

GENIXYS LLC SOFTWARE TECHNOLOGIES

PARTNERS CODE OF CONDUCT

Genixys LLC including its subsidiaries believes that the success of our business and the strength of our relationships are directly related to our actions. For this reason, we've established high ethical standards and guiding principles for how we operate, and we expect each of our partners to meet these principles and standards. This partners Code of Conduct (the "Partner Code") describes the principles standards by which our partners must operate and to which they will be held accountable.

This Partners Code applies to all GeniXys suppliers of products or services, including consulting firms, and independent contractors, regardless of their title or the product or services they provide ("Partners"). In your capacity as a Partner, we expect you to know and follow all domestic and international laws and regulations that apply to your work and business locations.

While this Partners Code may serve as a guide, it is not intended to cover every applicable scenario or address every situation that may arise. You are expected to use good judgement in line with the highest standards of ethics and integrity to which GeniXys has committed. You are expected to raise questions/concerns or seek additional guidance on appropriate conduct when a particular situation arises that may not be addressed in this Partners Code.

1. COMPLIANCE WITH APPLICABLE LAWS, RULES AND REGULATIONS

GeniXys expects in Partners to comply with both the letter and spirit of all laws, rules and regulations applicable to each Partner's business as is conducted generally and specifically with GeniXys.

Disregard of laws, rules or regulations are not tolerated, and violation of domestic or foreign laws, rules and regulations may subject an individual, Partner, as well as GeniXys, to civil and/or criminal penalties, fines or restrictions.

2. ANTI-CORRUPTION COMPLIANCE

We have a zero-tolerance policy toward bribery or any form of corruption. Partners, or their employees, officers or anyone on their behalf, may not offer, provide, or promise anything of value (including business courtesies) to anyone, including government officials or GeniXys employees, to improperly obtain or retain business or to obtain an unfair commercial advantage.

GeniXys also prohibits Partners from making facilitation payments (i.e., payments to a government official to expedite or secure a routine non-discretionary governmental action) in connection with GeniXys business.

All business courtesies provided by Partners related to its business with GeniXys – including gifts (whether money or another thing of value), hospitality, entertainment, events, travel, or accommodation – must be reasonable and appropriate, in strict compliance with relevant laws and recipient policies, have a clear business purpose, and be supported by required documentation.

Bribes, facilitation payments and kickbacks are violations U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act of 2010, Israeli Penal Law 5737-1977 and other similar international anti-corruption laws. Penalties for violation of these are severe and may include fines and incarceration.

3. EXPORT, CUSTOMERS, TRADE CONTROL AND ANTI-MONEY LAUNDERING

GeniXys expects its Partners to fully comply with all applicable export, customs and trade control laws and regulations, including economic and trade sanctions laws and any licensing requirements applicable.

We also expect our Partners to comply with all applicable anti-money laundering laws and regulations, and GeniXys' Anti-Bribery and Corruption Handbook available at our website.

4. CONFLICT OF INTERESTS

Partners must avoid actual or potential business or financial conflicts of interest involving GeniXys such as instances where the Partner's personal interests (including interests of the Partner himself or the Partner's employees, officers, or directors) conflict or appear to conflict with GeniXys' interests. A conflict of interest

may also arise whenever an action you have taken prevents you from objectively and honestly performing your duties and responsibilities to GeniXys. Any actual or potential conflicts of interest must be promptly reported to GeniXys.

5. INSIDER TRADING

As a Partner of GeniXys, you may have access to material non-public information about GeniXys and its subsidiaries. The United States and many other countries have insider trading laws that restrict trading of securities by anyone who is aware of material non-public information.

Partners may not purchase or otherwise trade in GeniXys securities, directly or indirectly, while in possession of “material non-public information” about GeniXys. Information is deemed material if it could reasonably be expected to affect the price of shares or that a reasonable investor would find significantly alters the total mix of information.

GeniXys as well as insider trading laws and regulations also prohibit Partners from “tipping” others (e.g., family or friends) regarding material non-public information about GeniXys.

6. ANTI-TRUST, COMPETITION AND FAIR DEALING

GeniXys expects its Partners to comply with applicable antitrust and competition laws designed to protect and promote free and fair competition, particularly as it relates to GeniXys. Partners must not enter into any agreements or understandings with competitors in violation of relevant antitrust laws (e.g., fix prices, exclude competition, bid rig, limit production, etc.). In addition, Partners may not exchange certain kinds of information, such as pricing and production information with competitors, regardless of how innocent or casual the exchange may be.

