



Code of Conduct and Business Practices

1. Scope and purpose

This Code of Conduct and Business Practices ("Code") establishes the ethical standards, policies, and responsibilities that all RAD employees, partners, and stakeholders are expected to uphold. It serves as a guide to maintaining integrity, professionalism, and compliance with legal and ethical obligations in all business activities.

RAD is committed to the highest level of integrity in the conduct of business. The company believes that compliance with the highest standards of ethical conduct is critical to maintaining trust and credibility with customers, partners, suppliers and employees, as well as being key to the company's long-term success.

This document outlines the principles of ethical conduct and details the company policies in various related areas.

Every RAD employee is expected to conduct themselves and their business in line with this Code at all times. Managers in particular must lead by setting an example for other employees. Beyond legal compliance, all RAD employees are expected to observe high standards of business and personal ethics in the performance of their assigned duties and responsibilities. This requires the practice of honesty and integrity in every aspect of dealing with other company employees, customers, suppliers, the public, the business community, shareholders, and governmental and regulatory authorities.

2. Ethical Conduct Policy

2.1 Compliance with the Law

RAD's policy is to observe and comply with all national and international laws applicable to the Company and the conduct of business in all countries where it provides products or services. The Company's goal is not only to comply with the minimum legal requirements, but also to lead in corporate ethical behavior, driven by the Company's responsibility and commitment to good citizenship.

2.2 Treating Employees Equally and with Respect

All employees enjoy are entitled to basic human rights and should be treated with dignity and respect in the workplace. They should not be unreasonably interfered with in the conduct of their duties and responsibilities due to prejudices or biases. All employees are entitled to freedom of thought, conscience, religion, and expression provided these do not interfere with the rights of others.

RAD is committed to equality of opportunity in all its employment practices, policies and procedures. No employee should be discriminated against because of age, race, gender, religion, disability, sexual orientation, marital or maternity status, political opinion or ethnic background.

RAD respects the privacy of its employees, customers and suppliers and is extremely careful when processing personal information. All personal data collected and held by RAD is handled with confidentiality and sensitivity to safeguard individual privacy.

RAD employees should never engage in abusive or intimidating behavior toward others in the workplace, such as sexual harassment, physical confrontation or verbal hostilities that could create a hostile or offensive work environment. Any violation of the policy will subject an employee to disciplinary action as determined by RAD. No person will be adversely affected in employment with RAD as a result of bringing complaints of unlawful harassment.

2.3 Non-Forced labor

RAD prohibits the use of forced or bonded labor. All employees shall have the right to enter employment voluntarily and freely, without the threat of a penalty.

The policy is applicable to all personnel as well as interns, consultants and any other person performing a task in the Company.

The Company's principle of "No Forced Labor" principle is based on International Labor Organization (ILO) conventions and national laws, while recognizing regional and cultural differences.

The Company forbids the use of coercion, violence, threats, or other intimidating practices like confiscation of personal documents or withholding wages.

Employees shall have the freedom to terminate employment by providing reasonable notice (in accordance with national law or mutual agreement) at any time without penalty.

All terms and conditions of service should be specified in employment contracts, and employees must provide informed consent.

The Company recognizes the responsibility it shares with suppliers, sub-contractors, and recruitment services (collectively referred to as "Suppliers") to tackle forced labor.

The term "Forced Labor", as used in this Code, encompasses all forms of forced labor, including but not limited to: child labor, human trafficking (e.g. derived from migration for employment), involuntary prison labor, coercion in wage payment or document retention. All labor should be freely chosen, and employees should be free to

leave in accordance with their employment contract.

2.4 Fair Business Practices

The success of RAD depends on its ability to outperform our competitors; however, the Company is committed to achieving success using fair, honest and ethical means.

In order to continue to maintain RAD's reputation for fair dealing among our customers, partners, competitors and the public, all employees should adhere to the following principles:

- 2.4.1 **Fairness to customers** – All customers and partners should be treated equally and fairly. Conflicts between channel partners or customers should be resolved on the basis of equality, fairness and the long-term interest of the Company.
- 2.4.2 **Honesty and truthfulness** – Information regarding the company, its technology, products, quality, timetables and other business-related issues should never be misrepresented or manipulated.
- 2.4.3 **Unfair competition** – Employees should never make defamatory or false statements regarding the financial solvency, competence, quality or integrity of other companies. Employees should never misappropriate trade secrets or knowingly misuse a competitor's confidential information.

2.5 Prohibition of Corrupt Practices

RAD and its employees should not demand or accept, offer or give any kind of bribery, kickback, payoffs or any other illegal or unethical benefits, and should never be involved in any corrupt business practices.

The use of company funds for political contributions to any organization or to any candidate for public office is strictly prohibited.

