



## Supplier Code of Conduct

### **In General**

This Supplier Code of Conduct applies to all Trellix suppliers and their personnel. Our suppliers are expected to adhere to the Responsible Business Alliance (formerly known as the Electronic Industry Citizenship Coalition) Code of Conduct at: [https://www.responsiblebusiness.org/media/docs/RBACodeofConduct7.0\\_English.pdf](https://www.responsiblebusiness.org/media/docs/RBACodeofConduct7.0_English.pdf), as applicable to the type of products, services and/or other deliverables that the supplier provides to Trellix.

In order to assess and validate a supplier's compliance with this Code, Trellix requires that all prospective suppliers complete an onboarding questionnaire and provide compliance representations. Trellix reserves the right to audit the supplier's compliance with this Code in an appropriate manner, during the term of Trellix's agreement with the supplier. Compliance with this Code is essential for the business relationship between Trellix and Supplier. Trellix reserves the right to terminate its agreement with a supplier if the supplier fails to adhere to the requirements of this Code.

### **Anti-Bribery and Anti-Corruption**

Trellix does not tolerate any form of corruption. Suppliers (including suppliers agents) must comply with all applicable laws, directives and regulations concerning bribery and anti-corruption, including, but not limited to, the United States Foreign Corrupt Practices Act ("FCPA"), the U.S. Federal Procurement Integrity Act, the U.K. Bribery Act of 2010, and other country-specific laws.

Suppliers must not, directly or indirectly, make, offer or authorize the payment of any money, gift, bribes, kickbacks or anything of value to anyone (this includes gifts, favors, loans, travel, meals and entertainment), including foreign or government officers, employees, or representatives of any government, company, public or international organization (such as the United Nations or World Bank, etc.), political party, state-owned entities, or to any other party, if such payment is intended, or could be perceived as intended, directly or indirectly, to improperly influence or obtain any unfair competitive advantage. Suppliers may not offer employment to government employees or officers if doing so would violate applicable laws.

More information about the FCPA can be found at: <https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>.

### **Financial Integrity and Accounting**

Suppliers shall create and retain complete and accurate books and records in full accordance with applicable legal and contractual requirements regarding all transactions or other expenditures with respect to any Trellix-related business. Suppliers must not engage in false and/or misleading accounting practices, including but not limited to creating "slush funds" or other improper financial practices.

### Unfair Business Practices

Suppliers must comply with all applicable fair business, advertising, and antitrust/competition laws; suppliers shall not agree with other companies to coordinate or fix prices, boycott suppliers or customers, divide or allocate markets or customers, or propose or enter into agreements or understandings that restrict the resale price of Trellix products.

### Gifts, Entertainment, Travel and Political Contributions

Suppliers are not authorized to, and shall not offer or provide, either directly or indirectly, any type of gift, entertainment, travel or political contributions or charitable donation of any value, to any third-party on Trellix's behalf.

Any hospitality or courtesy offered by supplier to a Trellix employee should be reasonable, infrequent, within the ordinary course of business, and not offered with an expectation of obtaining special treatment in connection with any business transaction. Suppliers must refrain from offering Trellix employees anything that would create the appearance of being improper or that would conflict with applicable laws or otherwise with the principles set forth in this Code of Conduct. No cash or cash-equivalent gifts are permitted to be provided to Trellix employees at any time.

### Lobbying Activities

All lobbying-related activities (at any level of government) are managed by Trellix's Public Policy Team. No supplier is authorized to undertake any type of legislative or procurement lobbying activities unless the supplier has received the express written approval by Trellix's Chief Public Policy Officer.

Any supplier who receives such express authorization shall comply with all applicable lobbying laws. If the supplier is required to register as a lobbyist in a given jurisdiction, the supplier shall first *notify* Trellix of this requirement *before* supplier registers.

### Conflicts of Interest

Suppliers shall not engage in any activity that would interfere with their contractual responsibilities to Trellix or that may appear to be a conflict of interest that could reasonably be likely to interfere with such responsibilities.

Conflicts of interest can include, but are not limited to, Trellix personnel acting as an officer, director or significant shareholder of supplier, or the payment of incentives or providing economic benefits such as excessive gifts, hospitality, or entertainment to any Trellix employee, personnel, or their family members.

Supplier must promptly notify Trellix if it becomes aware of any actual or potential conflict of interest.

### Trellix's Proprietary and Confidential Information

Suppliers shall protect Trellix's proprietary/confidential information from unauthorized disclosure, modification, destruction or use, and supplier shall implement, as necessary, adequate physical security, recovery capabilities, electronic access controls, and/or enter into enforceable nondisclosure agreements.

Suppliers may not misuse Trellix confidential, proprietary, or non-public information for their own purposes or benefit.

## Privacy

Suppliers shall observe applicable data privacy and information security requirements when handling Trellix or third-party information provided by Trellix. Trellix's Privacy Policy is available at <https://trellix.com/en-au/about/legal/privacy.html>.

## Other Requirements

Suppliers must be able to make the following representations throughout the term of their applicable agreement (including any SOW) with Trellix:

- Supplier has not been listed by any government or public agency as debarred, suspended, or proposed for suspension or debarment or have otherwise been found ineligible for any government procurement programs or grants within the past 10 years; and
- Supplier's status as a business is identified as being "active" and "in good standing" or equivalent status, in the applicable government business and tax records where supplier conducts business in support of Trellix.

Supplier will inform Trellix if, due to changed circumstances, Supplier is unable to make either of of the above representations.

## Reporting Concerns

Suppliers can report concerns regarding suspected violations of applicable laws or this Supplier Code of Conduct through **Trellix's Ethics Helpline**. Reports can be made anonymously and will be fully kept confidential, as allowed by law.

Trellix Hotline: <https://www.trellix.com/ethics-help-line>

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