



# | Code of ethics



ENJOY SAFER TECHNOLOGY™

A teal-tinted photograph of two men. The man on the right is in the foreground, looking slightly to the right with a serious expression. The man on the left is partially visible, looking towards the camera. The image has a soft, cinematic quality. Overlaid on the bottom half of the image is the text 'COURAGE INTEGRITY RELIABILITY PASSION' in a bold, white, sans-serif font, arranged in four lines. The text is set against a dark teal background that matches the overall color scheme of the image.

**COURAGE**  
**INTEGRITY**  
**RELIABILITY**  
**PASSION**





# Code of Ethics and us

We, employees of ESET, have strong understanding of ethical and moral behavior as values important not only at home but also at work and business. Good name of ESET and trust of our colleagues, business partners, clients and the public depends on each one of us.

The Code of Ethics helps us to make right choices and act in accordance with the values of the company, and that is the reason why it is binding for all of us. The main objective of Code of Ethics is to emphasize the necessity for mutual respect and trust in working and business environments. Nevertheless, the Code of Ethics can be fulfilled in everyday life only by us, employees, by day-to-day compliance.

# 01

## Our values are the foundation

The Code of Ethics is founded in our company values and defines what behavior we expect from our employees, so we can feel good at work.

Everything we do, we try to do honestly and transparently. We honor our commitments and take social responsibility for all our activities. We always act in accordance with law and our partners and clients can always rely on us.



**COURAGE**



**RELIABILITY**



**INTEGRITY**



**PASSION**

# 02

## At work, we respect each other

We are all entitled to get fair and polite treatment from our superiors and colleagues. We respect the personal sphere of our colleagues and treat each other with respect regardless of race, skin color, nationality, origin, gender, sexual identity, religious beliefs or worldviews, political opinion, age, body constitution or physical appearance.

We believe bullying does not belong to personal life, nor to workplace. This also applies to any kind of mobbing and bossing. Any harassment, including sexual, is strictly prohibited.

**Bullying** is understood as unjustified and malicious overloading of a person, creating obstacles for a person, harassing, humiliating or abusive behavior towards a person, from an individual or a group, which may be manifested by physical or psychological harm.

**Mobbing** refers to the most varied forms of creating hostile work environment. It refers to attacks from a group of people against an individual. Distinctive signs of mobbing include latency, shiftiness and viciousness.

**Bossing** refers to psychological bullying in workplace performed by a superior employee towards his or her subordinate. It refers to behavior of the superior employee who humiliates his or her subordinate in front of his or her colleagues, purposefully making his duties difficult or impossible.



## 03 We respect the rules

Acting in compliance with the legislation is also an inherent part of ethical behavior, alongside to adherence to moral and ethical standards. We comply not only with the national legislation of Slovak Republic but also with internal regulations of ESET.

*In the past, adherence to legislation has prevented not only potential economic damage but also the degradation of ESET's good name. ESET's good name is directly influenced by the presentation, conduct and behavior of each employee. Behavior of even one employee, evaluated as inappropriate may cause ESET significant economic or reputation damage.*

# 04

## We protect Confidential Information and Personal Data

We maintain confidentiality about ESET's business and its business partners.

*If part of our job is that we have access to confidential information about ESET or its customers, suppliers, advisors or other business partners for which information an internal classification is set up, we treat them in accordance with the Policy on Information Classification and, to the extent intended by the directive we protect them from unauthorized access by third parties. Equally, we also maintain reasonable confidentiality to all such data, the nature of which appears to be confidential, even though they are not marked as so.*

We protect personal information of our colleagues, customers and business partners of ESET.

*If part of our job is that we have access to personal data of individuals, whether personal data of ESET employees, jobseekers, business partners of ESET or ESET customers, we obey and maintain confidentiality towards them. We only handle personal data in accordance with instructions given by a superior and in accordance with mandatory guidance and the Personal Data Protection Directive.*





## 05 We are fair in business

As business partners, we support and always obey the rules of fair economic competition which prohibit, for example:

- Pricing agreements
- Capacity agreements
- Market share agreements
- Division of regional markets
- Customer allocation
- Preserving prices
- Submitting fake offers in tenders
- Abuse of a dominant market position.

We know that informal conversations on these topics can also be misinterpreted and therefore we do not want to evoke even the impression of unfair competition.

Calculations, e.g. of prices, margins, costs, market shares and capacities cannot be, in any case exchanged with our competitors. In case of questions and doubts, the legal department will help us.

