

# CHAPTER /01 Code of Business Conduct

## OUR PRINCIPLES OF BUSINESS CONDUCT

As employees of Absolute, we undertake to:

- comply with applicable laws, regulations and Company policies and procedures
- carry out our work duties and conduct our business relationships with integrity, honesty and fairness
- avoid all conflicts of interest
- foster a work environment based on trust and respect for all stakeholders of the Absolute community
- foster a work environment which encourages open communication
- maintain a safe and secure workplace and protect the environment
- sustain a culture in which ethical conduct is recognized, valued and exemplified by us all

## INTRODUCTION

### Who it applies to

This Code of Business Conduct (referred to as the "Code") provides various rules and guidelines for ethical behavior based on Absolute's values, as well as applicable laws and regulations. The Code applies to all employees, consultants, contractors, officers and (where applicable) directors (collectively referred to as "employee(s)") of Absolute, its subsidiaries, other controlled entities and joint ventures (collectively referred to as the "Company").

The Code reinforces the Company's commitment to customer service, its support for a working environment in which people are respected and its sensitivity to the needs of the community that it serves.

### Personal integrity

Helping the Company meet this commitment is an essential part of our job. It's also a matter of personal integrity. Among other things, personal integrity means performing our job fully and competently in order to meet the Company's business needs and ensure customer satisfaction. It also means being accountable for our behavior and supporting the shared goal of all of us to uphold the values, principles and standards upon which our Company's reputation rests.

In addition, we and our shareholders expect honest and ethical conduct in all aspect of our business. We require our executive management team, and indeed all employees, to follow the highest standards of honest and ethical conduct.

### Our responsibility

Many aspects of our business are governed by particular laws, and compliance with such laws is basic to ethical conduct. Ethical behavior, however, goes beyond compliance with

the law. It involves thinking through the possible impact of our decisions on all interested parties – business partners, customers, employees, the communities in which we live and work, suppliers, alliance partners, investors, government and shareholders—even when not required to do so from a legal or regulatory point of view.

Although the Code lays out the fundamental principles of ethical and legal conduct, it cannot anticipate every ethical dilemma or situation we may encounter as we perform our jobs, nor can it address every law that applies to the Company. This would be impossible given that the technology industry and applicable laws are evolving so rapidly and unpredictably.

Consequently, we may often find ourselves caught in a situation or facing an ethical problem not explicitly covered in the Code. In this case, we must rely on our internal sense of what is right – our moral compass – to guide us in making the right decision.

When faced with a difficult or unclear situation, it may help to ask the following questions such as:

- how would I feel if, rather than initiating this action, I was on the receiving end?
- how would my business partner react if he/she knew I was breaking the rules or distorting the facts to make a sale?
- if I do this, how will I feel afterwards? Would I want my co-workers, friends or family to find out?
- if my actions became public, how would they be reported in the media?

Ultimately, we are all responsible for our individual actions, whether we act according to strictly defined rules or according to what we think is appropriate in a given situation. Assuming personal responsibility for our actions means we can't blame someone else for our behavior. Conversely, no one—not even

our manager—can force us to commit an illegal or unethical act that may damage the Company's reputation, or our own.

We have a solid reputation for honest and ethical behavior. We must preserve this reputation and integrity at all times. For this reason, any breach of the Code or evidence of illegal behavior will be taken very seriously. Depending on the severity of the case, employees who have been found to breach the Code or to commit an illegal act will face immediate discipline, up to and including dismissal.

Personal responsibility also means we have a duty to report illegal acts or violations of Company rules, regulations or the Code to management. Turning a blind eye to wrongdoing—in effect condoning such behavior—is itself unethical.

### Business conduct help line

The following list sets out who to contact for questions or issues relating to this Code:

1. To deal with all matters related to employee issues, ethical behavior, conflicts of interest or other topics covered in this Code, please **first** speak with Human Resources. You can reach Human Resources at +1-604-630-2290, or send an email to [hrconfidential@absolute.com](mailto:hrconfidential@absolute.com).
2. To report unethical or illegal behavior such as corporate fraud, or to report a **serious** violation of this Code or the Company's **Anti-Bribery Policy**, or to raise concerns regarding the Company's accounting, internal accounting controls or auditing matters please email [whistleblower@absolute.com](mailto:whistleblower@absolute.com) or [Absolutesoftware@whistleblowersecurity.com](mailto:Absolutesoftware@whistleblowersecurity.com). All anonymous messages will be screened and automatically be forwarded to the Chair of the Audit Committee. Keep in mind that replies will not be possible for messages that are sent anonymously.

**All inquiries will be handled in the strictest confidence to the fullest extent possible (consistent with the need to conduct an adequate review), and no employee will be penalized for inquiring about apparently unethical behavior or for obtaining guidance on how to handle suspected illegal acts or rules violations. Furthermore, the Company will not allow retaliation for reports made in good faith. Please refer to the Company's [Whistleblower Protection Policy](#) for further guidance.**

## COMPLIANCE WITH THE CODE

We are all individually responsible for knowing, understanding and complying with the Code. Individual responsibility doesn't mean, however, that we are expected to face troublesome ethical or legal questions on our own. Our colleagues and managers are there to help us, and the Company has a number of available resources to guide us through difficult situations.

All of us must uphold the Company's high standards of ethical

and professional conduct. Instilling trust, honesty and integrity into our work environment is a collective and continuing responsibility. After all, our success has always depended on the committed, combined efforts of us all. Protecting and enhancing the Company's reputation requires no less of a shared commitment.

### Employees' responsibilities

We are all required to comply with the Code and follow all Company policies and procedures. Breaching the Code or violating Company policy or procedure is serious and will result in disciplinary action, up to and including dismissal. Depending on the circumstances, it may also result in civil or criminal prosecution.

In addition, we must:

- perform our jobs and conduct our business affairs ethically, legally and with the utmost integrity
- seek advice or help when faced with a difficult ethical situation
- report any violation

### Managers' responsibilities

In addition to their responsibilities as employees, officers and managers have a special duty to uphold the Company's reputation for integrity, honesty and ethical conduct. This means:

- setting an example by complying with the Code at all times, even when doing so may seem difficult, time-consuming or inexpedient
- ensuring that all employees have access to the Code document, and that they know, understand and comply with its provisions
- ensuring that all employees review this Code annually and comply with the annual review process
- creating and maintaining a work environment that encourages ethical behavior
- fostering an environment of open communication in which problems may be raised and discussed without fear of reprisal
- immediately reporting, to the appropriate person or department, any apparent violation of the Code or breach of Company policy
- taking prompt and decisive disciplinary action when it has been proven that the Code has been violated

### Penalties for violation

All of us are expected to follow the Company's policies. In addition, we must follow policies set by individual departments or business units which may supplement or complement Company-wide policies. Failure to uphold both the letter and the

spirit of these policies will lead to disciplinary action, up to and including dismissal. Depending on the circumstances, it may also result in civil or criminal prosecution.

Disciplinary action will be taken should an employee, for example:

- violate a Company policy or disregard proper procedures
- ask others to violate Company policy
- deliberately fail to report a violation, fail to report a violation promptly or withhold relevant information concerning a violation
- fail to cooperate in the investigation of a known or suspected violation
- take action against an employee who reports a policy violation.

