**

Inform the colleagues who are in charge of the company's communication in the given country or region about the post. For misleading or hateful posts, you can use the functionality of the given social network to report content that violates its community standards or guidelines.

**What online behaviours are inconsistent with ESET group's values and may lead to violations of this Code of Ethics and Integrity or have legal implications?**

- Discriminatory statements
- Statements containing any form of sexual harassment
- False information and defamation, which includes spreading false information about colleagues or the company, spreading unverified information and conspiracy theories
- Statements that incite hatred, racism, extremism or violence
- Sharing confidential information about the company or the company's clients



## 5. SOCIETY

We feel the responsibility to drive social change in key issues that matter to our community, and feel passionate about initiatives that benefit our society. ESET group has a strategic approach to environmental, social and governance issues encompassing initiatives, philanthropic partnerships and volunteering programs, particularly in the field of digital skills education, science, technology and innovation, diversity, equity and inclusion, and environmental sustainability. Every one of us is encouraged to be proactive in making positive changes. However, when we engage in community initiatives, we should be mindful of ensuring our activities achieve positive changes in society. Each one of us can participate in community initiatives on a personal level too, while ensuring that our activities are in accordance with the law.

### We support community initiatives

We believe that bringing together business and community makes society thrive and grow, and also benefits those who are more vulnerable and in need. We feel rewarded when we succeed in making a positive impact on communities and bringing about sustainable development in society.

### We nurture philanthropic partnerships

Making a difference requires the positive engagement of individuals and entities, including NGOs in philanthropy, in order to support learning, build trust and relationships, and facilitate interested parties and beneficiaries in sharing their views, values and concerns. ESET group supports those who want to achieve more in philanthropy, provides them with resources to make informed decisions, and builds a cultural environment around philanthropy.

### We reinforce employee participation

We share an altruistic desire to improve human welfare and the environment we live in. Each one of us has the opportunity to engage in initiatives that benefit society in harmony with our own time, interests and beliefs. ESET group affords flexibility around schedules and locations to enhance enthusiasm and commitment among us.



## Q&A Section

**I feel pressure from my team to engage regularly in volunteering activities, but I am struggling to organize my work and family life along with these. What should I do?**

ESET does its best to create different opportunities and reasonable flexibility for employees who feel passionate about volunteering, and we encourage them to get engaged. Volunteering can be time-consuming. Be honest with yourself, your colleagues and your family about how much time you can invest without dropping the ball in other areas that are more important to you.



## 6. PLANET

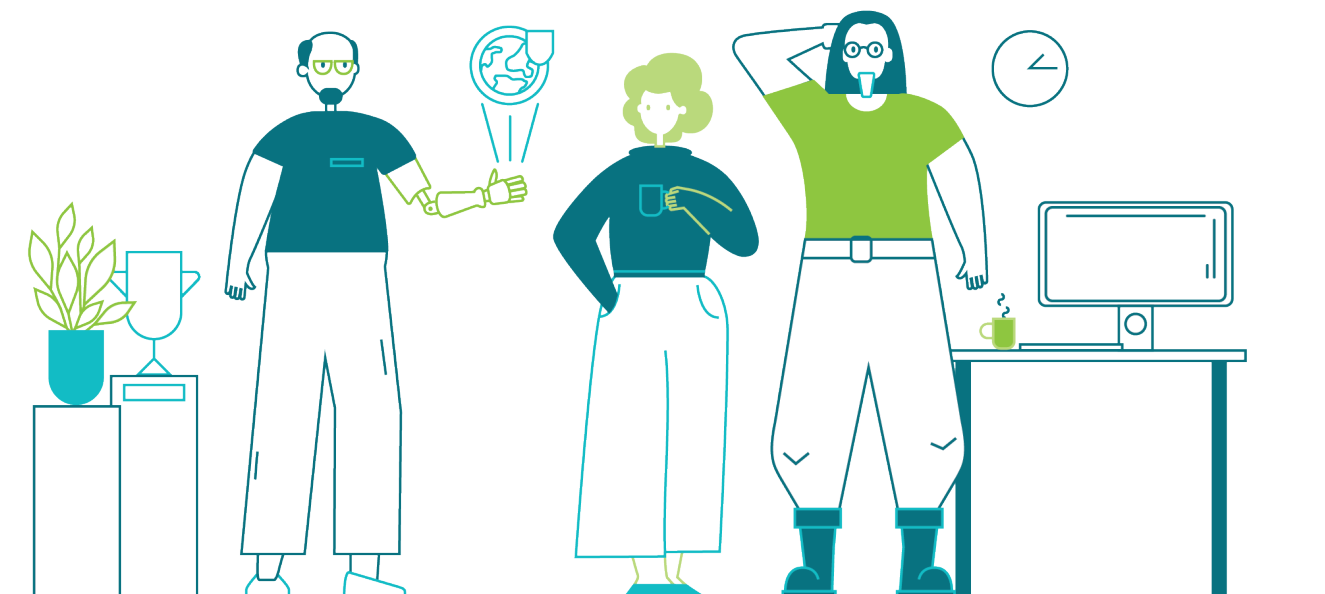
A healthy planet is necessary for healthy people and healthy businesses. We are aware of the environmental threats, and the impacts of our behaviour on the planet, and feel the responsibility to limit environmental damage. We work towards reducing our CO2 emissions, energy consumption and waste production. We learn and implement the best practices. ESET group supports employee resource groups and implements innovative approaches on how to educate ourselves as responsible individuals. The strategic approach of ESET group to sustainable development helps us to be more effective in taking actions towards environmental sustainability.

