

Anti-Corruption, Bribery and Money Laundering Policy

Introduction

Purpose. Check Point is a worldwide leader of cyber security solutions for governments and corporate enterprises globally. Our goodwill and reputation are affected by what we do every day. By putting our commitment in writing we clearly set out the business practices that we follow and set clear standards of behavior for everyone associated with our organization. Our culture and values help us build trust with our customers, business partners, investors, other organizations and governments, and trust and integrity is the core of our business and operations.

We have zero tolerance for bribery, corruption and money laundering in any form. Corruption, bribes and money laundering may harm the trust we build with our business environment and customers. We rather lose business in the short term than take risks with potential illegal actions that will harm the trust we have built with our customers and partners and our reputation due to improper benefits.

Scope. This Policy applies to all Check Point employees, officers, directors and business partners and affiliates of the company, including but not limited to, agents, consultants, representatives, resellers, subcontractors, lawyers, accountants and other intermediaries, acting on Check Point's behalf.

Our Principles

Bribery. Any offer, payment or anything of value that is given or promised, directly or indirectly, to any person, in order to influence an act or a decision, or to obtain, retain or secure improper advantage in the conduct of our business, is prohibited.

Instances of bribery may include (but not limited to): transactions by, or in relation to subsidiaries, joint ventures, agents, representatives, consultants, brokers, contractors, suppliers, employees and other affiliates and business partners with government official, family members and close associates of a government official, a political candidate, party official, any private sector employee, a person who directs or works for a private sector enterprise in any capacity, or any third party.

Facilitating Payments. Unofficial, improper, small payments made to a low level Government Official for the purpose of securing or expediting the performance of a routine or necessary non-discretionary governmental action, are prohibited.

Charitable Donations and Contributions. The use of charitable donations and sponsorships as a subterfuge for bribery, is prohibited.

In addition, any direct or indirect contributions to political parties, party officials, candidates, organizations or individuals engaged in politics as a subterfuge for bribery, is prohibited.

All of the charitable donations, sponsorships and contributions we make are disclosed as we encourage honesty and transparency.

Gifts, Hospitality, Travel and Expenses. Any offer, give or receive of anything of value to or from customers, vendors, consultants or other business partners or third parties, that is not considered as a reasonable and bona fide expenditure, in such a value that may affect the outcome of a procurement or other business transaction, is prohibited.

Examples include:

- Personal benefits (gifts such as money, goods or services)
- Free services, discounts, loans
- Lavish entertainment or other special favors
- Hospitality or travel expanses

Money Laundering. Money laundering is strictly prohibited in any of its forms. No person or entity acting on Check Point's behalf shall use its relationship with Check Point in order to disguise or attempt to disguise the sources of illegally obtained funds.

Conflict of Interest. Conflict of interest situations may occur when private interests interfere or conflict with Check Point's interests. While there are some potential conflict of interest situations that may promote the business of the company, they require proper disclosure and will be decided upon on a case by case basis. The decision maker will in no way be the person involved in the conflict of interest situation.

Our employees are required to properly disclose to the VP of Human Resources and/or the General Counsel any circumstances and report all facts relating to relationships or financial interests that may give rise to conflicts of interest. Directors and members of senior management should make similar reports to Check Point's Audit Committee and the Board of Directors through the General Counsel.

Government Officials. Includes, but not limited to, any officer or employee of a government department, agency, or instrumentality thereof or of a public international organization, state owned enterprise or state controlled entities; a political candidate, party or any officer or employee of a political party; or any person acting as an official for or on behalf of such person.

Our Commitments

Compliance. Check Point complies with all applicable laws and regulations. The standards set in this Policy do not supersede any provision of local law and regulation. In the unlikely case of a conflict between these set of standards and applicable law, our employees are required to act in line with the applicable laws and regulations.

Check Point fully complies with the US Foreign Corrupt Practices Act (the "**FCPA**"), the UK Bribery Act, the anti-corruption provisions of Israel's Penal Law and other local and national anti-corruption, anti-bribery and anti-money laundering laws and regulations, as applicable. Our suppliers, business partners and affiliates are also required to fully comply with our standards and we prohibit receiving or offering a bribe on behalf of

Check Point as well as disguising or attempting to disguise sources of illegally obtained funds. Our business partners hold a reputation for integrity.