## CONFLICTS OF INTEREST

We owe our first business allegiance to the Company. This means placing the Company's interests – including those of business partners and shareholders—before our personal interests.

A conflict arises whenever we allow, or appear to be allowing, personal interests or relationships to impair our judgment and ability to make decisions with integrity and honesty. By thinking of ourselves first, we may act in a way that is damaging, or potentially damaging, to the Company. We may also harm our personal reputation.

Even if we do nothing wrong, our actions may sometimes appear to put us in a conflict of interest. This may be just as damaging as a real conflict.

Every employee holds a position of trust. With trust comes responsibility. It's up to each of us to avoid situations that may lead to an actual or potential conflict of interest, or to the appearance of a conflict of interest. We must not use our position to influence or bypass Company procedures for personal gain, or for the benefit of our family, friends, colleagues or anyone else.

Sometimes it's not easy to tell if a situation may lead to a conflict of interest. If you find yourself in this position, ask yourself the following questions:

- Am I following proper Company procedures?
- Do I stand to gain personally from my actions?
- Will my actions result in a financial or other advantage for myself, a relative or friend?
- Am I uncomfortable discussing this with my manager or fellow employees?
- Would I act differently if a friend or relative weren't involved?

If you ever have any doubts about a possible conflict, raise the matter with your manager or call Human Resources at +1-604-630-2290 or send an email to [hrconfidential@absolute.com](mailto:hrconfidential@absolute.com). Conflicts of interest are a serious matter—obtain the guidance you need.

### Loans

We should not accept, whether directly or indirectly, any loan or guarantee of obligations from the Company that is for our personal benefit except with the prior approval of the Board of Directors.

### Gifts and hospitality

We cannot offer gifts, gratuities, or hospitality (e.g., entertainment) to existing or potential customers or business partners, or accept gifts, gratuities, or hospitality from existing or potential customers, except within authorized and limited situations. Offering or accepting any gift, gratuity, or hospitality might be perceived to unfairly influence a business interaction and involves you in a conflict of interest situation.

Please refer to the Company's [Anti-Bribery Policy](#) for further guidance.

### Rewards points

When receiving rewards points for Company-related travel (e.g. airline points, car rental points or hotel points), the Company makes a distinction between points received for your own travel bookings, and points received for multi-person bookings. Please refer to the Company's [Corporate Travel and Expense Policy](#) for further guidance.

### Family and personal relationships

Each of us has a variety of personal relationships involving family and friends—relationships that we keep separate from our work. Sometimes, our work and personal lives intersect, and we may find ourselves considering a business relationship with a relative, partner or close friend.

We must disclose this relationship if it compromises, or threatens to compromise, our ability to act in the Company's best interest. Speak to your manager or Human Resources for further guidance. We should also be aware that bridging our personal and business lives may cause our competitors, customers or business partners—as well as colleagues within the Company—to believe we are in a conflict of interest.

To avoid a conflict, or prevent a situation from developing into a conflict, we must inform our manager if, for example:

- we are considering hiring a relative or friend
- a family member or close personal friend works for a customer, business partner or competitor
- a relative or person with whom we have a close relationship is an executive or major shareholder in a competing

company

With the growth of new companies in the software technology industry, we may also find ourselves in a close relationship (spouse, sibling, or friend) with someone who works for a competitor.

If we and the other person hold jobs which expose us to a significant risk of a conflict of interest, one of us would be required to leave our position and transfer to another position within the Company. If transferring is not possible, we must explore alternative solutions with Human Resources. Should no alternative be found, one of us might be required to leave our Company. Whatever the solution, the situation would have to be resolved so as to eliminate the potential for a conflict of interest.

If you find yourself in a close relationship with someone who works for a competitor, consider the following:

- What is the relationship between the Company and the competitor?
- What are your responsibilities as an employee and those of the person you are close to at the Company's competitor?
- Do you have access to confidential information?
- Does the person you are close to have access to confidential information?

If, after asking yourself these questions, you are concerned that you may be in a conflict of interest, speak to your manager or Human Resources.

For example:

*My partner has just become an executive sales manager for a company that services the computers in my department. Do I need to tell anyone about this?*

Yes. Someone could claim that the Company is giving your partner business because you are an Absolute employee. You should notify your manager and make sure you are not involved in any decisions regarding your partner's company.

### Business partner-funded incentive programs

Business partner-funded incentive programs, often offered to sales employees by business partners seeking to sell their products, may only be arranged and approved by a Senior Executive Officer.

It is up to the Senior Executive Officer to ensure there is no conflict between the Company's marketing strategy and the business partner's incentive program.

### Outside employment, corporate opportunities, and other activities

We all have a right to do what we want during our non-working hours. This could include holding another job in which we use the skills and experience acquired through our work at

the Company. However, we must ensure that our outside employment or other activities do not conflict, or appear to conflict, with the Company's business or with our ability to fulfill our duties as employees.

Therefore:

- You may not work for an organization that competes with the Company.
- You may not start up a business that plans to offer products and services that compete for business with those offered by the Company.
- You may not sell or promote a third party's line of products and services if these products and services compete for business with those offered by the Company.
- You may not use the Company's equipment, time, materials or facilities in paid or unpaid work for other organizations, unless specifically authorized by management (for example, to support a charitable community project).
- You may not accept outside employment or engage in any activity if that employment or activity will prevent you from performing your job at the Company fully and competently.
- You may not contribute to, or support, any political group, political candidate or political activity on behalf of the Company or in the Company's name.

To avoid a conflict of interest, or even the appearance of such a conflict, you should discuss any planned outside business activities with your manager.

### Improper influence on the conduct of audits

Employees are prohibited from coercing, manipulating, misleading or fraudulently influencing the Company's outside auditors when the employee knows or should know that his/her action, if successful, could result in rendering the Company's financial statements misleading.

### Insider trading

Securities legislation imposes restrictions with respect to the purchase and sale of shares and other securities, and "tipping" when a person has knowledge of information not yet known to the public and which generally could affect the market price of the securities of a given company.

You may not buy or sell securities of Absolute, its subsidiaries and associated companies or any other company that is a public company, with knowledge of undisclosed material information obtained in the course of your employment, or "tip" others concerning such information. In particular, we should be careful to avoid inadvertently disclosing confidential information to spouses, family members and others who live in your households, or to customers or business partners, friends and others, as this could be considered "tipping".

In addition, as an employee of the Company, you may not engage in the following with respect to Absolute securities or any of its affiliates' securities: (a) short sales; (b) purchases on margin; (c) sale of a call option; and (c) purchase of a put option.

You must exercise great caution in your trading in order to avoid inadvertent breaches of these restrictions. Please refer to the Company's **Insider Trading Policy** for further guidance.

## CONFIDENTIALITY

We must maintain the confidentiality of information entrusted to us by the Company or its customers or business partners, except when disclosure is authorized or legally mandated. We should consider all non-public information to be confidential. Even seemingly mundane information might be of use to competitors or harmful to the Company, its customers or its business partners if disclosed.

