



SUPPLY CHAIN AND BUSINESS PARTNER **CODE OF CONDUCT**

Introduction

Check Point Software Technologies Ltd. is a leading AI-powered, cloud-delivered cyber security platform provider protecting over 100,000 organizations worldwide. We are committed to ensuring that the working conditions in our operations, as well as those of our suppliers and business partners, are safe, and that all business activities are conducted ethically, responsibly, and with full consideration of environmental impacts. This Supply Chain and Business Partner Code of Conduct (“Code”) outlines our expectations for our suppliers and business partners to comply with these principles, including among their personnel and subcontractors.

This Code promotes ethical conduct, safe working conditions, the protection of sensitive information, the treatment of employees with respect and dignity, and environmentally responsible practices. In addition to the principles outlined in this Code, we expect our suppliers and business partners to adhere to all applicable laws and regulations, as well as internationally recognized standards¹, including the articles set out in the Responsible Business Alliance Code of Conduct and the International Bill of Human Rights².

Beyond the principles outlined in this Code, our hardware suppliers are expected to comply with regulations and certifications detailed in Annex A of this Code.

Compliance with this Code and the Applicable Laws and Regulations

Our suppliers and business partners are expected to comply with this Code as well as with all applicable laws and regulations, including domestic laws in the territories where they operate. This includes regulations and standards related to anti-corruption, anti-money laundering, environmental protection, modern slavery, labor rights, social responsibility, health and safety, export and import controls, data privacy, and information security.

Check Point reserves the right to audit and monitor suppliers’ and business partners’ compliance with this Code and with the applicable laws and regulations.

¹ With reference to: [the OECD Guidelines for Multinational Enterprises](#); [the UN Guiding Principles for Business and Human Rights](#); [the ILO Declaration on Fundamental Principles and Rights at Work](#); and [the ILO Fundamental Conventions](#).

² [Responsible Business Alliance Code of Conduct](#) and [the International Bill of Human Rights](#)

Ethics and Legal Compliance

Business Integrity: Anti-Corruption, Bribery, and Money Laundering

We have a zero-tolerance policy for any form of corruption, bribery, extortion, or embezzlement. Our suppliers and business partners shall comply with all applicable anti-corruption, anti-bribery, and anti-money laundering laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the anti-corruption provisions of Israel's Penal Law, and the OECD Anti-Bribery Convention. We expect our suppliers and business partners to uphold anti-corruption policies and to implement programs to verify their compliance with these principles.

Furthermore, our suppliers and business partners shall not engage in the following activities:

- Corruption of government officials in any form;
- Payments of bribes of any kind (whether in dealings with public officials or private individuals);
- Any payment or other compensation to a Check Point representative, which was not authorized by Check Point, in accordance with our Code of Ethics and Business Conduct; and
- Any undisclosed commissions (or a commission in excess) to a third party for obtaining any business with Check Point.

Our suppliers and business partners shall promptly report any suspected violation of the above principles. Reports can be made to the channel provided in this Code in the "Contact Information for Reporting and Raising Concerns" section below.

Record-Keeping and Documentation

Suppliers and business partners are expected maintain accurate and complete records of all transactions in accordance with applicable laws and regulations. These records must accurately reflect the nature of the transactions and be available for inspection. Falsification of records or misrepresentation of conditions or practices in the context of business relations is strictly prohibited.

Conflicts of Interest

Suppliers and business partners shall avoid conflicts of interest that could compromise their objectivity or Check Point's interests. Conflict of interest situations may occur when personal interests interfere with professional obligations to Check Point.

Examples of potential conflict-of-interest situations include:

- Promoting a personal interest or making business decisions based on personal relationships; and
- Having familial or personal relationships with Check Point employees that are not disclosed or documented by the organization.

Suppliers and business partners are expected to disclose any situations that may reasonably be perceived as a conflict of interest through the channel provided in this Code in the “Contact Information for Reporting and Raising Concerns” section below.

Insider Trading

Suppliers and business partners shall comply with all laws and regulations regarding insider trading and securities. Suppliers and business partners with access to non-public information regarding Check Point shall refrain from using or sharing that information for trading purposes.

Fair Business, Advertising, and Competition

Suppliers and business partners shall comply with all applicable fair business, advertising, competition, and anti-trust laws and regulations. Suppliers and business partners should avoid any conduct that may harm competition, fair trading, or involve deceptive marketing and sales practices.

Compliance with Export and Import Laws

Suppliers and business partners shall comply with all applicable export and import laws and regulations, including those imposed by the U.S. Government. This includes adhering to relevant and current economic sanctions, trade laws, and embargoes.