Ethics and Transparency. We encourage honesty and transparency and we respond truthfully and appropriately to government requirements and requests for information disclosure.

We expect employees to conduct themselves in a respectful, honest and ethical manner and with full integrity. We are transparent about our commitments and our agreements reflect all terms and conditions of the transactions we make.

Financial Reporting and Record Keeping. Our CEO, CFO and finance department employees are obligated to provide information that is accurate, complete, objective, relevant and understandable. Specifically, they are obligated to ensure that:

- All financial transactions are identified and properly and fairly recorded in the appropriate books and records.
- There are no “off the books” or secret accounts, and no documents, which do not fairly and accurately record the transactions.
- All business expenses are documented accurately and made subject to the necessary authorization. There are no recording of non-existent expanses or liabilities.
- Payments are monitored in order to avoid the usage of payments as substitutes for bribes.

In addition, we use internal controls and audits in order to make sure that our books and records, and all other public disclosures and information are accurate and timely. Our employees are also required to adhere to our disclosure controls and procedures, which include, without limitation, controls and procedures designed to ensure that information required to be disclosed by the Company in the reports that it files and in the public statements that we make, are accumulated and communicated to the Company’s management, including the Chief Executive Officer and Chief Financial Officer, as appropriate, to allow timely decisions regarding required disclosure.

Any form of altering, destroying, mutilating or concealing a record, document, or other object, or attempting to do so, with the intent to impair the object’s integrity or availability for use in an official proceeding is prohibited.

Oversight and Enforcement

Oversight. Our senior management is responsible for overseeing the compliance with the standards and principles set in this Policy. Our senior management reviews periodically the Policy’s suitability, adequacy and effectiveness, and is responsible to implement improvements as appropriate.

Risk Assessment. Our General Counsel, who acts as our compliance officer, is responsible for taking measures in order to identify, assess, define and address any risks of the company, that may arise within the company or by its affiliates and business partners.

Due Diligence. We are committed to conducting a risk based due diligence and regular oversight of our business partners, in order to ensure compliance with the applicable laws and regulations and the company’s standards and policies.

Remediation. We take actions in order to decrease any identified risks and we remediate misconduct.

Reporting. Any employee or any third party that becomes aware of any illegal or unethical conduct, or possible violation of this Policy, shall report all relevant information to the General Counsel. Alternatively, our employees may also:

- Consult with our VP of Human Resources and/or the General Counsel if they are unsure about the best course of action in a particular situation.
- Use Check Point's "open door" policy to raise the matter to higher levels of management, including ultimately to the Chief Executive Officer and the Board. Our managers are empowered together with the professional teams to address concerns of ethics and business conduct, and should listen to concerns raised and take them seriously.

Senior financial officers and directors should report any known or suspected violation of this Policy by any senior financial officer to the Board or the Audit Committee of the Board.

Where permitted by law, reports may be made confidentiality and anonymously.

Training. Our employees and new hires are required to review, understand, certify and comply with our policies and standards, including this Policy. New hires and employees with certain roles and responsibilities are required to complete our training program, which includes the content of this Policy and of other company policies. Our training activities are assessed periodically, in order to ensure their effectiveness.

No Retaliation. We prohibit any and all forms of retaliation, or discriminatory or disciplinary action, against anyone who: (a) provides any information in good faith or reports any such corrupt conduct and/or activity; or (b) makes a good faith and appropriate complaint regarding violation of this Code; (c) assists in any investigation.

Any employee who believes that he or she has been the subject of any retaliation is strongly encouraged to immediately report it to the VP of Human Resources and/or the General Counsel directly. Any claims will be confidential and conducted with a full and fair investigation.

Disciplinary Measures. Any violation of these standards and principles may result in disciplinary action and the termination of employment. Check Point may impose sanctions including dismissal, report to the relevant authorities, etc. for violations of this Policy as appropriate under the circumstances.

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