

# The Avast Code of Conduct

## Message from the CEO

**Our purpose is simple. We're here to keep people around the world safe and secure online.**

Today, Avast is the world's leader in consumer cybersecurity, a position we've achieved through technological and business innovation, driven by our mission to keep people safe online - and, admittedly, a passion for kicking the bad guys' asses. When I started as an intern at Avast over 20 years ago, I could never have imagined the journey ahead. Not only has our business grown exponentially, but the problems we are solving have also become immeasurably more complex and consequential. Even with all that growth, our mission and our passion have remained rock steady.

In the age of artificial intelligence and with the proliferation of connected devices and the Internet of Things, it's more difficult than ever for people to maintain their security and privacy online. From social networks to banking, online shopping to health records, streaming services to smart homes, each of us gains convenience from this digital age while opening ourselves up to many potential risks. Cyber criminals have countless tools at their disposal to cause harm. It's in their interest to become ever more sophisticated. It's our business to stop them.

**The Avast Code lays out the principles for how we do it.**

Avast has always advanced by creating the most powerful technology to eliminate online threats and prevent attacks before bad actors cause harm. Our sophisticated platform gives us an edge over attackers and sets us apart from our competitors, and we continue to enhance our capabilities.

But our technology isn't the only thing driving Avast's achievements. Conducting our business transparently and responsibly has propelled us to the top and will continue to fuel our success.

This Code lays out the principles we must all follow with discipline and consistency. It sets the foundation for how we work together, treat our customers, and operate responsibly within a set of diverse markets and constraints. We put people first, taking our commitments to each other, our customers and the broader society very seriously. As a global company, we operate in various jurisdictions and comply with applicable regulations and customs everywhere we do business.

By following the Avast Code, all Avastians are empowered to use their judgment in the best interest of our customers and our company. Every Avastian contributes to our success — every one of us, from the summer interns to the CEO, must hold ourselves to the highest standards of ethics and responsibility. Big things are in Avast's DNA and we fearlessly embrace the challenges and opportunities ahead — guided by the Avast Code and our enduring commitment to keeping people around the world safe online.

I count on each of you to make the Avast Code more than a list of principles and to take an active part in conscientiously shaping the future and the culture of Avast.

Ondrej Vlcek, 2019

## Avast's Vision and Mission

At Avast, we believe everyone has the right to be safe. We are dedicated to creating a world that provides safety and privacy for all, no matter who you are, where you are, or how you connect.

We have grown into one of the largest cybersecurity firms in the world by constantly striving for excellence in everything we do. We are industry leaders dedicated to protecting people from security threats before they happen. We stay flexible and adaptable, creating an atmosphere where everyone's voice counts. And we always take a customer-first approach.

## About the Code

Avast's Code of Conduct (Avast Code) is an overarching policy that describes what we expect of all **Avast personnel** and what you should expect from your colleagues. Several sections make reference to additional policies that describe these expectations in greater detail. These policies also apply to all Avast personnel, and you are expected to know and abide by the policies that are relevant to your area of work.

Throughout this Code, you'll find some bold terms, which are defined in the glossary at the end of this document.

## Workplace expectations

Successful teams, loyal customers and strong relationships all require trust. Our workplace rules are aimed at creating the trust our team needs to succeed.

### Customer first

We are building a long-term, sustainable, ethical business, and our success rests on building customer trust and maintaining customer satisfaction. The people we protect – our customers – are the focus of everything we do. From product innovation to creation and design, from marketing and product communications to customer support, creating positive customer experiences is paramount.

### Respect

We treat others with respect and dignity at all times and in all forms of communication throughout the company. We can disagree but should still seek common ground in our shared mission and appreciate that our differences can make us stronger. Remember, when someone has a different opinion, if you listen with an open mind, you may learn something new. For more specific information, please see the [Speaking Up and Working Together communication guidelines](#).

### Diversity and inclusion

Avast values diversity and will recruit and promote employees based on their suitability for the job and Avast's needs. We never discriminate against any race, religion, national or ethnic origin, color, gender, sexual orientation, age, marital status, or disability.

Avast provides all employees with equal opportunity to develop themselves and their careers.

For more information, please see Avast's [Diversity](#) and [Recruitment](#) policies.