We must not disclose confidential information acquired through our jobs to anyone outside the Company, whether it concerns our customers, business partners, other employees or the Company as a whole. In addition, we must not share such information with fellow employees, unless they have a legitimate need to know.

### Customer and business partner privacy

The Company has long been committed to maintaining the accuracy, confidentiality, security and privacy of customers and business partners. This is reflected in Absolute's **Privacy & Cookie Policy**, **HIPAA Compliance Policy** and **Customer Account Access Policy**. Please refer to those policies for further guidance.

Please note that, subject only to certain narrow exceptions, applicable laws and the Company's **Privacy & Cookie Policy** require the Company to provide customers and business partners with access to all personal information about them that we may hold. This includes records such as customer and business partner care logs and notes. Accordingly, we should avoid non-factual entries or inappropriate language or comments. In creating such records, employees should keep in mind that the records might later be read by the customer or business partner in question.

It is also important to note that the Company's liability for damages for improper disclosure of confidential information may be unlimited.

Maintaining customer and business partner privacy and ensuring data protection is also crucial when dealing with contracts, proposals and quotations. We must be vigilant in ensuring that:

- We do not share customer or business partner information—

such as business plans, names of representatives or information of a sensitive nature—with other employees servicing a similar market segment (for example, the banking industry). By doing so, we may inadvertently divulge information about a customer or business partner to that customer or business partner's competitor.

- Unless a customer or business partner provides explicit consent, we do not share information about them with other affiliates or partners, agents or subsidiaries of our group, except with those affiliate or partners or agents or subsidiaries of a group, who are directly involved in the specific contract, proposals or quotations.

### Proprietary information

Many Company documents and information (including confidential information) are proprietary—that is, they contain sensitive information critical to the conduct of the Company's business. Information entrusted to the Company by a third party may also be identified as proprietary, confidential or secret and must be handled according to instructions provided by the owner. Information of this kind must be protected against unauthorized disclosure or misuse.

Examples of proprietary information include:

- major reorganization plans
- information about new technology
- marketing strategies, bids and proposals
- legal proceedings
- business partner records
- sensitive human resources information
- internal audit reports and significant corporate security matters
- training material
- computer software programs (even routine programs)

Depending on the type of information at stake, unauthorized disclosure or misuse of proprietary information can have serious consequences for the Company: for example, the Company could be placed at a competitive disadvantage; its financial stability could be affected; it might be exposed to legal liability; or its corporate image could be compromised.

We are all responsible for protecting proprietary information, whether originated by the Company, or entrusted to the Company by a third party, by taking the following steps (among others):

- Before disclosing any proprietary information, ensuring that an appropriate Non-Disclosure Agreement or other agreement is in place to ensure that the confidentiality of the information is maintained by the recipient.
- Classifying and marking documents with the appropriate proprietary notice.
- Making sure all proprietary information, whether stored on paper, on computer or in other electronic form, is kept secure.
- Avoiding unauthorized disclosure of proprietary information; for example, checking that computer terminals and telephones used to send and receive information are secure.
- Avoiding the discussion of such information in public places, (including taxis, trains and airplanes) with family members or friends who might pass the information on to others deliberately or unintentionally, or with business colleagues when our conversations might be overheard. Remember that cellular telephones do not provide a secure method of communication.
- Returning all proprietary information and documents provided by the Company, including all third party information entrusted to the Company, upon termination of employment or contract, or reassignment.

Any attempt to obtain proprietary information by unauthorized means or to misuse such information should be reported to a manager immediately.

Please refer to the Company's [Data Responsibility Policy](#) for further information.

For example:

***How do I tell if a document (paper or electronic) is proprietary if it is not marked as such?***

You should begin by asking the person who issued the document if known, as the disclosing party is the person who must determine the classification. If you can't find the source of the information and the nature of the document does not make the classification obvious (such as information that has been made public), the document should be treated as confidential until the proper classification is determined.

***What should I do if I discover that a Company trademark has been infringed or misused?***

Trademarks, along with the Company logo and Company trade names, are among our most valuable assets, and every employee has a responsibility to preserve, protect and enhance these assets. You should immediately report any infringement

or misuse of a Company trademark or trade name, as well as the Company logo, to the Legal Department.

## DEALING WITH CUSTOMERS, COMPETITORS, AND BUSINESS PARTNERS

To achieve a sustained and enduring competitive advantage, we must ensure that our reputation for quality, service and integrity remains unimpeachable. The best way to maintain our reputation—and strengthen our competitive advantage—is to compete fairly and vigorously while complying fully with our legal and ethical obligations. Fair competition means that we respect our customers, business partners, competitors, agents and all alliance partners.

### Relations with customers and business partners

Our Company's service often involves a visit to a customer's or business partner's place of business. Over the years, we have acquired an enviable reputation for honesty, courtesy, integrity and respect for property in dealings with customers and business partners. With vigorous competition in the marketplace, this reputation has become more valuable than ever. Employees must never act in a manner that compromises this hard-earned reputation.

In addition, it is important that we choose our business partners carefully, as their actions may impact the Company's reputation and even result in legal ramifications for the Company. As a result, we must ensure that we conduct reasonable and appropriate due diligence on our business partners prior to engaging them, and monitor their activities on an ongoing basis. Please refer to the Company's [Anti-Bribery Policy](#) for further guidance.

### Selling our products and services

Our customers and business partners trust us to provide quality products and services, and be truthful when discussing our advantages and benefits. To maintain that trust:

- We offer only those services which we are legally allowed to provide, either alone or through contract with an alliance partner or agent, at approved rates and charges, where applicable.
- We sell only those products and services our customers and business partners want and need.
- We promote our products and services accurately, truthfully and honestly, and never engage in misleading advertising or marketing.
- We give customers and business partners the facts about their competitive choices.
- We guide customers and business partners into asking the right questions about their competitive options.

- We don't offer to waive charges, cut special deals or grant discounts that are not authorized; we don't do anything that suggests we are "buying business". Depending on the products and services involved, this kind of behavior could violate provisions of applicable anti-competition and anti-bribery laws; as a result, the Company and possibly the employee might be subject to legal action. Please refer to the Company's [Anti-Bribery Policy](#) for further guidance.

### Treating competitors with respect

We welcome and encourage competition and we are committed to treating competitors with due respect. By doing so, we honor the competitive spirit that motivates us to perform at our best.

We have a responsibility to portray our competitors fairly, accurately and without bias. Acting otherwise could result in charges of anti-competitive behavior, and possibly in lawsuits.

Behaving competitively means that:

- We do not portray a competitor to the public or to a business partner in an inaccurate, misleading, disparaging or unfair manner.
- We do not state as a fact our understanding of a competitor's price information as that information may be out of date and incomplete.
- We are careful about commenting publicly, or to a customer or business partner, on such topics as a competitor's financial situation, business practices, management reliability, or foreign ownership. It is often hard to pin down the correct facts about these matters, and we can be accused of misrepresentation. The best source of information about a competitor comes from the competitor itself. If facts about a competitor are public knowledge, direct the business partner to the source of this information (i.e., newspaper report, magazine article, social media post, or TV or radio news item).
- We do not behave spitefully or disrespectfully toward a customer or business partner who has decided to purchase a competitor's products or services; we continue to rigorously promote and provide high-quality service for any other product we may supply to this customer or business partner.