Labor and Human Rights

Freely Chosen Employment and Anti-Slavery Commitment

Our suppliers and business partners shall ensure and monitor compliance with relevant labor laws and regulations. Forced, bonded, or indentured labor, involuntary prison labor, slavery, or human trafficking in any form is prohibited. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. Suppliers and business partners shall not restrict workers' freedom of movement or access to their identity documents. Suppliers and business partners shall not charge their employees with recruitment fees in connection to their own employment.

Child Labor Prohibition

Suppliers and business partners shall not employ workers under the minimum age for employment as defined by international standards³ or as outlined in applicable local laws, whichever is higher. In alignment with the applicable international conventions, workers under the age of 18 must not perform work that is likely to jeopardize their health or safety.

Working Hours

Suppliers and business partners shall comply with applicable local laws and regulations regarding working hours and rest days. Suppliers and business partners are expected to comply with the Responsible Business Alliance Code of Conduct's standards on maximum workweek hours, including overtime, except in emergency or unusual situations or when permitted by local laws or workers' agreements. Furthermore, and according to the RBA standards, employees must be allowed at least one day off per seven-day week.

Wages and Benefits

Suppliers and business partners shall ensure that wages paid for regular and overtime work comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Deductions from wages as a disciplinary measure are not permitted. Suppliers and business partners shall provide workers with clear and timely wage statements for the work they have performed.

Anti-Harassment, Anti-Discrimination, and Fair Treatment

Suppliers and business partners shall maintain a business environment that is free from harassment, discrimination, and unlawful treatment, ensuring all workers are treated with dignity and respect. Discrimination in hiring and employment practices based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity, national origin, religion, disability, pregnancy, parental status, union membership, political affiliation, veteran status, protected genetic information, or marital status, or any other protected class is strictly prohibited.

Harassment, including sexual harassment, bullying, abuse, violence, corporal punishment, mental or physical coercion, public shaming, or verbal abuse, is also prohibited. Suppliers and business partners shall have clear processes in place for employees to raise concerns without fear of retaliation. Furthermore, they are expected to provide equal opportunities and promote workforce diversity and inclusion.

³ With reference to the ILO Declaration on Fundamental Principles and Rights at Work (1998), ILO Convention No. 138, and ILO Convention No. 182 on the Worst Forms of Child Labor (1999).

Freedom of Association and Collective Bargaining

Suppliers and business partners shall respect the rights of workers to associate freely, bargain collectively, and engage in peaceful assembly. Workers should be able to communicate openly with management regarding working conditions without fear of retaliation, harassment, or intimidation.

Health, Safety, and Quality Management

Suppliers and business partners shall provide a safe and healthy working environment for their employees. This includes identifying and mitigating occupational health and safety hazards, providing appropriate personal protective equipment, and ensuring proper maintenance and use of safety equipment. Suppliers and business partners shall also have procedures in place for emergency preparedness, occupational injury and illness tracking, and corrective action implementation. In addition, suppliers and business partners shall provide necessary training and resources on health and safety measures to employees and perform audits and inspections regarding health and safety performance, when necessary.

Responsible Sourcing of Minerals

Suppliers and business partners shall comply with all applicable laws and regulations, including Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, regarding the sourcing of materials, including conflict minerals that are necessary to the functionality or production of our products. If and to the extent that these regulations and requirements are applicable, we expect suppliers and business partners to exercise due diligence on the source and chain of custody of these minerals to ensure that they do not directly finance or benefit armed groups. Such suppliers and business partners are expected provide us with reports and declarations on the sourcing of said minerals in compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.

Environment

Suppliers and business partners shall conduct their operations responsibly and in compliance with all applicable environmental laws and regulations, including those related to hazardous materials, air emissions, waste, and water management. Additionally, suppliers and business partners shall obtain and maintain all required environmental permits, approvals, licenses, and registrations required by the applicable laws and regulations.

Suppliers and business partners are strongly encouraged to engage in efforts to reduce their environmental impact, including minimizing the use of hazardous substances, reducing energy, water, and natural resource consumption, monitoring and reporting on their carbon emissions, and implementing pollution prevention measures. Suppliers and business partners should strive to use environmentally conscious components and adopt sustainable practices throughout their operations. This aligns with our commitment to achieving Carbon Neutrality across our operations by 2040.

Intellectual Property, Confidentiality, and Privacy

Intellectual Property Protection

Suppliers and business partners shall respect and protect all intellectual property rights related to Check Point. Any technology, know-how, or data received or developed in connection with Check Point must be used solely for their intended purposes. Unauthorized use, reproduction, or distribution of intellectual property, including patents, trademarks, and copyrights, is prohibited. Any transfer of technology must safeguard intellectual property, and suppliers and business partners shall avoid infringing on Check Point's or third-party rights.

