

# Code of Ethics and Business Conduct

Check Point is a worldwide leader in developing security solutions to protect business and consumer transactions, and communications over the internet. Our goodwill and reputation are affected by what we do every day. By putting our commitment in writing we clearly set out the business practices that we follow and set clear standards of behavior for everyone associated with our organization.

Throughout this Code of Conduct, Check Point promotes these core principles:

- Honest and Ethical Conduct
- Integrity
- Open Communication
- Equal Opportunity and Diversity

This Code was created to benefit our employees, customers, partners, shareholders and other stakeholders. Check Point strives to promote this common set of values and establish uniformity within the entire company. This Code of Ethics demonstrates our commitment to act responsibly and in accordance with all relevant laws and regulations.

The Code applies to all Check Point employees, officers and directors in all business areas and locations. It also applies to contractors working on a regular basis with Check Point. If you are ever in a situation where you are not sure what to do or how to act, please contact the VP of Human Resources and/or the General Counsel. Their contact information is provided at the end of this Code.

## **Honest and Ethical Conduct**

We expect employees to conduct themselves in a respectful, honest and ethical manner and with full integrity. Always strive to be open, honest, and respectful in your relationships with customers, co-workers and others, in sharing ideas and thoughts, and in receiving input.

## **Compliance with Applicable Laws**

Check Point must comply with applicable laws and regulations. We expect our employees to respect and follow the laws of their home countries and of the countries where they conduct business.

## **Confidentiality**

Most Check Point employees handle confidential information relating to the Company's operations. Confidential information is defined as any information that is not generally known outside of the Company. Examples include:

- Financial Information, Costs, Business Projections, Marketing Plans
- Information, names and details of our customers, suppliers, partners and employees

- Product Design, Software Code, Technology we develop (anything with a copyright, trademark or patent), trade secrets, and design documents
- Any information or process that is specific to the way we perform our business

If you learn or work with this type of information, you must keep it confidential. It is necessary to ensure our success. Confidential information has substantial value to Check Point and you must not disclose it to an unauthorized person or anyone outside of Check Point (including partners, customers, suppliers etc.), unless required by law, or disclosed in accordance with company policy. If you are unsure whether information is considered confidential, you must consult with your supervisor. Information about third parties that is not publicly known must be handled responsibly and in accordance with any applicable Check Point's agreements. You should not publish any information about third parties unless you have been specifically authorized to do so.

Conversations, presentations and communication in the workplace are part of our normal working activities. Accordingly, you are not permitted to record (in any format) conversations, presentations and communications in work place without the explicit written consent of all participants. Online sessions may be recorded for educational purposes and use only, provided that all participants have been made aware of such recording.

Please contact Check Point's legal department for any questions about these confidentiality agreements.

## **Conflict of Interest**

Conflict of interest situations may occur when your private interests interfere or conflict with Check Point's interests. While such potential conflict of interest situations may promote the business of the company, they require proper disclosure and will be decided upon on a case by case basis. The decision maker will in no way be the person involved in the conflict of interest situation. Some examples of conflict of interest situations include:

- Promoting your personal interest or promoting a business decision based on a personal interest
- Family/Friendship relationships with Check Point's suppliers, customers and partners
- If a family member and/or friend is hired as an employee or as a contractor or is providing services to Check Point

You should properly disclose to the VP of Human Resources and/or the General Counsel any circumstances and report all facts relating to relationships or financial interests that may give rise to conflicts of interest. Directors and members of senior management should make similar reports to Check Point's Audit Committee ("Audit Committee") and the Board of Directors through the General Counsel.

## **Use of Suppliers**

You should not conduct and/or be involved in any engagement which may create a conflict of interest. You may engage with Check Point's suppliers for purchase of consumer products and services if you are offered standard market terms or terms which are similar to those offered to Check Point. In case you are offered non-standard favorable terms, you are required to disclose the matter to the General Counsel/VP of Human Resources.

## **Signing a Contract**

You should not sign agreements, legal documents or letters on behalf of Check Point, unless you obtain prior legal approval. Agreements and legal documents should be signed by Check Point's authorized signatories only. Employees may not sign any contract and/or document on behalf of Check Point, in which they may (a) have personal interest; (b) for their own benefit; or (c) the contract/document is signed with a third party who is a family member and/or friend and/or a company owned or managed by a family member and/or friend.

## **Additional Employment**

In general, Check Point does not permit its employees to engage in employment outside of the company. Separate employment (with or without compensation) should be disclosed and approved by the VP of Human Resources and/or General Counsel. Check Point encourages its employees to take part in volunteering in charitable organizations.

## **Equal Opportunities**

Check Point strives to provide equal opportunity to both applicants and employees, and a work environment free from discrimination. We value and foster the talent and diversity of our employees and ensure that they are given fair and equal opportunities. Decisions regarding employment in Check Point are based on fair and relevant consideration only.

Our policy prohibits any and all forms of discrimination in the workplace. Any employee who believes that he or she has been the subject of any prohibited discrimination is strongly encouraged to immediately report it to the VP of Human Resources and/or the General Counsel.

## **Harassment**

Check Point prohibits any form of harassment by its employees, officers, directors and contractors, and in particular sexual harassment. Sexual harassment may include applying any force of a sexual nature, unwelcome sexual advances, requests for sexual favors, inappropriate promise of rewards in exchange for sexual favors, and other verbal or physical harassment of sexual nature. We take allegations of harassment seriously and take severe actions against anyone harassing another in the workplace.

## **Anti-Corruption**

Check Point prohibits the following activities:

- Corruption of government officials in any form
- Payments of bribes of any kind (whether in dealings with public officials or private individuals)
- Any business related payment by or to Check Point personnel which was not authorized in advance by Check Point
- Any undisclosed commissions (or a commission in excess) to a third party for obtaining any business

Anyone can report conduct they believe is corrupt to the General Counsel and/or VP of Human Resources anonymously.