### Obtaining information about our competitors

We have every right to gather information about the marketplace in which we operate. This includes information about our competitors, their products and services, technology, prices, advertising, and so on. However, we must only obtain this information through legal and ethical channels. Acting otherwise is against the law and may result in prosecution. As a result, we will not do the following:

- We do not engage in industrial espionage.

- We do not buy illegal proprietary competitive intelligence (such as marketing plans, sales strategies, etc.).
- We must never induce another employee to obtain confidential information, nor must we request or induce the employee of a competitor to provide such information.

For example:

*Our business unit recently hired someone who held an executive position with one of our competitors. This person was deeply involved in planning the competitor's expansion strategy, and he has information which would be very valuable to us. Can we ask him to disclose this information?*

Absolutely not. The new employee has an obligation to protect his former company's confidential or proprietary information, just as you would be obliged to protect Absolute's confidential or proprietary information if you were to leave the Company. You must respect the employee's personal integrity as well as his obligation to his former employer. In such a case, the Company could face liability for inducing a breach of the new employee's obligations to his former employer.

### When a competitor is a business partner

In our competitive environment, competitors are also our business partners. When serving business partners who are also competitors, we must never use information obtained as a result of providing service to the competitor in any manner which would give us an undue competitive advantage.

### Reciprocity

Like many corporations, we purchase goods and services from thousands of suppliers, many of whom are also our business partners or customers. One of the most delicate questions in purchaser-supplier relationships is reciprocity—the promotion of sales through the use of purchasing power.

Reciprocity is an arrangement that both a purchaser and a supplier might be tempted to seek. For example, we, as a purchaser, might consider giving our business to a supplier who happens to be our business partner or customer, in preference to another supplier who is a competitor's business partner or customer. Similarly, a supplier may demand that it get our business because it is one of our major business partners or customers.

While we quite naturally want to do business with our business partners and customers, and will take advantage of every opportunity to do so, we must keep in mind that this should not be done at the expense of price, quality and service. These criteria, rather than the simple fact a supplier is or is not our business partner or customer, should guide our purchasing decisions.

Reciprocity, whether it originates with the buyer or the seller, should be handled with utmost care for a number of financial,

ethical and legal reasons. Under certain circumstances, we may, for strategic marketing reasons, develop and contract services exclusively with a given supplier. The Chief Financial Officer or Chief Executive Officer must be consulted before all such arrangements are established.

### Collusion

The Company is committed to complying with all laws and regulations designed to preserve free and open competition (also referred to as "antitrust", "monopoly" or "anti-competition" laws). We will avoid even the appearance of agreeing with a competitor to limit how we compete with one another, including avoiding any discussion of the following with competitors:

- pricing or pricing policy, costs, marketing, or strategic plans
- agreeing on the prices we will charge customers
- agreeing to divide customers, markets, territories, or countries
- boycotting certain customers, vendors, or competitors

If a competitor attempts to discuss any of the above with you, stop the conversation immediately and report the situation to your manager.

It is important for all employees to understand that the mere exchange of information can create the appearance of a common understanding among competitors that could result in allegation of anti-competitive behavior, which could lead to serious sanctions against the Company and damage to its reputation. We must always be cautious when interacting with competitors at public events such as conferences or trade shows.

## SAFEGUARDING COMPANY ASSETS

We all have a responsibility to safeguard Company assets. This is crucial to maintaining the trust and confidence of shareholders, as well as others who have a stake in the Company. The improper use and/or reporting of assets could seriously undermine the Company's integrity, adversely affect our business strategies and decisions and weaken investor confidence. It could also constitute a criminal offense.

Each of us is accountable for the protection of the Company's assets in our care, both physical (material, buildings, people, property, information, revenues) and logical (communications networks, information systems, intellectual property). Access to and use of these assets must be authorized, adequately controlled and based on business needs. Use for personal purposes of the Company's assets is strictly prohibited (unless specifically provided in a separate Company policy). Each of us must also take appropriate measures to prevent losses due to willful action by others, both outside and within the Company,

which may result in personal injury, property damage, theft, loss, abuse or unauthorized access to physical or logical assets, and intellectual property (including data). This applies to assets located in the office, at home or on business partner premises.

Upon termination of employment or contract, or reassignment, we must return all physical and intellectual property of the Company or entrusted to the Company in our possession.

It is our duty to promptly report to Human Resources, and in the case of IT assets such as laptops and mobile cellular devices, to Global IT, all acts that may constitute real or suspected breaches of security.

### Funds

We must properly use and protect Company cash, cheques, postage, etc., and ensure that all expense vouchers, benefit claims and invoices are accurate and properly authorized.

We must provide receipts and/or explanations for all expenses incurred on behalf of the Company.

We must charge all transactions to the appropriate accounts. We may only use corporate credit cards, and other corporate financial tools for business purposes.

We should, whenever possible, use the services of business partners with whom the Company has negotiated agreements (for example, travel agents, car-rental agencies, hotels, etc.).

Please refer to the Company's [Corporate Travel and Expense Policy](#), [Expense Authorization Policy](#), and [Purchase Order Policy](#) for further guidance.

### Books and records

The Company's books and records contain vital information about all aspects of our operations. They form the basis upon which key decisions about the Company are made—whether internally, by Company executives and other management staff, or externally, by financial analysts, shareholders, investors, regulators, and so on.

Because they are so crucial to the proper running of our business, we must ensure that all documents, reports and records falling under our responsibility are accurate and complete. We must also ensure that all transactions are properly authorized and recorded. Please refer to the Company's [Anti-Bribery Policy](#) for further guidance about record-keeping.

In preparing and maintaining our books and records, we will:

- Adhere to all accepted accounting standards and practices, rules, regulations and controls applicable to us.
- Ensure that all entries are recorded accurately and on time, in the proper accounts, and are properly documented.
- Keep books and records which reflect fairly, accurately and

in reasonable detail the Company's transactions, acquisition and disposal of assets and other relevant activities.

- Sign and submit only those documents we believe to be accurate and truthful, not only internally but also to the Company's auditors and securities regulators.
- Restrict access to sensitive or confidential information (such as financial records and business partner information) to ensure the information is not accidentally or intentionally disclosed, modified, misused or destroyed.
- Ensure, through an internal control process, that the Company meets its book- and record-keeping obligations.

In addition, we will retain all documents that relate to any imminent or ongoing investigation, lawsuit or audit involving the Company, and we will never destroy, conceal or alter any documents or records in order to impede, avoid or interfere with a government or regulatory authority's investigation, lawsuit or audit. Engaging in such activity may expose the Company and the employee to criminal liability. We will fully comply with all government and regulatory investigations, inquiries and litigation requests. Records will always be retained or destroyed according to the Company's document retention policies or procedures. Refer to the Company's [Email Retention Policy](#) for further guidance.