## Safe workplace

We don't engage in or tolerate any sexual, physical, or verbal (including online) harassment or bullying of Avast personnel, business partners, suppliers, or customers. All employees are expected to be open, honest, and courteous with each other, and to be professional and courteous with all those that we deal with in a business context. In short, treat others as you wish to be treated.

## Public engagement and obligations

### Public disclosure

We are responsible for providing full and accurate information in public disclosures about our financial condition and results of operations. All public filings must include full, fair, accurate, timely and clear disclosure. To ensure that we are able to present a balanced, consistent and understandable assessment of the company's position and prospects, Avast has put in place comprehensive accounting policies and procedures, to which adherence is mandatory. For more information on any financial policy, please refer to the [Avast Finance Manual](#).

### Tax and record keeping

Avast personnel must make honest declarations of business expenses, and provide receipts as detailed in our [Travel & Expense Policy](#). Where Avast personnel receive a taxable benefit in connection with their employment, they must declare that benefit to the responsible tax authority. This includes non-cash benefits, like vacations or gifts.

### Community engagement

Avast promotes and supports community engagement. As a member of the Avast team, you are encouraged to participate in community and civic affairs. However, we ask that you avoid any outside personal interest or activity that will interfere with your duties to Avast.

### Care of the environment

Where it is in our power to do so, we will avoid or mitigate any harmful effects of our operations on the natural environment and resources.

### Political donations and lobbying

Avast does not directly or indirectly participate in party politics or make payments to political parties or individual politicians, but we will represent our views to governments and others on matters affecting our business interests and those of shareholders, employees, and customers.

## Business ethics

Avast respects the traditions and cultures of each country in which it operates. We comply with all laws and regulations. Where there is a conflict between local laws or customs and the principles and values set out in the Code, you must apply whichever sets the highest standard of behavior.

Certain behavior may be a red flag that someone is acting or plans to act unethically. For instance, if you hear someone say any of the following, consider carefully whether their next action is ethical or appropriate!

- *"Well, maybe just this once."*

- *“No one will ever know.”*
- *“It doesn’t matter how it gets done as long as it gets done.”*
- *“It sounds too good to be true.”*
- *“Everyone does it.”*
- *“Shred that document.”*
- *“We can hide it.”*
- *“What’s in it for me?”*
- *“Don’t ask questions.”*
- *“Don’t write it down.”*
- *“We didn’t have this conversation.”*

## Conflict of interest

Avast personnel may not engage in activity for personal gain which conflicts with Avast’s business interests. A conflict of interest may arise when you, a relative, or a friend receives a personal benefit as a result of your position at Avast. Any such personal interest must be disclosed. For more information and further guidance on this subject see [Avast’s Conflict of Interest Policy](#).

## No corruption or bribery

Corruption or bribery occurs when someone offers a benefit, financial or otherwise, to another person in return for an improper favor or other advantage (perceived or actual). We never engage in these behaviors, and Avast personnel must be careful to avoid any appearance of bribery or corruption, whether intended or not. For more details and further guidance, see Avast’s [Anti-Corruption Policy](#).

Business transactions between Avast and shareholders, directors, and persons exercising significant influence over the company are governed by the [Related Party Transaction Policy](#).

## Gifts and entertainment

If you have something to give customers, partners, or distributors, you must be sure it does not influence the recipient’s objectivity or make the recipient feel obligated to you or the company. If in doubt, obtain prior approval from your manager.

If you receive something from suppliers or other business partners, this could be viewed as them trying to bribe you in order to curry favor or get something in return. Avast deals with its suppliers and business partners objectively, and we don’t engage in that kind of behavior. All Avast personnel should observe the following principles:

- Don’t solicit gifts or favors
- Never accept gifts in the form of money
- Gifts with a nominal value (value should be less than USD 100 or equivalent) may be given or accepted, as long as they do not place the recipient under any obligation, can’t be misconstrued as a bribe, and can be reciprocated at the same level.
- Report any offer of small but recurring gifts, such as regular meals or drinks, to your manager, who will determine whether you may accept such gifts or must refuse them.
- Report any other gifts or favors that are unusual or disproportionate or have questionable purposes immediately to your manager.

When in doubt as to whether a contemplated gift or payment may violate anti-corruption laws, talk to your manager or the legal department before taking any action. This is outlined in detail in Avast’s [Anti-Corruption Policy](#).