### We gradually increase our resource-use efficiency

We consider carefully what we buy, what can be reused, how we can reduce consumption, and ensure that we dispose of items with care. Each one of us takes responsibility for our actions by sticking to the **4Rs – refuse, reuse, reduce and recycle waste** in the workplace. We save water, electricity and other resources. We carefully choose our suppliers and consider them to be crucial partners in reducing our environmental footprint. We prefer environmentally friendly goods and services and seek a balance between efficiency and sustainability.

### Strategic approach

ESET group implements new best practices that allow us to reduce the impact that our activity has on the environment. We measure, analyse and systematically reduce our greenhouse gas emissions towards zero-carbon solutions in accordance with the Paris Agreement, and European Green Deal. ESET group takes a strategic approach to sustainable development with an interest in achieving CO2 neutrality by 2050.



## Q&A Section

### **A colleague of mine has a more efficient computer than me. Do I have the right to request the same?**

Our company always listens to the needs of its employees and is willing to go the extra mile by providing the necessary tools for an efficient and productive work environment. However, your happiness and satisfaction in the workplace should not be driven by comparing what you have to others in the company. Think of how much you really need a new computer and make a sound decision with respect to the environment.

### **How do we measure the greenhouse gas emissions of ESET?**

The first CO2 report was published for 2019/2020 and set the baseline for measurements of the greenhouse gas production of ESET group offices in Bratislava. In 2022, a comparative report for Bratislava and an additional CO2 report for our offices in Žilina and Košice were finalized. In 2023, the ESET Group Carbon Footprint Report 2022 was released. By 2030 we will design the methodology and processes to measure and reduce our carbon footprint in all ESET group offices worldwide.

### **What is expected from me as an employee?**

To think of the bigger picture and promote environmentally conscious practices in the workplace, such as recycling, reusing, using alternative modes of transportation where possible, saving energy, preferring paperless work, preferring green vendors, etc. There are many small actions that each one of us can take to create an environmentally friendly workplace. Anyone can get involved in ESET group's environmental vision, either through environmentally conscious behaviour or by actively volunteering or joining Employee Resource Groups.





## 7. RAISING A CONCERN OR NOTIFYING A BREACH OF THE CODE OF ETHICS AND INTEGRITY

If there is a question or concern about how this Code of Ethics and Integrity, or ESET's policies, regulations and procedures, or local laws apply to our actions or those of others, seek guidance before you act. The best place to start is your manager. If it is not possible to raise the issue with your immediate manager or another member of management, or the dispute needs additional perspective, it is possible to consult with dedicated staff at the local or regional level.

If you suspect that someone is behaving illegally or unethically it is appropriate to approach the dedicated staff according to the nature of the concern: the local or regional HR department in case of interpersonal issues; the local or regional legal department in case of questions or doubts concerning the law; or other appropriate contacts that are relevant for your country or region.

**An announcement of a violation of the law or of this Code of Ethics and Integrity can be submitted by e-mail at [compliance\\_line@eset.com](mailto:compliance_line@eset.com).**

In addition to reporting violations of this Code of Ethics and Integrity, ESET group also accepts whistleblowing complaints. Whistleblowing may be subject to specific legislation in each country and may therefore be dealt with separately in accordance with the laws in force in that country. Further information on this topic can be obtained by contacting the legal department of an ESET subsidiary or the legal department at ESET HQ.

### Confidentiality and prohibition on retaliation

ESET group encourages employees to raise their concerns and makes every effort to ensure confidentiality consistent with the need to investigate and address each issue.

The notifier is protected against discrimination or any kind of retaliation in association with reporting a violation of this Code of Ethics and Integrity, but notifications can also be made anonymously.

### Consequences for violation of this Code of Ethics and Integrity

In case of a violation of the Code of Ethics and Integrity, ESET group may impose consequences in accordance with legal possibilities and regardless of the employee's position in the company. In case of damage caused to ESET group as a result of a violation of the rules set out in the Code of Ethics and Integrity, compensation for damages may be enforced in compliance with the applicable law.

This Code of Ethics and Integrity constitutes an internal regulation of ESET group and is binding for ESET group and all its employees. Violation of this Code of Ethics and Integrity is a breach of work discipline and may have employment consequences, up to and including termination of employment.