## IT and network security

Computers, mobile cellular devices (including smartphones and tablets) and computer networks have become an essential feature of our workplace. Indeed, they form the very backbone of our network and operations infrastructure. For this reason, every effort must be made to protect the Company's computer systems, computer network, IT assets and associated software and hardware from the various threats to their security, such as accidental or deliberate destruction of data and equipment, interruption of service, disclosure of sensitive information, unauthorized access, theft and corruption.

Please refer to the Company's [Information Security Policy](#), [Email Use Policy](#), [Internet Use Policy](#), [Corporate Mobile Cellular Device Policy](#), [Bring Your Own Device \(BYOD\) Policy](#), [Instant Messaging \(IM\) Policy](#), [Remote Access Policy](#), [Removable Media Policy](#), and [Data Responsibility Policy](#) for further guidance.

## Intellectual property

Intellectual Property is amongst the most valuable assets of the Company. Protecting our innovation and our brands enhances our competitive edge and solidifies our freedom to operate.

All intellectual property such as inventions, works and other intellectual property assets conceived or made during or after working hours in the course of our employment with

the Company, or which is within the scope of the Company's business interests, are rightly the property of the Company.

We are prohibited from disclosing the Company's proprietary information and intellectual property such as trade secrets, inventions, marketing plans, etc. outside the Company without ensuring that the proper safeguards and legal documentation are in place. Failure to do so could make the Company lose its right in a trade secret or its right to file a patent for an invention.

Employees are prohibited from attempting to apply in their own name for a patent or other type of protection of intellectual property, such as a trademark, domain name, industrial design or copyright registration, in relation to an invention, work or other intellectual property that we conceived or made during or after working hours in the course of our employment with the Company, or which is within the scope of the Company's business interests, or to make use of it for personal gain.

We must fully disclose to our manager all intellectual property that we conceived or made during or after working hours in the course of our employment, or which is within the scope of the Company's business interests, and such works are hereby automatically assigned to the Company, without limitation as to territory, duration or otherwise, all rights, including intellectual property rights, in and to all such intellectual property, without charge, in order to enable the Company to, among others, apply for patents in the Company's name in any country.

All moral rights that we may have under the Copyright Act (Canada) (or any successor or similar legislation in other jurisdictions or at common law) in, or related to, the intellectual property that we conceived or made during or after working hours in the course of our employment with the Company, or which is within the scope of the Company's business interests are irrevocably waived in favor of the Company and its affiliates.

During ,and if necessary after the conclusion of, your employment with the Company, you must cooperate fully in the preparation and execution of all necessary documents if the Company decides to use/sell the intellectual property or to apply for protection, registration or enforcement of intellectual property rights.

You may apply to be released from the obligation to assign specific intellectual property rights to the Company. Each case will be examined on its own merit and the Company will be reasonable in this regard.

## Visible ID

Every employee, consultant and contractor must wear a valid, designated ID card at all times while on Company premises. Visitors must wear a valid, designated visitor's card while on Company premises and employees should challenge anyone on Company premises not wearing one.

## Contract and agreement standards

Contracts and agreements (including click-through agreements and binding online terms and conditions) represent some of the greatest exposures faced by the Company. They also represent a great opportunity for the Company to minimize retained risks. If you are in a position to develop, negotiate or sign contracts, you must take necessary steps to protect the interests of the Company by ensuring that the contract is reviewed by the Company's Legal Department before execution. Only certain individuals are authorized to sign and bind the Company to contracts (including click-through contracts and online terms and conditions). You must not sign any contracts, order forms, or other documents, or click-through any online agreements, on behalf of and in the name of the Company unless you are an authorized signatory. If you have any questions regarding signing authority, please contact the Legal Department.

It is a violation of Company policy for any employee to enter into a Side Agreement. A "Side Agreement" is any agreement, term, promise, or commitment (whether written or oral, whether in the form of a letter or formal agreement or in the form of any exchange of physical or electronic communications) by or on behalf of the Company (or any subsidiary, director, employee or agent of the Company) with a customer, distributor, partner or the like (collectively referred to in this section as a "customer") that is not contained in an approved and authorized written agreement with the customer, or purchase order from the customer, which has been generated by or delivered to, and approved by, the Company's Legal Department. The definition of a Side Agreement is not limited by any particular subject matter. By way of example, Side Agreements include any agreement not contained in a purchase agreement that relates to return rights, acceptance rights, future pricing, payment terms, free consulting, committed development, free training, free maintenance, free extensions on support, other free services, exchange rights, any commitments or concessions to deliver additional, upgraded or enhanced products in the future outside of the Company's formal agreement, commitments or concessions which deviate from the requirements of the Company, or the laws and regulations of the applicable country.

For clarity, any Side Agreement, and all terms thereof, must be made clear to the Company's Legal Department and approved by that department in advance. It is every employee's responsibility to fully understand this policy on Side Agreements, and any employee with knowledge of or questions about Side Agreements or this policy this should contact the Company's Legal Department for clarification.

## Communicating to the media and the public

As a company whose shares are traded publicly, the Company must provide timely, accurate, consistent, complete and fair disclosure of information to enable investors to make informed

market decisions, and the Company is required to comply with continuous disclosure obligations by securities regulators and applicable stock exchanges.

Any public written or verbal communication that can be attributed to the Company or to an employee may amount to public disclosure. This includes not only regulatory filings such as financial statements and annual reports, but also other communications such as news releases, interviews, speeches, articles and reports. Disclosing inappropriate or inconsistent information could damage the Company's reputation, and could also cause the Company to be in violation of its obligations under securities laws.

As a result:

- All public communications, including to the media, must only be made on behalf of the Company by authorized spokespersons or with the prior approval of the relevant internal departments such as Marketing and Legal.
- Any media or investment inquiries should be reported promptly to the Marketing department for further handling and response.
- Exercise caution when making statements at external events such as conferences or trade shows, and take care not to say anything that may disclose non-public information or inaccurate information, or that might cause harm to the reputation of the Company.
- When using social media, follow the Company's **Employee Social Media Policy**.

## A WORK ENVIRONMENT BASED ON TRUST AND RESPECT

Nothing is more basic to ethical behavior than trust and respect. A work environment that encourages and values trust and respect also makes good business sense: it enables us to build and cultivate more meaningful, richer relationships with fellow employees, business partners and shareholders.

The Company is committed to fostering such a workplace, one which:

- recognizes the intrinsic dignity and worth of all employees
- values, encourages, and leverages the diversity of all employees, business partners and shareholders
- enables all employees to work without fear of intimidation, discrimination, harassment, bullying, or violence
- encourages open and honest communication
- makes reasonable effort to accommodate the particular needs of all employees
- enables all employees to work safely

## Diversity in the workplace

Diversity is defined as an unwavering respect for each other's

uniqueness. Culture, ethnicity, gender, age, religion, disability, sexual orientation, education and experiences are just some of the facets of diversity. By valuing our differences, we can create an inclusive work environment based on merit and fairness where all employees can contribute to their fullest potential. We will also more closely mirror the communities and business partners we serve.

Treating each other with respect and dignity is the basis to attaining our diversity objectives, which are to be:

- the employer of choice, able to attract and retain the most talented employees;
- the Company of choice by successfully anticipating the emerging demands of an increasingly diverse customer base and labor market; and
- the leading innovator in the industry.