Partners must also deal fairly with GeniXys and others related to the GeniXys relationship. Partners must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information (including but not limited to competitively sensitive information), misrepresentation of material facts, or any other unfair dealing or practice.

7. RECORD MANAGEMENT AND RECORDING TRANSACTIONS

GeniXys relies on its Partners books and records to report our financial results, make required legal filings and make business decisions. As such, Partners are expected to record and report information related to their business in general and especially their business with Tufin accurately and honestly, and to make and keep books, invoices, records, and accounts that accurately and fairly reflect their financial transactions in accordance with standard accounting practices.

Partners must not falsify documents, transactions, or accounting records related to GeniXys and must strive to promote financial integrity throughout their business and financial reporting. Partners are responsible and shall fully comply with any requirements to file timely reports with government agencies and make disclosures that are accurate, balanced, complete and understandable.

8. CONFIDENTIAL INFORMATION

Partners are required to protect GeniXys’ confidential information, as well as the confidential information of its customers, suppliers, shareholders, employees, or other third parties that disclosed or made information available in confidence. Confidential information should be interpreted broadly to include any proprietary information or information not generally available to the public, in any form or any medium and material non-public information in particular.

Partners also must not directly or indirectly exploit for personal gain any information or opportunities that are discovered because of the Partner’s relationship with GeniXys.

Partners must apply prevailing industry standards with regard to the installation and operation of information security measures, for both computer systems and portable electronic devices, to protect against malware and unauthorized disclosure of any proprietary information and other program related information provided by GeniXys. If there is a suspicion that a possible data security breach has occurred, it is critical that such circumstance be immediately reported in writing to GeniXys LLC.

9. PRIVACY

GeniXys LLC is committed to protecting confidential and sensitive information and expects its Partners to uphold that commitment. Partners must comply with all applicable laws and regulations regarding the protection of personal information or other sensitive or protected information and assist GeniXys in complying with its own obligations in this regard. Partners must notify GeniXys immediately in the event of an actual or suspected data breach resulting in the dissemination of personal information relating to GeniXys or its subsidiaries management or employees.

10. HUMAN RIGHTS, EMPLOYEE RELATIONS AND NON-DISCRIMINATION

Partners must comply with all applicable human rights laws prohibiting child, forced, indentured, or involuntary labor.

GeniXys expects its Partners to conduct themselves in a professional manner with courtesy and respect for others. We do not tolerate harassment by our Partners in any form, including verbal, physical, or sexual harassment.

Partners must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits.

GeniXys is committed to providing equal opportunities in employment, development, and advancement for all qualified persons – and we expect our Partners to share that commitment. Tufin does not tolerate unlawful discrimination by its Vendors.

11. ENVIRONMENT, SAFETY AND HEALTH

Partners must uphold high regard for the safety and well-being of their employees, customers and the general public. We expect our Partners to operate in compliance with the letter and spirit of applicable environmental and workplace health and safety laws and regulations.

12. USE AND PROTECTION OF GENIXYS ASSETS

Partners may only use GeniXys' assets for legitimate GeniXys business, including both tangible (e.g., computers, vehicles, supplies) and intangible (e.g., know-how, trademarks, patent information) assets. If GeniXys provides Partners with access to GeniXys computers or systems (including e-mail), these devices and accounts are to be used for appropriate business purposes only and may be monitored/inspected by GeniXys.

13. MARKETING MATERIALS AND MEDIA INTERACTIONS

GeniXys LLC controls the release of any marketing materials, press releases or media interviews that include a reference to GeniXys, our subsidiaries, affiliates, customers and partners. Any such release requires advanced written approval by GeniXys' management.

14. REPORTING CONCERNS

You are expected to self-monitor your compliance with this Partners Code and promptly report any integrity concern involving or affecting GeniXys. When requested, you are expected to assist GeniXys in investigating concerns.

15. AMENDMENT

GeniXys is committed to continuously reviewing and updating its policies, and GeniXys' management reviews the Partners Code on a regular basis. Therefore, GeniXys may amend this Partners Code at any time and for any reason. Partners must comply with the then current version of the Partners Code of Conduct.

Last Update: 29 January 2024
