



Code of Conduct





Nord Security's Code of Conduct

Purpose

With this Code of Conduct (the Code), Nord Security seeks to illustrate what it represents and believes in as a brand. We also set out our expectations for all parties that interact with Nord Security brand products, including NordVPN, NordPass, NordLocker, and NordLayer. Nord Security aims to operate in line with the highest standards of respectful and ethical business conduct.

We expect the management of Nord Security brand companies as well as their employees and contractors to act in line with the Code. We expect the values declared in the Code to be respected by our suppliers, partners, third parties providing services to Nord Security, and brands associated with Nord Security or acting on its behalf. Gross violations of the Code may amount to the discontinuation of the business relationship concerned.

Who we are

Nord Security is home to advanced security solutions that share Nord brand and values. We believe in the ideals of confidence, trust, sustainability, equality, and innovation. They reflect how we collaborate with our stakeholders, how we strive to be innovative with our technology, and how we work.

We believe that: Everyone should have safe and unrestricted access to the internet. Reaching global digital awareness through education is key to

freedom and growth. No business can be sustainable without being socially responsible and ethical.

We want: To make online security universally accessible — by spreading knowledge, sharing expertise, and creating intuitive security and privacy solutions anyone can use. We want to continue innovating and striving for greater security and privacy for everyone online.

We aim: To be synonymous with digital security. We strive to be among the most trusted privacy and security service providers in the world. We want to be known for our cutting-edge technologies, attention to users' needs, and strong core values.

Respect for privacy

We take data privacy very seriously. When providing our services, we aim to ensure, among other things, lawful and transparent data processing, data minimization, the use of a risk-based approach, and the implementation of proper security measures.

Data protection laws

We adhere to data privacy regulations. These include but are not limited to the guidelines set out in the EU General Data Protection Regulation (GDPR). Nord data processing activities are described in Privacy Policies which are publicly available on the websites of all Nord products.

Business ethics

Acting with integrity

We're proud to have a trusting relationship with our users, and we aim to continually demonstrate that we deserve that trust.

Working with partners

Nord Security does not tolerate any type of discrimination, hate speech, and other behaviors that could have a negative impact on a tech community. We expect our partners to behave in a respectful manner and always put integrity first when it comes to any type of communication with Nord Security or acting on its behalf. Gross violations of the Code may amount to the discontinuation of the business relationship concerned.

Competition

The Nord Security brand companies are committed to competing in a fair and vigorous manner, in compliance with all applicable antitrust practices and competition laws. We do not tolerate anticompetitive practices, including but not limited to sharing competitively sensitive information with competitors; entering into any prohibited agreements with competitors; or entering into agreements with suppliers or sales partners that impose anti-competitive exclusivity obligations.

Anti-corruption and anti-bribery

Nord Security is against any dishonest behavior by those in positions of power, be they managers or government officials. We do not offer or accept bribes, double-dealing, or under-the-table transactions.

Gifts, business hospitality, entertainment, and customer travel are only offered or accepted within the limits of local legislation and further guidelines and regulations established by Nord Security.

The receipt of high-value gifts shall be reported and documented. Anti-bribery and anti-corruption policies are in place and shall be duly followed.

Selecting and working with suppliers

Nord Security selects its suppliers based on fair and robust selection processes, taking into account quality and cost-effectiveness. We employ additional measures to ensure that we are not working with sanctioned or

otherwise restricted counterparties; convicted tax evaders; money launderers; or others involved in criminal activities, modern slavery, or unethical business practices. We will pay our suppliers, subcontractors, distributors, and agents in accordance with the agreed-upon terms. Every order must be documented by a written order or a written contract.

Advertising

Nord Security works to ensure that our advertising does not provide false or misleading information for our customers. We also expect our marketing partners, including influencers and affiliates, to follow the same standards.

User engagement

We recognize and value user feedback, whether it is a question, a problem, or a compliment, and give our full effort to improve according to it. We take pride in actively cooperating with our users and the cybersecurity community via such projects as the bug bounty program, focus group interviews, and user-expert surveys.

Workplace expectations

Diversity and inclusion

We are committed to a safe, healthy, and violence-free work environment. Behavior that poses a risk to the safety, health, or security of employees or visitors is prohibited.

Nord Security recognizes that inclusion and diversity mean valuing an individual regardless of their gender, marital or family status, sexual orientation, gender identity, age, disability status, ethnicity, religious beliefs, cultural background, country of origin, socio-economic background, perspective, or experience.

Respect

We treat others with respect and dignity at all times and through all forms of communication throughout Nord Security brand companies. We can disagree, but we should still seek common ground in our shared mission and appreciate that our differences can make us stronger. Remember, when someone has a different opinion, if you listen with an open mind, you may learn something new.

Equal opportunity employment

Nord Security is an equal opportunity employer that does not discriminate on any basis and strives to fully comply with local and international anti-discrimination laws and practices. Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, national origin, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law.

Corporate responsibility

Environmental responsibility

Where it is in our power to do so, we will avoid or mitigate harmful effects of our operations on the natural environment and resources. We are also constantly looking for ways to reduce our environmental impact in our daily office activities (e.g., through recycling and a paperless office as well as other zero-waste activities) and take active steps in measuring our environmental footprint.

Contributing to our communities

We support communities by donating to various nonprofit organizations that help protect human rights, fight racism, and promote inclusion and a safe digital world for all. As part of our community education program, we are participants of the world's leading events, where we continue to share our cybersecurity knowledge.

Protecting human rights

We stand for promoting equal opportunity in the digital age. We aim to see the internet the way it was first envisioned — free of crime, censorship, and surveillance. This vision is a fundamental part of our core values, and we honor this commitment in our policies and our actions.

Supporting free speech

Free speech is something that we often take for granted. It is also something that is widely debated and often controlled. In many parts of the world, free speech isn't a liberty people have. We provide privacy tools to communities and citizens to ensure the right to free speech in the digital era.

How to use the Code

If you, as a Nord Security employee, suspect the Code has been broken, you can raise your concerns with your direct manager, HR, or the risk department. You can also raise your concerns using the available forms, such as the incident report form for security issues, the Reporting Channel, or Compliance reporting forms for serious issues (the Incognito Mail can also be used if you prefer to stay anonymous).

Violations of the Code by Nord Security brand companies or their suppliers, partners, and third parties providing services to and brands associated with Nord Security or acting on its behalf can also be reported by any concerned third parties via email (conduct@nordsec.com).

All violations of the Code will be taken seriously and will be escalated with the relevant departments. Serious violations may result in a disciplinary action up to and including termination in line with applicable laws.

Conclusion

We aspire to be the leading brand in cybersecurity and strive to make the internet better than it is today. We trust that acting in line with the values outlined in this Code will ensure that Nord Security delivers its products and services in accordance with the best business practices.

We are committed to making sure that ethical standards are met. Even though it is impossible to think about every ethical issue that might arise, Nord Security still relies on good judgment to uphold a high standard of integrity and encourages all parties involved not to be silent but to speak up if something isn't right.



Contacts / Additional Information / Resources

For any questions related to the information provided in this Code, please contact conduct@nordsec.com