## Gifts and Gratuities

Under no circumstances, may anyone acting on behalf of Check Point accept any offer or payment or anything of value from customers, vendors, consultants, etc. Examples include:

- Personal benefits (gifts such as money, goods or services)
- Free services, discounts, loans
- Lavish entertainment or other special favors
- Anything else that could be perceived as, or is intended to, directly or indirectly, influence any business decision

**Exception:** Inexpensive gifts worth less than US \$100, infrequent business meals (not more than 6 times a year), and celebratory events and entertainment. You are required to make proper disclosure to VP of Human Resources and/or General Counsel regarding any gifts that do not fall under the exceptions, or any other benefits which you think may be improper. You may also consult with the General Counsel regarding whether a specific payment or gift violates this policy.

## Use of Corporate Assets

We expect all employees to use company resources in a responsible and ethical manner. Unless you receive the prior written consent of the General Counsel/VP of Human Resources, you should not:

- Use corporate property, assets, information or position for any personal gain, or for any unlawful purpose
- Compete with Check Point's business directly or indirectly
- Exploit opportunities that are discovered through the use of corporate information or position

## Insider Trading

If you have access to non-public information regarding Check Point (or any other company), you are not permitted to use or share that information for purposes of trading securities of Check Point (or any other company). It is unethical and illegal to use non-public information for financial benefit or to "tip" others who might make an investment decision on the basis of this information. Check Point employees must comply with our policy regarding insider trading.

## Record Keeping

Check Point requires honest and accurate recording and reporting of information in order to make responsible business decisions. This includes documenting business expenses accurately and obtaining the necessary authorization for approving such expenses, as well as maintaining detailed and accurate records, accounts and financial statements confirming with both legal requirements and internal policies.

For reporting accounting and audit concerns, please refer to our “Whistle Blower Procedure” on Check Point’s Wiki page.

## **Reporting Illegal or Unethical Behavior and Code Violations**

If you become aware of any illegal or unethical conduct, or possible violation of this Code, you should report the information to the General Counsel. You may also:

- Consult with VP of Human Resources and/or the General Counsel if you are unsure about the best course of action in a particular situation
- Use Check Point’s “open door” policy to continue to raise the matter to higher levels of management, including ultimately to the Chief Executive Officer and the Board
- Cooperate in internal investigations of misconduct

Senior financial officers and directors should report any known or suspected violation of this Code by any senior financial officer to the Board or the Audit Committee of the Board.

Our policy prohibits any and all forms of retaliation against anyone who: (a) in good faith provides any information or reports any such corrupt conduct and/or activity; or (b) makes a good faith and appropriate complaint regarding violation of this Code; (c) assists in any investigation.

Any employee who believes that he or she has been the subject of any retaliation is strongly encouraged to immediately report it to the VP of Human Resources and/or the General Counsel directly. Any claims will be confidential and conducted with a full and fair investigation.

## **Adherence to Code Provisions**

You are expected to read and understand this Code, to follow its principles and standards and comply with any training requirements provided by Check Point. Check Point may impose sanctions including dismissal, report to the relevant authorities, etc., for violations of this Code as appropriate under the circumstances.

Check Point is committed to ensuring that all employees and contractors working on a regular basis with Check Point, carry out their work in accordance with this Code and will provide them with suitable training, according to the requirements of their roles and responsibilities.

Check Point is committed to maintaining the highest ethical standards and ensuring transparency in all its operations. To demonstrate this commitment, Check Point’s General Counsel oversees and monitors compliance with this Policy. In addition, Check Point’s General Counsel perform periodic reports to Check Point’s Audit Committee regarding the implementation and effectiveness of this Policy as well as the policies and procedures put in place to ensure compliance with this Policy. The Legal Department is responsible for ensuring that the Check Point complies with all applicable laws and regulations. The Legal Department also conducts annual training for employees on various compliance matters, including Check Point’s Code of Ethics and Business Conduct.

## **Contact Information**

For proper disclosure, reporting and consulting on any questions regarding the Code of Ethics and Business Conduct, please email [ethics@checkpoint.com](mailto:ethics@checkpoint.com).

You may also contact the General Counsel or VP of Human Resources:

General Counsel: [shiray@checkpoint.com](mailto:shiray@checkpoint.com)

VP of Human Resources: [Yiftahy@checkpoint.com](mailto:Yiftahy@checkpoint.com)

Directors and members of senior management may report violations of this Code to any of the above email addresses or directly to the Board or the Audit Committee of the Board.

Reporting in relation to the “Whistle Blower” procedure should be directed to Mr. Yoav Chelouche, Chairman of the Audit Committee, whose contact information is as follows: Email: [yoav@avivvc.com](mailto:yoav@avivvc.com).

This Code does not constitute a complete list of company policies. Check Point may update this Code and/or publish additional ethical policies, rules and guidelines from time to time. This Code can also be found in Check Point’s Wiki page and it has been translated into six languages: German, Chinese, Spanish, Japanese, French and Italian.

For additional information and more detail on the subjects addressed in this Code of Ethics and Business Conduct, please see our following policies which can be found at our ESG Port:

- Anti-Corruption, Bribery and Money Laundering Policy
- Privacy Policy
- Whistle Blower Procedure
- Workforce Diversity and Equality Statement
- Training and Employee Development Policy
- Social Investment and Volunteer Statement
- Supply Chain Code of Conduct
- Supply Chain Policy
- Human Rights and Labor Policy
- Corporate Responsibility Policy
- Insider Trading Policy

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