

Supply Chain Code of Conduct

Introduction.

Check Point is a worldwide leader in developing and providing cyber security solutions to governments and corporate enterprises globally. Check Point assures the high standards of its supply chain conduct by ensuring that the working conditions in Check Point's operations and supply chain are safe and that business operations are conducted ethically. We require our suppliers of products and services ("**Suppliers**") to comply with our high standards and values.

Throughout this Code, Check Point promotes the following core principles:

- Honest and Ethical Conduct
- Integrity
- Open Communication
- Equal Opportunity and Diversity

Purpose. Check Point strives to promote this common set of values and establish uniformity within the entire company and its business environment. This Code demonstrates our commitment to act responsibly and in accordance with all relevant laws and regulations.

Scope. This Code applies to all Check Point's Suppliers, their personnel, sub-contractors and third parties they engage with.

Compliance with this Code and Applicable Laws and Regulations

Check Point fully complies with the standards and regulations that apply to it and to its supply chain, as listed in Annex A of this Code.

Our Suppliers must comply with applicable laws and regulations. We expect our suppliers to respect and adhere to the domestic laws in their countries of residence and of the countries where they conduct business, in different areas and sectors, such as: international and local regulations and controls of exports and imports; international accessibility standards; and anti-corruption and anti-money laundering practices.

Our Suppliers are also required to comply with Check Point's policies, to self-monitor their compliance and to declare that they meet our standards and applicable laws, including confirmation that they do not engage in involuntary labor, slavery or human trafficking and do not have a conflict of interests.

Check Point reserves the right to audit and monitor the Supplier's compliance with this Code and with the applicable laws and regulations. A supplier that is not in compliance bears the risk of termination of the business relationship with Check Point.

Ethics

Business Integrity: Anti-Bribery; Anti-Corruption and Anti-money Laundering

- (a) Our Suppliers are required to comply with the highest standards of ethics, including: honesty, integrity, transparency and open communication.
- (b) We expect our Suppliers to maintain accurate books and records, and to ensure compliance with anti-corruption, anti-money laundering and all bribery laws and regulations, as well as with all of Check Point's relevant policies, including Check Point's Code of Ethics and Business Conduct and Check Point's Anti-Corruption and Anti-Bribery Policy.
- (c) We expect our Suppliers to have a zero-tolerance policy for improper payments, and to prohibit any and all forms of corruption, bribery and money laundering. In this regard, our Suppliers are required to comply with the following restrictions:
 - Corruption of government officials in any form.
 - Payments of bribes of any kind (whether in dealings with public officials or private individuals).
 - Any business related payment by or to Check Point personnel, which was not authorized in advance by Check Point.
 - Any undisclosed commissions (or a commission in excess) to a third party for obtaining any business.
- (d) Our suppliers are required to promptly report to Check Point any conduct they believe is corrupt.

No Harassment and Discrimination

Check Point prohibits any form of harassment and abusive behavior and in particular sexual harassment. Sexual harassment may include applying force of a sexual nature, unwelcome sexual advances, requests for sexual favors, inappropriate promise of rewards in exchange of sexual favors, and other verbal or physical harassment of sexual nature. We take allegations of harassment and abusive behavior very seriously and take severe actions against anyone harassing another in the workplace.

In addition, Check Point prohibits discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, religion, disability, pregnancy, union membership, political affiliation, covered veteran status, protected genetic information or marital status in hiring and employment practices.

Fair Business, Advertisement and Competition

Our Suppliers are required to comply with all applicable fair business, advertisement and competition laws and regulations. Specifically, Our Suppliers shall avoid any conduct that may harm the competition and fair trading.

Conflict of Interest

Our Suppliers are required to perform the services for the sole benefit of Check Point and not to take into account any consideration which may lead to any conflict of interest or impropriety between the Supplier, a third party and Check Point. Our suppliers are expected to disclose any potential conflict of interest that may occur, such as having family or friendly associations with any of Check Point's employees.

Responsible Sourcing of Minerals

Our Suppliers are required to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, and corresponding regulations regarding conflict minerals (such as - Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act).

Our Suppliers are also required to provide us with reports and declarations on the sourcing of materials and their compliance with the laws and regulations.

In addition, we expect our Suppliers to require from their sub-suppliers not to use conflict minerals from affected areas and comply with the "minerals conflict free" requirement".

Export and Import Laws and Regulations

Our Suppliers are required to comply with the applicable export and import laws and regulations or any applicable regulations on international trade.

Insider Trading

Our Suppliers are required to comply with all laws and regulations regarding the trade of securities. Suppliers that have access to non-public information regarding Check Point are not permitted to use or share that information for purposes of trading securities of Check Point. It is unethical and illegal to use non-public information for financial benefit or to "tip" others who may make an investment decision on the basis of this information.

