

A nighttime photograph of a city street with several tall, modern skyscrapers. The buildings are illuminated with warm yellow and orange lights, creating a vibrant glow. The sky is dark, and the street in the foreground is wet, reflecting the lights from the buildings and streetlights. The overall atmosphere is urban and modern.

clearswift

Code of Conduct

January 2015



The purpose of this code of conduct is to help you to understand what is expected of you and what Clearswift will commit to do with regard to standards of behaviour.

There are a number of reasons why your conduct at work is important. We are committed to providing the best possible working environment for all of our employees and the best possible support to our Clients. Good conduct not only helps to promote good relations with clients but also helps protect you and your colleagues (for example by not leaving individuals open to criticism or legal action).

This code of conduct is provided to you so that you know what is expected of you and you are treated fairly. You are a valued and trusted employee so it is crucial that you understand how important it is to adhere to the standards of conduct set out in the code (and any related policies) as a breach of these standards could lead to disciplinary action. A serious, or repeated breach, could even lead to dismissal from the company.

Underpinning our Code of conduct are our Company Values:

- Collaboration
- Innovation
- Passion

Given our global nature, individual countries have their own policies and procedures which ensure that we comply with local legal obligations. In this document the Code of Conduct is generic and applies to all employees of Clearswift and contractors working with us. Please contact your manager if you are in any doubt about how your conditions of employment work when taken together with this code of conduct.

Heath Davies
CEO

Overall Responsibilities

Clearswift:

- Expects your work, conduct, and integrity to be of the highest standard
- Requires that you read (and if necessary seek clarification) and understand this code and then sign a declaration to that effect

You:

- After joining Clearswift (or within a reasonable time after receiving this code): should get to know the contents and meaning of the code and ask your manager to explain anything that you don't understand
- Should tell your manager (or the most appropriate manager) if you believe that we fall short of the standards in this code
- Should tell your manager (or the most appropriate manager) about anyone else breaking the code and/or breaking the law.
- Should notify your manager or the appropriate person of any relevant matter as specified within this code

Clearswift recognises that its Suppliers may not be able to achieve all the standards laid out in this Code immediately but is willing to engage with Suppliers who:

- Have implemented, or are willing to implement, appropriate and workable processes for raising standards to be compliant with this Code within an agreed period; and
- Are able to demonstrate a responsible and transparent approach to their working and general practices;

THE CODE

Employees should assume that conduct or actions which are not specified but which are similar to those described, or relate to similar standards and principles to those set out in the code are also covered. This code should be seen as complementary to any specific departmental procedures or standards of conduct.

General Behaviour

All workers are expected to work within the scope of their contract of employment, carrying out the reasonable instructions of their managers, and to work to the requirements of the job.

You should:

- Comply with your contract in all regards and comply with all applicable policies associated with your employment and communicated to you either directly or via company intranet, e mail etc
- Notify your manager in writing if you are convicted of a criminal offence which would make you unfit for the job you do or you are charged with a crime which (if convicted) would make you unfit for the job you do

You should not:

- Be dishonest in your dealings with Clearswift, its clients and suppliers, your colleagues or your manager
- Be in possession of, consume, or supply any controlled drug (other than appropriately prescribed medication) in the workplace or whilst carrying out company business offsite and/or perform duties to an unsatisfactory standard due to drinking alcohol during breaks or immediately before work or whilst carrying out company business offsite
- Present an unprofessional image of Clearswift
- Misrepresent Clearswift in your dealings with others or make any statement on behalf of Clearswift which you are not authorised to make (e.g. giving a reference for a colleague on behalf of Clearswift, making statements to the press or other media)
- Commit any act of misconduct or breach of your employment terms

Compliance with Laws and Regulations

Clearswift will ensure that:

- All workers have reached the minimum legal working age under national law
- All workers are in a safe, hygienic working environment and there is compliance with all national health and safety laws.
- There is compliance with local legislation regulating employment, hours of work and pay, including any minimum wage, allowances and benefits (including, without limitation, holidays, sick leave, child care, maternity provisions, social security) and must not seek to avoid their legal obligations to workers by any means.
- Workers are allowed to join or form trade unions or similar employee forums if national law requires this or it is deemed likely to enhance employee relations
- There is compliance with applicable local environmental regulations and will demonstrate an awareness of environmental matters and a commitment to You

You will:

- Take reasonable steps to protect your own health and safety and that of other people who may be affected by your actions or omissions at work
- Comply with all instructions relating to health and safety and security procedures and follow all the health and safety codes of practice and policies which are relevant to your work

Respect for Human Rights

Clearswift:

- Recognises the entitlement of all individuals to be treated equitably with dignity and respect and to work in an environment free from harassment, physical and verbal abuse, threats or intimidation of any description.
- Will ensure that disciplinary practices are fair and appropriate and must be clearly set out and communicated to workers. Workers have the right to appeal and representation at disciplinary proceedings.
- Will not discriminate against workers in any manner on the grounds of gender, religion, race, caste, age, disability, sexual orientation, union membership, political affiliation, national or ethnic origin.



Acting fairly and not for personal gain

Clearswift

- Will conduct business in an ethical manner and not seek to gain competitive advantage by means of unethical or dishonest practices including without limitation; bribery, corruption, kickbacks, the provision of gifts, favours or services

You:

- Will not use your position with Clearswift inappropriately to advance the interests of any other person or organisation with which you are associated, or show favour to any friends, family or personal contacts
- Will report to your manager any attempts to bribe, threaten or otherwise inappropriately influence you and you will not ask for or accept bribes or incentives of any sort. This does not prevent you accepting reasonable hospitality while you are working when visiting sites or offices or accepting an invitation which it is proper for you to take up as you will be representing Clearswift appropriately. If in doubt, consult your manager.
- Will avoid putting yourself in debt to someone where this would be likely to or could be seen to influence your work
- Will always consult and follow Clearswift's financial procedure rules
- Will notify your manager in writing if you have links of any sort (including, but not limited to, as a director, company secretary, trustee, partner, shareholder, owner, contractor or employee) with an outside organisation which may create a conflict of interest.

Protecting Intellectual Property and Maintaining Confidentiality

Where intellectual property (e.g. reports, designs and software development) has been created in the course of a worker's normal duties, it remains the property of Clearswift and should not be passed on to third parties.

You should:

- Keep all personal data confidential, whether computerised or manually held, and comply with the law and Clearswift policies and ensure that information about identifiable people is accurate, relevant, up to date, kept confidential and protected against unauthorised access.
- Not improperly disclose, or use (directly or indirectly) any information (either about Clearswift business or employees that you receive in the course of your work or allow others to do so.



Clearswift is trusted by organizations globally to protect their critical information, giving them the freedom to securely collaborate and drive business growth. Our unique technology supports a straightforward and 'adaptive' data loss prevention solution, avoiding the risk of business interruption and enabling organizations to have 100% visibility of their critical information 100% of the time.

As a global organization, Clearswift has headquarters in the United States, Europe, Australia and Japan, with an extensive partner network of more than 900 resellers across the globe.

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