### Employment equity

Absolute is an equal opportunity employer. Absolute will recruit, retain and promote employees without regard to race, color, national origin, religion, sex (including pregnancy or childbirth) or gender, sexual orientation, age, disability, marital or parental status, genetics, past or present military status, or any other status protected by the laws or regulations in the locations where we operate.

Employment equity is an important aspect of our diversity strategy. The Company complies with employment equity requirements aimed at removing barriers to recruiting, retaining and promoting members of designated minority groups. Employment equity is not about hiring unqualified individuals but rather to ensure that the qualified members of the designated groups are given equal employment opportunities.

### Discrimination and harassment

We prohibit all types of unlawful discrimination, including harassment, whether directed against an individual or group, including employees, customers, business partners and shareholders. This specifically includes discrimination based on race, color, national origin, religion, sex (including pregnancy or childbirth) or gender, sexual orientation, age, disability, marital or parental status, genetics, past or present military status, or any other status protected by the laws or regulations in the locations where we operate.

Harassment is defined as any behavior, sometimes repetitive in nature, which denies individuals the dignity and respect to which they are entitled because the behavior is offensive, embarrassing and humiliating. It may take different forms, such as:

- threats, intimidation or verbal abuse
- unwelcome remarks or jokes about subjects like your race,

religion, disability, gender, sexual orientation, or age

- unnecessary physical contact, such as touching, patting, pinching, or punching
- displaying sexist, racist, or other offensive pictures, posters, emails, or screen displays
- any other action that may reasonably be perceived as offensive or degrading.

Sexual harassment includes behavior of a romantic or sexual nature that creates an intimidating, unwelcome, hostile or offensive work environment, or that could reasonably be thought to put sexual conditions on a person's job or employment opportunities.

A few examples are:

- questions and discussions about a person's romantic or sexual life
- commenting on someone's sexual attractiveness or unattractiveness
- displaying posters, calendars, and/or screen displays of a sexual nature
- writing notes, letters, or emails of a romantically or sexually suggestive nature

### Workplace violence and bullying

We all have a right to work in an environment free from violence, bullying and threats. The Company prohibits all acts of physical, verbal or written aggression or violence committed by one employee against another or against anyone else an employee could come in contact with when carrying out his or her responsibilities.

We believe that all employees should be able to work in an environment free from workplace bullying. Bullying consists of acts or verbal comments that could mentally hurt or isolate a person in the workplace, although it can sometimes involve negative physical contact as well, such as pushing or throwing objects.

Bullying may involve repeated incidents or a pattern of behavior that is intended to intimidate, offend, degrade or humiliate a particular person or group of people, possibly in front of other employees, customers or business partners. However, bullying can also occur as a single incident.

The following are examples of workplace bullying behaviors:

- social isolation (silent treatment) or deliberate exclusion
- spreading rumors
- excessive teasing or personal attacks about a person's private life and/or personal attributes
- excessive, unjustified, demeaning, or humiliating criticism, public criticism, or trivial fault-finding
- belittling or disregarding opinions or suggestions

- verbal aggression or intimidation
- trivializing of work and achievements
- over-monitoring of work
- withholding information
- replacing proper work with demeaning jobs

Context is important in understanding bullying, particularly verbal communication. There is a difference between friendly teasing exchanged by long-time co-workers and comments that are meant to be, or are taken as being, demeaning or abusive. In addition, interpersonal conflicts between an employee and his or her co-workers are not generally considered bullying unless the conflict results in behavior that is considered threatening or abusive.

### Complaint procedure for discrimination, harassment, and bullying matters

As mentioned in the sections above, the Company does not tolerate discrimination, harassment or bullying of any kind. The Company is committed to providing a safe, violence-free, harassment and bullying free workplace and strictly prohibits employees, contractors, consultants, customers, vendors, suppliers, visitors, or anyone else on Company premises or engaging in a Company-related activity from behaving in a harassing, violent or threatening manner and strictly prohibits all such behavior. This policy includes interpersonal and electronic communications such as email.

Employees should not assume that the Company is aware of a problem and are encouraged to utilize the procedures set out below to bring any problems to the Company's attention. The Company provides multiple avenues for individuals to raise their concerns in a way that is most comfortable to them. Complaints may always be made by contacting Human Resources at +1-604-630-2290, or [hrconfidential@absolute.com](mailto:hrconfidential@absolute.com).

If the Company determines that discrimination, harassment or bullying has occurred, remedial action may be taken appropriate to the circumstances. Any employee who has participated in discrimination, harassment or bullying will be subject to disciplinary action, up to and including termination. The complaining employee may be informed of the outcome of the investigation as appropriate.

**An individual who reports incidents that he or she, in good faith, believes to be violations of the Company's discrimination, harassment or bullying policies, or who is involved in the investigation of discrimination, harassment or bullying, will not be subject to reprisal or retaliation.**

Retaliation is a serious violation of this Code and should be reported immediately. The report and investigation of allegations of retaliation will typically follow the procedures set forth in below, as appropriate to the circumstances. The procedures outlined below may be adjusted in particular

circumstances to ensure compliance with applicable legal requirements. Any person found to have retaliated against an individual for reporting discrimination, harassment, or bullying, or for participating in an investigation of allegations of such conduct will be subject to disciplinary action.

#### Step one: informal verbal process

If you are being bullied, harassed or have been a victim of violence, or if you observe the bullying or harassment of or violence against another employee, start by following the informal process below:

- Inform the person perpetuating the actions immediately that their actions are not acceptable to you as soon as they start to occur.
- Describe the specific actions that they took that caused you to feel uncomfortable. When confronted, in many instances, the person will stop. Sometimes a person is not aware that they are acting in an unacceptable manner. This may also prevent the act from escalating and possibly becoming dangerous.
- It is important to keep a record of dates and times where you have spoken to the person who has committed the act of bullying, harassment or violence and inform your manager or Human Resources what occurred.

#### Step two: formal written process

Where bullying, harassment or violence has either continued to occur after a conversation with the individual or was extreme or dangerous in nature, employees are required to report it immediately and following the process below:

- Speak with your manager or with Human Resources, or another member of Management where your manager is the cause of concern, and report the incident.
- Write out a statement detailing the incidents including:
  - The names of the parties involved;
  - Any witnesses to the incident(s);
  - The location, date, and time of the incident(s);
  - Details about the incident (behavior and/or words used); and
  - Any additional details that would help with an investigation.
- A fact finding investigation will be instigated.
- Where it is determined that the person has contravened the law, the appropriate authorities will be contacted.
- All complaints will be taken seriously and investigated fairly.
- Employees that submit a report or complaint of bullying, harassment or violence in good faith will not be subject to any form of reprisal or retaliation as a result of the complaint.