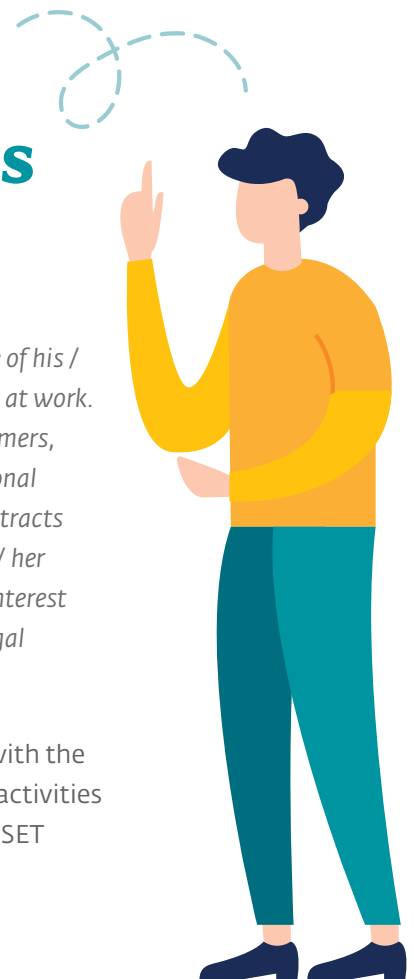
*Occasional symbolic or promotional gifts, as well as business lunches and dinners, parties, or invitations to other events, if their value is reasonable and they do not aim to unfairly influence business decisions (e.g., not given or available at the time or in connection with negotiation of a new contract or its adjustment for a further period) are in compliance with the Code of Ethics*

## 06 Conflict of Interests

We avoid conflicts between interests of ESET and our private interests.

*A conflict of interests may arise, for example, if an employee or one of his / her relatives is involved in activities that affect his / her objectivity at work. Such activities may include, for example, side activities with customers, suppliers, service providers and competitors, or financial and personal interests in any of these groups. No employee may give private contracts to companies with whom he or she cooperates in the course of his / her employment if he / she can benefit from it. If there is a conflict of interest or there's a doubt about it, we will deal with it by informing the legal department.*

Secondary employment of an employee cannot conflict with the interests of ESET, especially when performing secondary activities for competitors as well as competing activities towards ESET or activities which the employee does for ESET.



## 07

# ESET and Public Administration

We always strive to maintain a relationship with all public authorities that is characterized by openness of cooperation and transparency, while respecting our interests and rights. Communication with the public administration is carried out only by designated employees, to the extent stipulated by the power of attorney or internal rules in cooperation with the legal department.

*It is necessary to immediately contact the legal department in case of contact with specific authorities, which are responsible for investigating violations of the current legislation and sanctioning them (e.g. the Police Force of the Slovak Republic, the Prosecutor's Office, the supervisory authorities in the field of data protection, economic competition protection, etc.).*

## 08

# We fight against corruption

We do not offer unjustified benefits, either directly or indirectly (through consultants, mediators or agents), we do not offer or accept personal cash contributions, bribes or other benefits. We avoid even the hint of dishonesty and unfairness in our business.

ESET and its employees do not provide donations nor 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 circumstances and with respect to all regulations and transparency.

Even in the case of a sponsorship, it is always necessary to comply with the rules. All contributions must be transparent. The recipient, subject and purpose of use must be documented in writing.

*Transparent provision of a contribution to support an election campaign, etc., for example through a transparent account of a candidate, by employees of ESET as individuals is permitted.*





**09**

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

We treat the property of ESET responsibly, carefully and sparingly.

We protect the entrusted company devices and do not use them for private purposes unless it is internally modified otherwise.

ESET maintains accurate records of its financial accounts, including employee costs. Employees must not report false or fictitious records or accept and make unrecorded payments.

**10**

## **Occupational Health and Safety, Fire Protection and the Environment**

We believe health is in the first place.

Safety at work is more important than the work itself, therefore we adhere to regulations on safety and health at work, fire protection and environmental protection.

We try to avoid or limit any environmental damages. We save water, electricity and other sources. We recycle waste by using separate containers available at the workplace.



## 11 | Lead by Example

We are aware of the fact that each of us is responsible for fulfilling the Code of Ethics. Management and superior employees serve as an example for us in their everyday work. Therefore, their adherence to the Code of Ethics is of a key importance, and thus stricter rules apply to the evaluation of their misconduct.

## 12 | Notification of Breach of the Code of Ethics

Code of Ethics can have an impact only if we all comply with it. Therefore, it is necessary to prevent its violation. Announcement of a violation of the Code of Ethics can be made by email at [whistleblower@eset.sk](mailto:whistleblower@eset.sk), by post or personally at our HR or Legal Departments. The notifier is protected against discrimination or termination of his/her employment in association to notifying of a violation of the Code of Ethics, but the notification can also be made anonymously.