## Selecting and working with suppliers

Avast selects its suppliers based on fair and robust selection processes, taking into account the quality and cost of service delivery. We will pay our suppliers, subcontractors, distributors, and agents in accordance with the agreed upon terms. Every supply must be documented by a written order or a written contract. Further information on how we select and work with suppliers can be found in the [Avast Purchase to Pay Policy](#).

## Anti-money laundering laws and sanctions

Avast is committed to business practices that prevent **money laundering**. Money laundering is the practice of concealing the origin of proceeds derived from criminal activities. In addition, we have implemented systems to ensure that our products are not distributed to users in sanctioned countries or to certain individuals designated as denied persons. For further information, see [Avast's Sanctions, Anti-Money Laundering and Counter Terrorist Financing Policy](#).

# Protection and responsible use of information

## Confidential information

Protecting the confidentiality of our business information is critical to Avast's success and business integrity. **Confidential information** is any information about Avast or its business partners that is not generally known to the public and which Avast or its partners have a legitimate interest in protecting from disclosure. Unauthorized disclosure could damage Avast or give an unfair advantage to others. Confidential information includes information about new products, pricing, software development, source codes, data of third parties, personal data, **inside information**, or Avast strategies. It also includes information received from a business partner which Avast is contractually bound by a duty of confidentiality not to disclose.

Confidential information must be actively protected. Avast personnel must not disclose confidential information to third parties or to colleagues that do not need to know such information without prior authorization. Business partners should be contractually bound by a duty of confidentiality.

- Ask yourself the following questions when considering whether to share information:
- Is the information beneficial to Avast, Avast shareholders and my colleagues?
- Am I sure that it is not inside information?
- Would I be comfortable if it appeared in a newspaper?
- Has this person been authorized to receive this information?

As always, if you are not sure about whether to disclose information, check with your manager or the Legal Department.

## Non-public information

Anything learned about Avast that has not been revealed publicly may constitute **inside information** if it might have a significant effect on the price of the Company's shares.

Avast employees may not disclose inside information to anyone. Employees who think that they may possess inside information should consult with the General Counsel before trading with Avast securities or sharing any such information.

For more information and further guidance on dealings with Avast securities see our [Group-Wide Dealing Policy](#). Avast's [Inside Information Disclosure Policy](#) contains detailed explanations on what constitutes inside information and how to deal with it.

Examples of potential inside information include (but are not limited to):

- Information that Avast is about to win or lose a large contract
- Information that Avast is about to announce a major change in strategy or an important new product
- Information that Avast is about to acquire a company or sell a division or product
- Information about potentially significant financial data
- Information about developments in lawsuits or regulations that will significantly impact Avast
- Significant information about an important Avast customer, supplier or other business partner

## Data protection

Avast collects and processes **personal data** and information, mainly of its customers and employees. Avast will only collect and retain personal data and information that is required for Avast's effective operation or as required by law. Avast's collection, processing, and use of such information from employees is outlined in the [Employee Personal Data Notice](#).

All Avast personnel must keep personal data of customers confidential, and treat all such data in accordance with the principles and rules laid out in the comprehensive [Avast Data Guide](#). You may access *only* such personal data and information that is necessary for the performance of your job. It is a violation of this Code and our information security policies to use personal data for your own benefit or private purposes, and such a breach may result in disciplinary action.

## Information security

Avast protects all information in its possession from misuse. This includes information about users, customers, business partners, employees, or the Avast business. All Avast personnel should protect any data, information, hardware and software in Avast's possession from unauthorized access, use, disclosure, modification, recording, or destruction. For further information and guidance, please see Avast's [Information Security policies](#).

## If the Code is broken

We commit to upholding the highest ethical standards at Avast, and we are all responsible for following the principles outlined in the Avast Code and in each of Avast's policies, which are in place to protect our business and ensure we are set up for success.

## Reporting concerns

If you suspect a violation of the Code or one of our core policies, you have an obligation to report it. If you are ever uncertain about the ethics of a certain situation, talk to a manager or executive, HR, or the Legal Department.

## How we respond to concerns

When an Avast manager or executive receives a report or is told that the Avast Code has been or is being violated, the manager or executive needs to maintain the trust that has been given by the person reporting it. Managers and executives must take reports of Code violations seriously, and promptly take appropriate action to investigate the issue.