2.6 Conflicts of Interest

Employees should make or participate in business decisions and actions based on the best interests of the Company as a whole, and not based on personal relationships or benefits, and they should avoid any activity that might lead to a conflict of interest.

Some examples of conflicts of interest:

- 2.6.1 **Business Opportunities** - Making profit, or assisting others to profit, from opportunities that are discovered through the use of corporate information or position.
- 2.6.2 **Business Relationship with Other Companies** – Involvement in business relationship with RAD customers, partners, suppliers or competitors. Any outside business

interests that divert time and attention away from RAD responsibilities.

- 2.6.3 **Personal Relationship with Other Parties** - Making business decisions involving RAD and another party, while having personal relationship (family, friends) with the other party.

In the event that a conflict arises between the interest of an employee and the Company, the employee must immediately notify his or her superior in full and in writing, and disengage themselves from any involvement in the matter.

2.7 Tips, Gratuities and Gifts

As part of RAD's Marketing and promotion efforts, employees are permitted to offer to customers, potential customers or business partners only modest tips, gratuities, hospitality (such as dining in a restaurant), gifts or invitations to entertainment events, and only if such offering is legal under applicable local or national laws. "Modest" value is defined as less than \$100 per year per business associate (not including business meals).

Gifts, invitations or hospitality offered to RAD employees in connection with their business activity, might be accepted only if such gifts and invitations have no influence on the employee's decision-making. Any such gifts or invitations should be less than \$50 per year per business associate (not including business meals).

2.8 Use and Protection of Company Assets

RAD has a wide variety of assets, including physical assets, proprietary information and intellectual property. RAD's assets should be used only for lawful and proper Company purposes.

- 2.8.1 **Physical assets** - Equipment, materials and other physical assets should be handled and cared for properly and should be used only for RAD's business purpose. They should not be used for personal benefit, sold, loaned, given away or otherwise disposed of, regardless of their condition or value, without proper authorization.
- 2.8.2 **Confidential or Proprietary Information** – RAD recognizes the importance of Intellectual Property rights and other proprietary or confidential information to any company. RAD and its employees shall take every appropriate action to preserve and enhance its Intellectual Property, while respecting the Intellectual Property rights of others. RAD employees should never access or use confidential or proprietary information for any purpose other than as required for the performance of their duties, and should never disclose such information, either during or after employment, without Company authorization to do so. This policy covers also

confidential or proprietary information of any company with which RAD has signed a contract or an NDA.

- 2.8.3 **RAD's IT and Communication Systems** –Employees should not use RAD's communication systems for sending, retrieving, accessing, displaying, storing, printing or otherwise disseminating material and information that is fraudulent, harassing, threatening, illegal, racial, sexually oriented, obscene, intimidating, defamatory or otherwise inconsistent with a professional and ethical conduct.

2.9 Internal Accounting Controls & Procedures for Financial Reporting

Company's policy is to maintain a system of internal accounting controls to ensure reliability and adequacy of the Company's books and records and proper recording of all transactions including dispositions of assets. The Company has adopted and implemented internal accounting controls, procedures and records to ensure, inter alia, the flow of information from all levels of the Company to the Company's Chief Financial Officer (“**CFO**”) and the CEO. These internal accounting controls, procedures and records are based on the following principles: A. **Authorization & Approval**. The transactions that are entered into, and recorded, by the Company in its books and records are those that specifically, properly and formally approved by a designated appointed director, officer or employee. Such approval shall be in accordance with the procedures and policies of the Company. B. **Accounting**. The Company will record in its books and other records all the transactions that entered by the Company. C. **Independent Auditors**. Company's books and records shall be available for review and audit by the company's Independent Auditors, for the purpose of the preparation of the Company's financial reports.

2.10 Internal Reporting of Criminal Acts Committed by Employees

As part of this code of ethics, each employee of the company is required to report to HR or to Legal department or to their department managers, on facts or circumstances that reasonably indicate that company employee has committed, is committing, or will commit one or more of the specified crimes below: Crimes involving intentional infliction or threat of death or serious physical harm, Crimes involving Stealing Money, Crimes involving Stealing company equipment, unauthorized disclosure of classified information, False Financial reporting, Sexual harassments, Bribery and corruption, any violation of Law, Noncompliance with the company code of Ethics.

See 3.4 - Reporting and Investigating Code Violations

2.11 Suppliers

RAD will do its utmost to work only with subcontractors and suppliers who conduct themselves with the highest standards of human rights, honesty, fairness and integrity, maintain high ethical standards, adhere to all applicable laws and avoid any corrupt practices.