## 13 | Compliance with the Code of Conduct

ESET expects from all employees to behave in accordance with the Code of Ethics.

Violation of these rules, laws, internal directives, and regulations can have serious consequences not only personal for the individual who breached them, but for ESET as a company in general.

In case of violation of the Code of Ethics ESET draws consequences in accordance with legal options consistently and without regard to the position of the employee in the company. In case of damage caused to ESET due to violation of the rules set out in the Code of Ethics, compensation for the damage will be enforced in accordance with the Labor Code and internal regulations.



## **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.



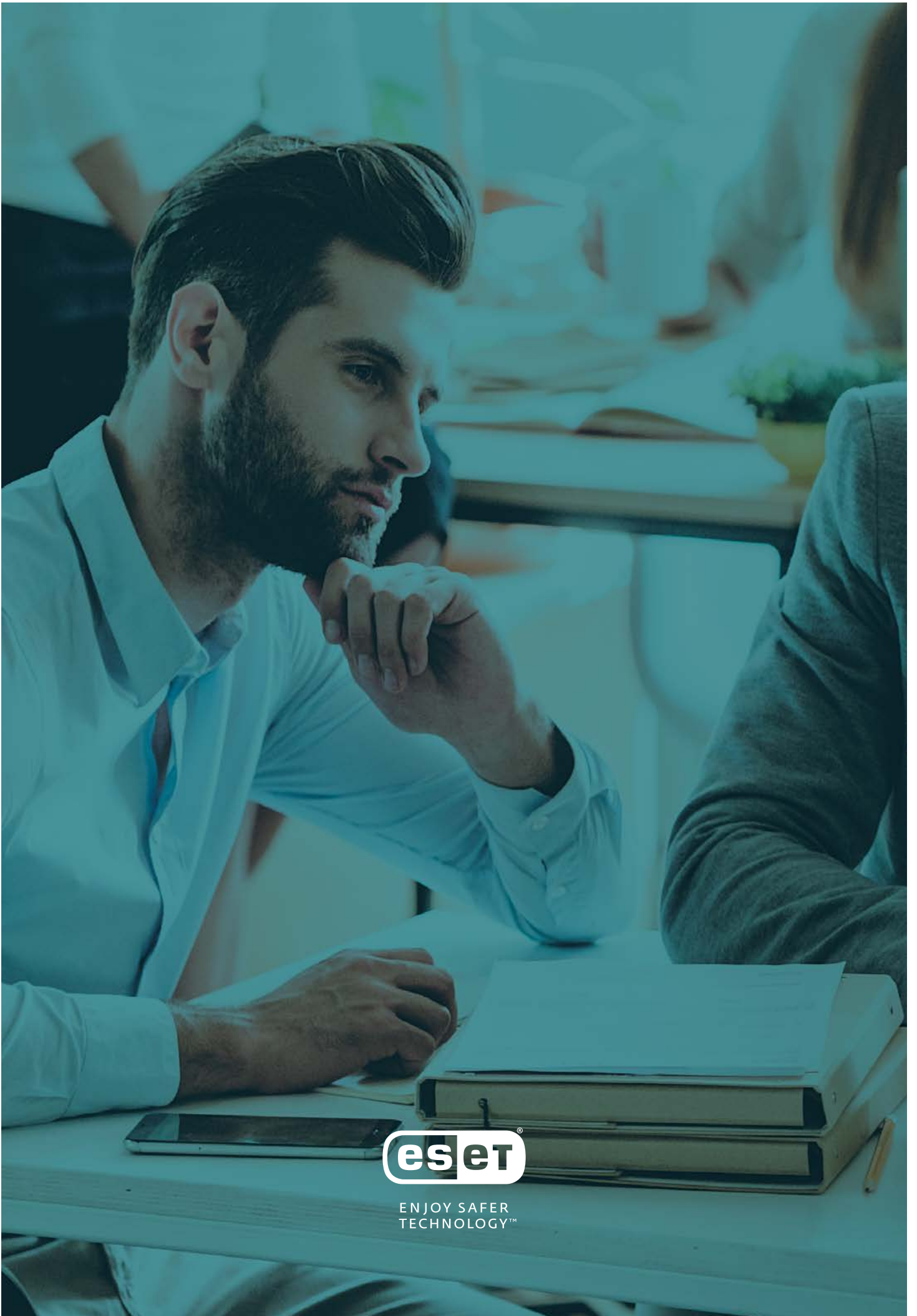
## **Reliability**

People need to know 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 difference. We believe in ourselves and what we do.



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