



CODE OF CONDUCT

The objective of the Code of Conduct

At Surfshark, we are committed to fostering an environment that reflects integrity, respect, innovation, and transparency. Our Code of Conduct serves as a guide to help us operate responsibly, ethically, and in alignment with our mission to build the most beloved security products for everyone.

This Code applies to everyone within the Surfshark community: employees, contractors, partners, and stakeholders. It provides clear expectations on professional behavior, ethical practices, and how we treat each other, our customers, and the broader community.

This Code of Conduct serves as a beacon for how we work, collaborate, and grow as a team – always striving to uphold the highest ethical standards in every interaction and create a culture of trust and accountability.



About Surfshark

Surfshark is a cybersecurity company that offers a range of tools to enhance online privacy and security. These tools include a VPN, Antivirus, data leak monitoring tool Alert, private Search tool, online identity and email generator Alternative ID, and phone number masking tool Alternative Number. Surfshark also offers a personal data removal service called Incogni, as well as Ironwall, a solution designed to protect employees by removing personal information from the internet.

Founded in 2018, Surfshark provides services designed to encrypt internet traffic, protect users' personal data, and enable unrestricted access to the internet. Driven by the vision of a world where everyone feels secure in their digital rights, Surfshark strives to make the complex world of online security simple and accessible for all.



Adhering to the highest standards of regulation and compliance

At Surfshark, we uphold the highest regulatory compliance standards and ethical conduct across all operations. Our responsibility to follow applicable laws, regulations, and industry standards ensures we remain a trusted provider of secure and privacy-focused digital services. By adhering to these standards, we safeguard the rights and interests of our customers, partners, and stakeholders.

We proactively monitor the evolving regulatory landscape to ensure our services meet all relevant legal requirements. This includes rigorous adherence to data protection laws such as the General Data Protection Regulation (GDPR), compliance with international security frameworks, and dedication to protecting user information at every level. Our team is trained to implement these regulations effectively, fostering a culture of accountability and transparency.

Compliance is a collective responsibility at Surfshark, led by our Legal team. We maintain clear policies, provide regular training, and encourage open communication to ensure our staff has the knowledge and resources to meet these obligations. Additionally, we regularly audit our processes to identify and mitigate risks, ensuring continuous improvement in our compliance practices.

Business ethics

Upholding strong business ethics is crucial for earning trust and fostering lasting relationships with customers, partners, and employees. This means adhering to local laws and cultural norms while staying committed to universal principles of justice and equality.

Our ethics framework is grounded in several key principles:

- ✔ **Customer-centricity:** we put our customers at the heart of everything we do, striving to meet their needs with honesty and excellence;
- ✔ **Integrity:** we conduct business honestly and fairly, building trust through transparency;
- ✔ **Accountability:** we take responsibility for our actions and decisions, fostering a culture of continuous improvement and ownership;
- ✔ **Respect for privacy:** we prioritize safeguarding user data, ensuring regulatory compliance, and protecting digital rights;
- ✔ **Anti-corruption:** we avoid all unethical practices, including bribery and fraud, while promoting transparency and fairness in every interaction;
- ✔ **Equity and inclusion:** we promote fairness, diversity, and inclusivity, creating a workplace where everyone feels valued and empowered;
- ✔ **Environmental responsibility:** we actively explore sustainable practices, map our environmental impact, and contribute to a better future.

These principles are not static — they evolve with our company and the world around us. By regularly reviewing and strengthening our policies, providing ongoing employee training, and welcoming feedback from our stakeholders, we ensure that these ethics remain at the heart of everything we do.

Workplace and employee treatment

We are committed to a workplace where every employee feels valued, respected, and empowered. By aiming for high standards, we strive to be better than we were yesterday. We take ownership of our tasks and duties, promote collaboration through teamwork, and keep an open mind by welcoming diverse perspectives and feedback. This ensures everyone has the opportunity to thrive and contribute to our shared success.