Confidential Information and Information Sharing

Suppliers and business partners shall properly manage and protect all confidential, proprietary, or competitively sensitive information belonging to Check Point, treating the information in accordance with the following standards:

- No disclosure of Check Point's confidential information to any unauthorized third parties;
- No use any of Check Point's confidential information for any purposes except those for which it was provided;
- Safeguarding confidential information; and
- Taking all required measures to protect the confidential information.

Furthermore, suppliers and business partners shall not speak to the press or any public relations agency on behalf of Check Point, nor disclose Check Point's confidential information, including details of a business relationship, without explicit written authorization from Check Point officials.

Data Protection, Privacy, and Information Security

Suppliers and business partners shall comply with all applicable laws, regulations, and standards regarding data protection, privacy, and information security, including the collection, storage, processing, transmission, and disclosure of data. Suppliers and business partners shall ensure the protection of personal information and implement measures to safeguard against data breaches, unauthorized access, and other security threats. Furthermore, and as deemed relevant, Check Point may conduct audits of key manufacturing suppliers' network and security measures to ensure that they align with our high information security and data protection standards.

Compliance Management and Control

Implementation and Compliance

Suppliers and business partners shall comply with this Code and ensure that their employees, suppliers, and subcontractors adhere to similar standards. Effective implementation should be achieved through policies, training, and internal controls designed to prevent and detect any unlawful or prohibited conduct. Periodic training and continuous communication of these standards are essential to ensure that all relevant parties understand and follow the requirements.

To this effect, suppliers' and business partners' management procedures should include:

- Adoption of policies and statements confirming the supplier's or business partner's compliance with relevant laws and regulations;
- Identification of senior executives who are responsible for implementation, compliance, risk assessment, and management;
- Provision of training to employees;
- Setting objectives for improvement; and
- Periodically auditing their own operations and business relationships, as required.

We expect our suppliers and business partners to review and adhere to this Code.

Risk Management

Suppliers and business partners shall identify and manage risks related to labor, human rights, environmental impact, business ethics, and legal compliance in their operations and supply chains. This includes conducting regular risk assessments and implementing appropriate measures to mitigate any identified risks.

Audits and Record-Keeping

Check Point reserves the right to conduct audits on supplier and business partner sustainability performance from time to time and as needed to verify compliance with this Code. Suppliers and business partners shall maintain accurate records of their operations and transactions to demonstrate compliance. These records should be available for review upon request and suppliers and business partners are expected to fully cooperate with Check Point and its authorized auditors.

Amendments and Updates

Check Point is entitled to update and/or amend this Supply Chain and Business Partner Code of Conduct from time to time. Suppliers and business partners are responsible for regularly reviewing the most current version, as published on Check Point's website, to ensure compliance with any changes or updates.

Contact Information for Reporting and Raising Concerns

Suppliers and business partners are encouraged to ask questions and promptly report any concerns regarding violations of laws, regulations, or Check Point's standards. Concerns may involve questionable, fraudulent, or illegal activities that potentially violate this Code or other applicable laws.

Reports or questions regarding this Code can be submitted to ethics@checkpoint.com.

Check Point will protect, support, and maintain confidentiality to the fullest extent possible under the law and will not tolerate retaliation against anyone reporting concerns in good faith.

Last update: September 16, 2024

Annex A – Regulatory and Legal Compliance Requirements Pertaining to Hardware Suppliers

Our hardware suppliers shall comply with the following standards and certification requirements:

- Uphold a certified quality management system in their manufacturing environments in compliance with ISO 9001 or TL 9000 standards. Our Quality Assurance Team reviews and ensures such compliance.
- Uphold the requirements and specifications of an environmental management system as specified by ISO 14001 in their manufacturing environments.
- Comply with international standards to ensure health and safety at work, such as ISO 45001 or OHSAS 18001 in their manufacturing environments.
- Comply with the European Union's "Restriction of Hazardous Substances Directive 2011/65/EU" (RoHS II) directive on the restriction of the use of hazardous substances in electrical and electronic equipment.
- Comply with the European Union's "Registration, Evaluation, Authorization, and Restriction of Chemicals" (REACH) regulation to improve the protection of human health and the environment from chemical risks, in accordance with the database for information on "Substances of Concern in Products" (SCIP).
- Act in accordance with the European Union's "Waste Electrical and Electronic Equipment" (WEEE) directive for the treatment of electrical and electronic equipment waste.
- Comply with Conflict Minerals regulations regarding minerals from conflict-affected areas that are necessary to the functionality or production of our products, namely tin, tantalum, tungsten, and gold.
- Adhere to the Proposition 65 standards with regards to our new product models to provide warnings to California consumers about potentially significant exposure to chemicals that cause cancer, birth defects or other reproductive harm.
- Adhere to the regulatory framework for reporting on the presence of "Persistent Organic Pollutants" (POP) in products that can adversely affect human health and the environment, according to the Stockholm Convention on Persistent Organic Pollutants.

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