- Confidential reporting can also be submitted by emailing [hrconfidential@absolute.com](mailto:hrconfidential@absolute.com)

### Step three: investigation

If the Company becomes aware of any forms of harassment, bullying or violence, an investigation will ensue. Employees are asked to provide as much detail as possible to assist with the investigation. All investigations will be conducted as confidentially as possible. Most investigations at the Company will be conducted internally. In complex or sensitive situations, an external investigator might be hired. Investigations will:

- be undertaken promptly and diligently, and be as thorough as necessary, given the circumstances;
- be fair and impartial, providing both the complainant and respondent equal treatment in evaluating the allegations;
- be sensitive to the interests of all parties involved, and maintain confidentiality;
- be focused on finding facts and evidence, including interviews of the complainant, respondent, and any witnesses; and
- incorporate, where appropriate, any need or request from the complainant or respondent for assistance during the investigation process.

Investigations will typically include interviews with the alleged target, the alleged bully, and any witnesses. If the alleged target and the alleged bully agree on what happened, then the Company may not investigate any further, and will determine what corrective action to take, if necessary. The investigator will also review any evidence, such as emails, handwritten notes, photographs, or physical evidence like vandalized objects.

The alleged bully and alleged target may be advised of the investigation findings as appropriate in the circumstances. The Company will keep a confidential, written record of investigations, including the findings. Human Resources will review and, if necessary, revise workplace procedures to clarify expectations regarding bullying and harassment incidents in the workplace.

### Step four: remedial action

Appropriate corrective actions will be taken within a reasonable time frame. If the Company determines that violence, harassment or bullying has occurred, remedial actions will be taken appropriate to the circumstance. Any employees who participate in such activities will be subjected to disciplinary action, up to and including termination.

### Complaint procedure for other matters

Problems, misunderstandings, and frustrations may arise in the workplace. The Company recognizes that attention to, and

resolution of, employee concerns results in a more harmonious and productive work environment. The Company seeks to provide a procedure for an employee to present his or her work-related concerns to management and resolve them internally and at the lowest level possible. Therefore, any employee who is confronted with a concern and feels that he or she is in need of conflict resolution for reasons not involving discrimination, harassment, bullying or matters relating to the Company's **Whistleblower Protection Policy** is encouraged to raise their concerns promptly and professionally using the following guidelines for procedure (as appropriate in the circumstances), for resolution of the issue(s). In turn, Absolute will appropriately investigate and respond to such concerns, and will not retaliate against an employee who utilizes this procedure.

### Step one: informal verbal process

Employees should first attempt to resolve their issue with the other party. If that is not feasible or if the employee does not feel comfortable doing so, the employee's manager should be the first source of assistance and the employee should address his or her issue verbally with their manager. However, if the complaint is with the employee's manager, then the employee should schedule an appointment with the next level of management to discuss his or her issue.

The manager should investigate and determine a response to the complaint and communicate it verbally to the employee who has raised the conflict (and the other party or parties to the conflict if deemed appropriate).

### Step two: formal written process

If a discussion with the manager does not resolve the problem to the satisfaction of the complaining employee, or if the manager does not respond to the complaint in a timely manner, the employee may submit a written complaint to the employee's manager or vice president and a copy should be forwarded to Human Resources. The complaint should include:

- a description of the problem and date the incident occurred;
- the date the employee met with his or her manager to discuss the incident and context of the manager's verbal response to the incident; and
- suggestions on ways to resolve the problem.

Upon receipt of the formal complaint, the manager or vice president will work with Human Resources to schedule a meeting with the employee to discuss the complaint. Human Resources, working with the manager or vice president should investigate, determine a response, issue a decision and inform the complainant of that decision.

If the employee remains dissatisfied with the manager or vice president's decision, he or she may appeal this decision in

writing to the Head of Human Resources, requesting further investigation of the complaint. The Head of Human Resources will direct the Company's investigation, involving other parties as deemed appropriate. After conducting this investigation, the Head of Human Resources will determine a response to the complaint and issue a decision in writing, which will be discussed with the complainant (and the other party or parties to the conflict, if deemed appropriate).

### No retaliation

The Company will not retaliate against the complainant for filing a good faith complaint and will not knowingly permit retaliation by any employee of the Company. The Company will also protect employees and applicants from coercion, intimidation, interference or discrimination for filing a complaint with any regulatory agency or in assisting with a legitimate investigation by such agency.

### Reasonable accommodation

Accommodation is a part of a broader principle, namely, that our society should be structured and designed for inclusiveness. An accommodation is required or requested by an employee is considered reasonable if it does not entail undue hardship, such as: significant financial cost, impact on business operations, or risk to the health and safety of the employee concerned or other employees.

Some examples of reasonable accommodation are:

- Physical or technical alterations that can be made to an employee's workspace. For example, work station height, non-standard computer monitor, telephone with amplifier or headset, etc.
- Modification of work duties or conditions. For example, modification of standard working hours or position duties, to accommodate the medical conditions of those employees who have made a declaration of their needs.
- Providing documentation in alternate formats. For example, Braille or other accessible media.

Please refer to the Company's [Accessibility Policy](#) for further guidance.

### Occupational health and safety

We are committed to maintaining a safe and secure work environment. This holds true whether employees are working on the Company premises or at a customer or business partner's place of business.

To this end, we must:

- Follow all proper Company procedures when carrying out our jobs.
- Comply with all Company policies regarding health and safety issues.

- Comply with all relevant laws and regulations governing workplace health and safety.
- Wear prescribed safety equipment.

We regard health and safety as a corporate priority. We will ensure that effective policies and practices are in place to protect the health, safety and well-being of employees, customers, business partners and the public.

Where employees are concerned, the Company expects each person to take personal responsibility for their health and safety, while working safely at all times. The Company will:

- provide a healthy and safe work environment to reduce the risk of illness or injury
- meet or exceed all health and safety legal requirements
- provide proper supervision, training and equipment in this area, and
- timely and appropriately resolve any issues.

Mindful of the safety of its customers, business partners and the public, the Company will also:

- ensure business decisions made at all levels of the organization take into account the Company's health and safety commitments
- cooperate with applicable government and other organizations on health and safety matters, and
- require contractors to follow all relevant legal and contractual guidelines

### Corporate security—emergency management

In today's business world, employees could encounter various emergency situations that may impact themselves, and/or the Company. To this end, the Company is committed to ensuring that appropriate Emergency Procedures are adopted for each of its offices, and that employees are aware of the Emergency Procedures applicable to their office.

### Attendance at work

Attendance at work is mandatory for employees, unless an employee is absent due to medical reasons or another permitted type of leave, or has the approval of their manager. Employees are expected to attend work on time, and to work diligently and professionally.

Frequent unauthorized absences or tardiness for any reason can have an adverse effect on an employee's ability to satisfy job requirements and meet performance expectations. Unacceptable attendance includes, but is not limited to, the following:

- Repeated, unplanned absences or tardiness resulting in work or services being delayed, rescheduled, or not completed when expected.

- Absences or tardiness that place a continuing undue hardship on other employees to make up or adjust for the lost time.

If an employee must be absent for planned purposes, he or she must notify his or her manager and obtain approval in advance. If possible, planned time off should be scheduled to minimize disruption to operations. For unplanned absences, an employee must notify his or her manager as soon as possible and no later than the beginning of their scheduled workday.

In addition to providing proper notification of absences, employees should recognize the importance of regular and punctual attendance. Absenteeism results in inconvenience and extra work for co-workers and disruption to Company operations.

Company reserves the right to require an employee to produce a medical doctor's certificate for any absence due to illness or injury of the employee or family member.

