



SOPHOS DECLARATION TO RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT 7.0 (2021)

Sophos is committed to the principles embodied in the Responsible Business Alliance (RBA) Code of Conduct 7.0 (2021). Our commitment is key to the Company's business strategy, informs our decision making at all levels, and is core to the Company operating procedures. We expect these principles to be embraced by our vendors and suppliers, both in writing and in practice.

Specifically, the Sophos commitment extends to Labor, Health & Safety, Environmental, Ethical Business Practices, and Management Systems.

Labor. *Sophos upholds the human rights of all workers.* We strive to reflect dignity and respect in all circumstances, and we drive to understand all workers as part of the international community. This includes the acts, demeanor, words, evaluations, and consideration we exercise when present in the workplace and when engaged in the business community. Our commitment applies to all workers, including those of our vendors and suppliers.

Health & Safety. *Sophos embraces a safe and healthy workplace.* We believe that a productive workplace enhances the quality of our products and services, which creates a consistent and effective space that boosts retention and morale.

Environmental. *Sophos' environmental responsibility is integral to producing world class products.* Our commitment requires that adverse effects on the community, environment, and natural resources shall be reduced, if not removed.

Ethics. *Sophos shall uphold the highest standards of ethics and business practices.* The Company maintains a zero tolerance of all acts of bribery, corruption, extortion, and embezzlement. All business dealings are transparent and are properly reflected in the Company's books and records.

Management Systems. *Sophos operations ensures compliance with applicable laws and regulations.* This includes accountability, risk assessment, audit, training, records maintenance, and continuous improvement. Company policies governing anti-corruption, conflict minerals, whistleblowing, and modern slavery are in place, practiced, and audited by the Company, its Board, and third parties.

For more detail about the Company's RBA commitment, contact Compliance@Sophos.com.

Kris Hagerman

Kris Hagerman

Kris Hagerman (Feb 19, 2021 13:13 PST)

Chief Executive Officer

Date: Feb 19, 2021