Labor

- (a) Our Supplier are required to treat their employees with dignity and respect.
- (b) Our Suppliers are required to give their employees equal opportunities and to strive for diversity.
- (c) Our Suppliers are required to provide a safe and healthy workplace for their employees and to ensure that all employees are properly trained and aware of any risks that may arise.
- (d) Our Supplier are required to ensure and monitor the compliance with labor laws and regulations as well as with Check Point's Human Rights and Labor Policy, including with the following labor standards:
- (e) Our Suppliers shall not use or permit any form of forced or involuntary labor, slavery, or human trafficking. All employees shall be free to resign from their employment in accordance with local laws and regulations without unlawful penalty.
 - Our Suppliers shall not employ any person (child) under the minimum permitted age of employment.
 - Our Suppliers shall comply with the working hours and rest days required by local law.
 - Our Suppliers shall comply with laws and regulations regarding minimum wage and mandatory benefits.
 - Our Suppliers shall ensure the health and safety of their employees in the workplace.
 - Our Suppliers are required to have defined processes for raising concerns without the fear of retaliation.
 - Our Suppliers are committed not to hold in their possession any "deposits" of employees such as their identification papers, immigration papers, passports, driving licenses etc., or destroying, concealing or otherwise restricting the employee's access to such documents.
 - Our Suppliers are required to respect the legal rights of their employees to join labor organizations and trade unions.
 - Our Suppliers shall strive to employ permanent full time employees and refrain from employing part time and temporary employees as much as possible.
 - Suppliers will ensure that their suppliers are bound by the same or similar values, standards and undertakings as specified in this Code.
 - We care about our Suppliers and value our relationships with them. For this reason, Check Point offers better payment terms for small suppliers as needed and in accordance with company's guidelines.

Environmental

Our Suppliers are required to comply with the applicable laws and regulations in the field of environment sustainability field. This includes working with environmentally conscious components, the efficient use of standards and supporting waste reduction strategies, minimizing the negative impact on climate change and the compliance with Check Point's Environmental Policy.

Our Suppliers shall also obtain and maintain all environmental permits, approvals, licenses and registrations required by the applicable laws and regulations.

Intellectual Property, Confidentiality and Privacy

Proprietary Information

- (a) Our Suppliers are required to respect any proprietary rights to which they or their personnel or representatives may have access to, and shall never use such proprietary rights outside the scope of the services rendered to Check Point.
- (b) Our Suppliers shall comply with all intellectual property rights of Check Point and others, including, but not limited to, copyrights, patents, trademarks and trade secrets.
- (c) Our Suppliers are required to manage the use of information and know-hows in a manner that protects intellectual property rights.
- (d) Our Suppliers shall acknowledge that the ownership of any proprietary right that relates to or results from the services rendered by them to Check Point shall be the exclusive property of the Company.

Confidentiality

Suppliers that may have access to certain non-public proprietary, confidential or competitively sensitive information of Check Point, shall treat the information in accordance with the following standards:

- Not disclose Check Point's confidential information to any third parties;
- Not use any of Check Point's confidential information for any purposes except to carry out the services;
- Maintain the confidential information in strict confidence; and
- Take all required measures to protect the secrecy of the confidential information.

Privacy

Our Suppliers are required to comply with all applicable laws and regulations regarding privacy, data protection and information security, including complying with standards regarding the collection, storage, processing, transmission and disclosure of data.

Business Practices, Management and Control

- (a) Our Suppliers are required to implement the values of this code and ensure implementation and awareness among their employees.
- (b) Our Suppliers are required to update Check Point on any possible violation of the requirements set forth herein.
- (c) Our Suppliers are required to record and report all business information in a complete and accurate manner, as required by applicable laws and regulations.
- (d) Our Suppliers shall not speak to the press or to any other agency for public relations on behalf of Check Point, unless they were explicitly authorized to do so, in writing, by Check Point's officials.
- (e) Our Suppliers are required to establish and maintain a management and control procedures to ensure the compliance with all applicable laws, regulations and requirements set in this Code, and in order to identify and mitigate operational risks related to this Code. Our Suppliers shall also ensure the confidentiality, anonymity and protection of individuals with respect to whistleblowers' programs and to ensure that their personnel is able to raise any concerns without the fear of retaliation. The Supplier's management procedures shall include:
 - Adopting policies and statements confirming the Supplier's compliance with laws and regulations;
 - Identifying senior executives that are responsible for the implementation and compliance, risk assessment and management;
 - Training of employees;
 - Having improvement objectives and implementation systems; and
 - Conducting audits.
- (f) As required and at Check Point's sole discretion, Check Point will be entitled to evaluate the Supplier's compliance with this Code.
- (g) Check Point is entitled to update and/or change the guidelines of this Code from time to time.

Contact Information for Reporting and Raising Concerns

For proper disclosure, reporting and consulting on any questions regarding the Supply Chain Code of Conduct please contact us at: ethics@checkpoint.com.

You may also contact our General Counsel at Jslavitt@checkpoint.com and/or by phone: +1 650 628 2110.

Check Point will keep the confidentiality, and will protect and support, to the extent possible, any individual who reported the violation of the laws, regulations and Check Point's standards, in good faith or sought out for advice.

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