An employee will normally be deemed to have voluntarily terminated his or her employment with the Company if he or she is absent three or more consecutive business days without reporting to or notifying his or her manager. In such a case, the employee's resignation will typically be processed by the Company.

Excessive absenteeism may result in disciplinary action up to and including termination. Each situation is reviewed on a case-by-case basis and remedial action will be taken by the Company in its sole discretion.

### Alcohol, drugs, and other substances

The Company is committed to the health, safety and well-being of its employees, its customers, business partners and the public. As part of this commitment, the Company makes every reasonable effort to minimize risks associated with its operations and to ensure a safe, healthy and productive workplace. These principles apply to all of us, to all locations where the Company business is being conducted, to all activities on all Company work premises or other work locations during working hours. We are expected to act responsibly during Company-related business, social, and recreational events.

We are required to be fit at all times to perform all assigned duties. While at work, we must not be impaired by the use of intoxicating substances, such as alcohol, marijuana, medication, illegal drugs or controlled substances. The act of smoking, of any type, is not permitted in any of the Company's offices.

The use, sale, unlawful possession, manufacture or distribution

of illegal drugs, controlled substances or non-prescribed medications for which a prescription is legally required, whether on Company work premises or other work locations, is strictly prohibited.

We have the responsibility to determine any potential adverse effects when using prescribed or over-the-counter medications with the assistance of our doctor or pharmacist. Intentional misuse of prescribed or over-the-counter medications is strictly prohibited.

### No Scents is Good Sense Policy

The Company strives to ensure the comfort and safety of our employees and visitors by encouraging an environment free from smoke, fragrances, chemical-based and scented products, and unpleasant smells. These odors are distracting and may trigger allergic reactions or create health issues such as the onset of respiratory distress and headaches. Employees, visitors and guests are strongly encouraged to avoid or minimize the use of fragrances or scented products at all Company offices. This includes all noticeable odors from any sources, such as perfumes, colognes, deodorants, air fresheners, and other personal items. In order to protect individuals from developing such sensitivities, we ask for your cooperation towards a fragrance/scent-free environment in the workplace.

### Personal Appearance

Employees are permitted freedom in their clothing selection. However, since each employee is a representative of the Company, personal appearance is meant to be a reflection of our professionalism and the customers that we serve. A few guidelines have been established to ensure this philosophy is met:

- Basic appearance should always be neat, clean and of a professional nature, and appropriate to the employee's role, working environment, and particular activities.
- When interacting with customers, suppliers, or business partners, employees are always expected to dress professionally and appropriately. Employees who interact with customers should maintain an exceptionally neat appearance.
- Any markings, jewelry or clothing that in any way conveys negativity to any category protected by applicable employment laws (such as race, gender, etc.) is prohibited.
- All employees are expected to wear the appropriate safety clothing or personal protection devices for the job(s) they perform. Nothing should be worn which violates or compromises any of our safety rules or regulations.

## Involvement in a legal matter

If you are involved in a legal matter or police case you must immediately inform your manager if this involvement has the potential to affect your ability to perform your job fully and competently. If you are summoned for jury duty, please notify your manager or HR.

## Employee, contractor, and job applicant privacy

Please refer to the Company's [Employee, Contractor and Job Applicant Privacy Policy](#) for further guidance regarding the Company's policies and practices relating to the collection, use, disclosure and protection of employees', contractors' and job applicants' personal information.

Notwithstanding the notion of employee personal information, there shall be no expectation of privacy for communications made through the use of Company equipment (for example, e-mail, text message, internet/intranet activities, voice mail, computer files and external drives), as well as workspaces (i.e. desks, file cabinets, etc.). Please refer to the Company's [Email Use Policy](#), [Internet Use Policy](#), [Corporate Mobile Cellular Device Policy](#), [Instant Messaging \(IM\) Policy](#), and [Remote Access Policy](#) for further guidance.

The Company reserves the right to monitor or search any and all Company property at any time, where it determines on reasonable grounds (and in accordance with applicable laws) that this is required; for example:

- to evaluate and measure service quality
- in the interests of the safety and protection of employees or the Company
- in the event the Company suspects an employee of fraud, theft, undeclared conflict of interest or other situation which may cause prejudice to an employee or the Company or its reputation

In addition, the Company reserves the right (and in accordance with applicable laws) to install video surveillance cameras within any Company office, in order to ensure the security of Absolute's facilities, infrastructure, operations and equipment, and also the safety of its employees. Please refer to the Company's [Video Surveillance Policy](#) for further guidance.

## Off-duty conduct

While the Company does not seek to interfere with the off-duty and personal conduct of its employees, certain types of off-duty conduct may interfere with the Company's legitimate business interests. For this reason, employees are expected to conduct their personal affairs in a manner that does not adversely affect the Company's integrity, reputation or credibility. Off-duty conduct on the part of an employee that creates a conflict of off-duty interest or adversely affects

the Company's reputation or legitimate business interests or the employee's ability to satisfactorily perform his or her job will not be tolerated, and such employees may be subject to disciplinary action, up to and including termination.

## PROTECTING THE ENVIRONMENT

We believe that environmental protection is an integral part of doing business and the Company is committed to minimizing, through a continuous improvement process, the impact that some of its activities, products or services could have on the environment.

In support of its commitment, the Company will:

- Exercise due diligence in its approach to meet or exceed the requirements of all applicable legislation.
- Prevent, control and reduce releases of hazardous substances into the environment.
- Promote and support cost-effective resource and waste minimization initiatives.
- Prefer to deal with business partners who seek to minimize their environmental impacts.
- As appropriate, participate with governments, businesses, the public and relevant interest groups to advance environmental protection.

All environment-related incidents and infractions must be reported to Human Resources immediately once discovered.

## ANNUAL REVIEW

We are all expected to review the Code and all other Company policies set out in the Employee Policy Handbook once a year, and certify that we have done so by signing the [Acceptance of Absolute Policies](#). This form is kept in every employee's personnel file.

By providing your annual certification, you are certifying that you have read, understood and will comply with the principles set out the Code and all other Company's policies set out in the Employee Policy Handbook.

You are also certifying that you have reported to your manager any circumstances that you are aware of that are or could constitute a conflict of interest, a violation of this Code or of any other Company policy (including violations by you), and that you will report any new situations immediately as they occur to your manager or Human Resources.

## RESOURCES

If you have any questions regarding the issues raised in this Code, or to report unethical or illegal behavior such as corporate

fraud, or to report any conflicts of interest or other topics covered in this Code, or to report any breaches of this Code or the Company's **Anti-Bribery Policy**, or to raise concerns regarding the Company's accounting, internal accounting controls or auditing matters:

- speak to your manager,
- contact Human Resources at +1-604-630-2290 or [hrconfidential@absolute.com](mailto:hrconfidential@absolute.com),
- send an email to [whistleblower@absolute.com](mailto:whistleblower@absolute.com), or
- send an anonymous message to the Chairman of the Audit Committee at [absolutesoftware@whistleblowersecurity.com](mailto:absolutesoftware@whistleblowersecurity.com)

Code approved by: Board of Directors

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