Core Principles of employee treatment:

- ✓ **Fair compensation and benefits:** we provide competitive and fair compensation that reflects the value of our employees' contributions. In addition, we offer comprehensive benefits to support their wellbeing, including health, professional development, and work-life balance initiatives;
- ✓ **Professional growth and development:** Surfshark invests in training programs, mentorship, and career growth opportunities to help our employees achieve their professional aspirations;
- ✓ **Open communication and feedback:** transparency is key to a strong, collaborative workplace. We maintain open channels for communication, encouraging employees to share ideas, concerns, and feedback with the option to stay anonymous;
- ✓ **Diversity, equity, and inclusion:** we celebrate the unique perspectives, backgrounds, and talents each employee brings to our team. We are committed to maintaining an inclusive environment where everyone, regardless of gender, race, ethnicity, religion, age, sexual orientation, or ability, feels welcome and valued;
- ✓ **Zero tolerance for harassment or discrimination:** Surfshark enforces a strict zero-tolerance policy for harassment, bullying, or discrimination. All employees have the right to work in a respectful and supportive environment;
- ✓ **Safe work environment:** we prioritize employees' physical and mental health. We ensure that our workplaces meet the highest safety standards and offer resources to support mental health, stress management, and personal growth.

Expectations for suppliers and other business partners

We hold ourselves to the highest ethical, regulatory, and operational standards, and we expect the same commitment from our suppliers and third-party partners. Surfshark may periodically review and monitor suppliers and third parties to make sure our set expectations are being met.

Our key expectations from suppliers and third parties include:

- ✓ **Quality and reliability:** we expect suppliers to consistently deliver high-quality products and services, meeting agreed-upon standards and timelines;
- ✓ **Compliance with laws and regulations:** suppliers and partners must comply with all applicable laws, regulations, and industry standards, including data protection regulations such as GDPR, anti-corruption laws, and labor laws in their jurisdictions;
- ✓ **Commitment to privacy and security:** suppliers must implement robust measures to safeguard data, protect user privacy, and maintain the confidentiality of any shared information;
- ✓ **Ethical business practices:** adhering to high ethical standards is essential, including avoiding bribery, corruption, and fraudulent activities;
- ✓ **Respect for human rights:** suppliers must ensure fair labor practices, uphold human rights, and provide safe, inclusive, and non-discriminatory working environments for their employees. Forced labor, modern slavery, child labor, and any form of exploitation are strictly prohibited;
- ✓ **Business continuity and adaptability:** suppliers should maintain business continuity, effectively manage crises, and demonstrate adaptability in responding to disruptions;
- ✓ **Sustainability and environmental responsibility:** partners are encouraged to consider and adopt sustainable practices, minimize waste, and reduce their environmental impact.

Corporate social responsibility

We understand the importance of contributing to society and the environment beyond our business activities. Our approach to Corporate Social Responsibility (CSR) reflects our commitment to making a positive impact by supporting communities in need, non-governmental and non-profit organizations, and digital activists and promoting sustainability both in and outside the workplace.

Our pillars of corporate social responsibility include:

- ✓ **Environmental sustainability:** we are dedicated to mapping our environmental footprint and promoting sustainable practices. This includes reducing energy consumption in our operations, supporting green technologies, exploring ways to minimize our carbon emissions, and joining sustainability-focused organizations, such as UN Global Compact to help us on our journey towards sustainability;
- ✓ **Digital rights and cybersecurity advocacy:** as a company built on the principles of privacy and security, Surfshark advocates for the digital rights of individuals worldwide. We partner with various organizations to support initiatives that uphold digital freedom, privacy, and access to a secure internet;
- ✓ **Community engagement and support:** we believe in giving back to the communities we serve. Surfshark often donates and provides other means of support to NGOs and nonprofits that support digital rights, privacy and advocate for cybersecurity;
- ✓ **Employee involvement:** Surfshark encourages employees to participate in sustainability and volunteering projects that resonate with our values.

Conclusion & contact information

Our Code of Conduct reflects our commitment to integrity, accountability, and respect in every aspect of our business. By adhering to the principles outlined in this document, we aim to foster a culture that prioritizes ethical practices, supports our employees, and strengthens trust with our customers, partners, and stakeholders. Together, we can achieve our shared vision of a secure, inclusive, and sustainable digital future.



Contact Information

We encourage open communication and value feedback to continuously improve our practices. If you have any suggestions or need further clarification, please don't hesitate to reach out.

For employees' concerns: hr@surfsharkteam.com

For suppliers and other third-party providers: legal@surfshark.com

For nonprofits, NGOs, and activists: ngo@surfsharkpress.com

Final note

This Code of Conduct represents our collective responsibility to act with integrity and uphold the values that define Surfshark. By embracing these principles, we can continue to grow as a trusted, ethical, and forward-thinking organization.