2.12 Confidentiality and Data Protection

RAD employees are expected to handle confidential business information and trade secrets with care. Protecting proprietary company information, customer data, financial records, etc. is essential to maintaining trust and business integrity. Employees should be mindful of their responsibilities and adhere to all applicable data protection laws and company policies when handling sensitive information. If there are any uncertainties, employees are encouraged to seek guidance from management to ensure compliance and safeguard the company's interests.

2.13 Conflict of Interest

Employees should avoid situations where personal interests might conflict with those of the company. Employees must disclose potential conflicts to management.

2.14 Environmental and Social Responsibility

RAD is committed to sustainability and responsible business practices. Employees should minimize waste, reduce environmental impact, and follow all applicable environmental regulations.

2.15 Prevention of Money Laundering

RAD is committed to preventing money laundering and upholding the highest standards of financial integrity. We have implemented robust policies, procedures, and controls designed to detect, deter, and report any attempts to conceal the origin, ownership, or destination of funds derived from illegal or dishonest activities. By rigorously monitoring transactions and maintaining strict due diligence practices, we ensure that our sale of products or services are never used to disguise criminal proceeds or integrate them into legitimate economic activities. Our dedication to compliance not only protects our business and stakeholders but also contributes to the broader fight against financial crime.

2.16 Compliance and Review of Public Communications

RAD commits to ensuring that all advertising statements and public disclosures shall be accurate, lawful, and non-misleading in every material respect. Further, any such publication shall undergo an internal review by the relevant subject-matter department prior to its official release.

2.17 Prohibition of Extortion and Embezzlement

RAD maintains a zero-tolerance stance toward extortion and embezzlement in any form. Employees, contractors, and business partners must never solicit, coerce, misappropriate, or divert company funds or

property for personal gain. All suspected incidents must be reported immediately through the established whistleblower channels and will be investigated promptly. Violations may result in termination, legal action, and referral to law enforcement authorities.

3. Implementation of Policy

3.1 Coverage

The commitment to comply with this Code extends to all RAD employees on all matters, including decisions relating to trade, investment, subcontracting, supplying, business development, and in all other business and employment relationships.

RAD is aware that questions of interpretation may arise in specific instances, particularly regarding the need to balance local customs and requirements of some countries with global standards and guidelines. RAD will do its utmost to resolve any identified ethical, legal, environmental, employment, and human rights issues, which seem to conflict with this Code.

3.2 Distribution of Information

The Code will be added to the employment agreement, and all new employees shall approve by signing the agreement that they read the Code. In addition, the Code and any amendments thereof are posted on RAD's web site. Once a year, the Code will be refreshed to all employees of the Company.

3.3 Responsibility

It is the responsibility of each RAD employee to promote and follow this Code. Questions about the application or meaning of any provisions of this Code should be addressed to the General Counsel.

All managers of the Company are responsible for the enforcement of, and compliance with, this Code, including its necessary distribution and training to ensure employees' knowledge, understanding and compliance. Managers who become aware of a code violation by their subordinates should report it immediately to one of the Company's VPs.

Non-compliance with this Code may result in disciplinary measures up to and including termination or legal action against the violating employee.

Any noncompliance with the Code or applicable law should be reported to the General Counsel. In case of noncompliance by a VP – it should be reported to the CEO (at udy_k@rad.com) and the General Counsel; In case of noncompliance of the CEO – it should be reported to the Chairperson of the Board (at litalfa@radware.com) and the General Counsel, and in case of noncompliance of a director – to the CEO and the General Counsel.

Employees concerned of such noncompliance should report their complaints immediately on either an anonymous or non-anonymous basis as follows: (1) by e-mail, to Yael Langer, General Counsel at: yael.l@rad.com; or to the CEO – udy.k@rad.com; or to the Chairman of the Board – litalfa@radware.com (2) by postal mail, to RAD, 24 Raoul Wallenberg Street, Tel Aviv 6971923 Israel Attention: General Counsel; or by postal mail, to 8 Kehilat Saloniki Street, Tel-Aviv 69513 Israel for the attention of Yael Langer; or (3) by telephone, to Yael Langer +972-50-7469523 or 03-6455292

3.4 Reporting and Investigating Code Violations

Any report by an employee who knows or believes that another employee of the Company has violated RAD's code of ethics, information security or employees' privacy should be made to the employee's supervisor or to the Human Resources Department or to one of the Company's VPs.

Any report of possible violation shall be investigated thoroughly and treated with the utmost care in confidentiality.

RAD shall not discharge, demote, suspend, threaten, harass or in any other manner discipline, discriminate or retaliate against any employee because he or she reported any violations. However, the Company may take disciplinary action against an employee who provides an incorrect report on violations of the Code if the report was not made in good faith.

3.5 Questions, Suggestions and Modifications

Any questions, suggestions for changes or additions to this Code should be addressed to the General Counsel.

The Company may amend this Code from time to time with or without notice.