Managers must respond to reports and concerns about code violations by

- Taking the concern seriously
- Clarifying what was said
- Ensuring they have the full picture
- Not jumping to conclusions
- Keeping an open mind
- Maintaining confidentiality
- Resolving the issue, if possible
- Escalating to the appropriate team or person, if necessary

## Reporting a concern confidentially

Formal grievances can be raised to HR according to the guidance outlined in the [Grievance Procedure](#). In instances where you do not feel comfortable reporting in accordance with the Grievance Procedure, you may use the [Avast Ethics & Reporting Line](#), which is accessible at <http://www.avast.ethicspoint.com>, to report violations of this Code, on a confidential basis. You may report a concern online or over the phone.

Country	Line Type	Dial-in Number(s)	Access code
Australia	ITFS	1 800 79 2095	NA
Canada	DD	1 855 862 1160	NA
China (incl. Hong Kong)	DA	10 811 (Southern) 108 888 (Northern)	855 862 1160
Czech Republic	ITFS	800 143 875	NA
Germany	DA	0800 225 5288	855 862 1160
Japan		0034 811 001 (NTT) 00 539 111 (KDDI) 00 663 5111 (Softbank Telecom)	855 862 1160
Netherlands	GIS	0800 292 9255	NA
Norway	ITFS	800 13955	NA
Russia	DA	363 2400 (Moscow or St Petersburg) 8^10 800 110 1011 (^ indicates second dial tone)	855 862 1160
Serbia	GIS	0800 190 968	NA
Slovakia	DA	0 800 000 101	855 862 1160
Switzerland	DA	0800 890011	855 862 1160
Taiwan	DA	00 801 102 880	855 862 1160
United Kingdom	ITFS	0808 234 7272	NA
United States	DD	855 862 1160	NA

**Note:** If the call type is DA, you will first dial a local dial-in number and then at the prompt enter a unique number for your organization (access code). Some countries may have multiple dial in numbers. For DD (Direct Dial), ITFS (International toll free service), and GIS (Global inbound service) lines, you will dial the number and be connected directly to the hotline.

You can speak to an agent in English or another language. You do not have to give your name. Your call will be answered by an independent third-party agent. The agent will ask questions which will help to create a report of the facts. You will be assigned a reference number for follow-up calls, so you can include additional facts or check on the status of your concern.

## No retaliation

Avast will not tolerate retaliation against anyone who makes a report in good faith. The success of the Avast Code depends on building open communication without fear of retribution or retaliation.

For more information, please refer to the [Avast Whistleblowing policy](#).

## Violations of the Code

Substantiated violations of the Avast Code may result in disciplinary action, up to and including termination. This is in addition to any action taken by any law enforcement authorities to whom we report potential violations of civil or criminal law.

## Additional information

All Avast policies can be obtained from the [Avast Policy Center on the Avast intranet \(CML\)](#) or from the relevant department.

It is a manager's responsibility to make sure his or her team knows and has access to the policies that affect their jobs.

## Definition of terms

**anything of value** includes items of obvious monetary value (such as gifts, tickets, travel, expensive entertainment, money, etc.), as well as non-tangible items, such as a business opportunity or position for a person or a member of their family.

**Avast personnel** or **personnel** means all individuals working at all levels, bands, and grades within Avast, including directors, senior management, officers, employees (whether permanent, fixed term, part-time or temporary), as well as contractors, seconded staff, consultants, agents, volunteers, interns, sponsors, and any other person associated with Avast or its subsidiaries, wherever located.

**confidential information** means any information about Avast, its business partners, or its customers, that is not generally known to the public and which Avast, its partners, or its customers have a legitimate interest in protecting from disclosure. Unauthorized disclosure could damage Avast or give an unfair advantage to others. This includes but is broader than the category of inside information.

**inside information** is broadly defined as information that is precise, has not been made public, relates directly or indirectly to the Avast Group and would, if generally available, be likely to have a significant effect on the price of the Company's shares and/or of related investments. Examples are given in this document and further information is available in the company's Inside Information Disclosure Policy.

**money laundering** is the practice of concealing the origin of proceeds derived from criminal activities.

**personal data** is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

**protected characteristics** are those characteristics defined by statute for which it is legally prohibited to discriminate.

## Versions and approvals

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