

## Bright Data Code of Ethics and Conduct

### **1. Purpose and scope**

This Code of Ethics and Conduct ("**Code**") contains general guidelines for conducting the business of Bright Data Ltd. (the "**Company**", "**We**", "**Our**") consistent with our policies and the highest standards of business ethics.

We expect all persons covered by this Code – our employees and contractors as well as our service providers, vendors, suppliers and other business contacts or partners (together the "**Company Partners**" or "**Partners**") – to adhere to these standards. When necessary, the present Code will specify if, to who and how a specific provision is applicable.

If you have any questions about these guidelines, please contact Mor Avisar at [mora@brightdata.com](mailto:mora@brightdata.com). This Code provides preliminary and general information and does not address all the possible issues relating to the Company. We encourage you to take this opportunity to review our detailed policies and to discuss any questions you may have with your supervisor or your direct point of contact within the Company. The guidelines set out in this Code are to be followed both internally, at all levels of the Company by our directors, officers and employees, and externally as a pre-requisite for Company's business day-to-day operations with its Company partners.

### **2. Corporate values**

We are dedicated to conduct and operate all our business operations in accordance with the highest standards of ethics.

We are obligated to our employees, shareholders, customers, suppliers, and other business contacts to be

- **Respectful and Responsible**

We believe in the strength of diversity, the benefit of difference and obliged ourselves to respect every individual in our common working environment, irrespective of gender, nationality, ethnicity, sexual orientation and beliefs. We strongly believe that quality and efficiency are reached through cooperation and dialogue which can't exist without respect.

- **Ambitious, transparent and fair**

As we aimed to disrupt the sector we are operating in, we are always looking for innovative solutions to confront the various challenges we face. Our ambition is driven by a positive corporate state of mind with a focus on transparency and fairness to allow problems to be approached in an open and factual manner, by accepting different opinions and objectively seeking the best solution for the development of the Company. While seeking to conquer our business sector we also believe in fair competition in the market and oppose any behavior tending to restrict competition in any form whatsoever.

Accordingly, throughout operational and commercial activities led by the Company, or alongside the Company, by Company Partners, we strongly believe that upholding the Company's higher standards of business ethics and promoting our fundamental values is essential to achieve the above-mentioned objectives.

### **3. Ethics in the Workplace Environment**

#### Harassment and discrimination

We are committed to providing our Company Partners with a professional work environment, free from discrimination and harassment. It is expected that all Company Partners, regardless of their position, will treat colleagues and other persons they are in interaction with, both with respect and consideration at all times. The Company prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual.

#### Health and safety

The Company intends to provide a healthy and safe work environment for all of its employees and Partners. We expect from all Company employees and Partners to carry out their work, duties and assignments in a safe manner, without causing harm to themselves or others, and to report any potentially unsafe or unhealthy situations immediately.

#### Confidential information

Confidential information, especially information relating to technology, services, products, prices, developments, innovations and know-how, is of great value. We regard all business-related information as confidential and do not share it without formal authorization. We expect our employees and Company Partners to respect the confidential nature of the information entrusted to them during the course of their work, duties and assignments. Confidential information must be protected against any unauthorized access and handled in accordance with the laws and regulations of the countries in which we operate.

#### Protection of Company's resources

Employees and Company Partners (to the extent applicable to their role), must treat the Company's property and resources with the greatest care and consideration. Such resources include, for example, all intellectual property (know-how, software, patents, brands, etc.), equipment, workplace facilities and tools, the Company's financial resources and any other information of whatever type (technical, commercial, financial, social or otherwise). These must not be used in an incorrect or unauthorized manner or diverted for non-business purposes.

#### **4. Compliance with Laws and Regulations**

The Company takes its responsibilities of complying with the law very seriously. All Company Partners are obligated to comply with any laws, rules and regulations applicable to the Company and its operations. Specifically, Company Partners are expected to understand and comply with all laws, rules and regulations that apply to their job positions, their personal assignments or specific missions.

##### Anti-Corruption and Anti-Bribery

It is the Company's strict [policy](#) that it conducts its business free of corruption and other impropriety. The Company and its Partners acknowledge that they are subject to anti-bribery, anti-corruption and anti-money-laundering laws in the various jurisdictions in which they operate.

Accordingly, it is strictly prohibited to pay or offer, directly or indirectly, money, material benefits or any other advantages of any kind to third parties, whether representatives of governments, other public officers and public servants, or private employees and entities, in order to influence or remunerate the actions of their office or otherwise receive unfair and illegal business for the Company or during the course of a business relationship with the Company.

##### Interactions with Government Officials

We are committed to the highest legal and ethical standards in all of our business activities, wherever they may be. Under no circumstances may Company Partners offer or provide, with the Company's support, anything of value which is intended to influence an official act or decision of a government official; this includes any payments or provision of anything of value both directly or indirectly to governmental officials.

##### Anti-money laundering

Whilst money laundering has slightly different meanings throughout the world, generally it refers to the process of transforming profits of crime and corruption into apparently "legitimate" assets (e.g. of a company). Given the broad range of what may be considered to be money laundering across the jurisdictions in which the Company operates, Company Partners are strongly encouraged to discuss with the Financial Department or Legal Department if there is any concern whatsoever that such activities could have, or have, taken place.

##### Insider trading

Unauthorized use of the Company's intellectual property and information could not only be a violation of the Code but in certain instances, it may be used for insider trading, which is a violation of the law. It is strictly prohibited to use any non-public information relating to Company's business or customers to buy or sell stock or to pass it onto third parties so that they may do so.

##### Data protection

We take the protection of personal data and privacy very seriously. All Company Partners who have access to personal data of any data subject, including other Company's employees, clients, suppliers or any other individual are responsible for strictly complying with any applicable legislations, regulations and guidelines, and are expected to adhere to all internal procedures and processes

developed to ensure that personal data and privacy is protected in as much as possible and within the limits of the law. For any further details regarding the company's policy regarding the protection of personal data, please consult the various notices implemented to legally frame our company's daily relationship with processing operation of personal data (i.e. our privacy policy).

### Environment

We, as expected from a modern company aware of the preoccupation of our era, seek to increase the implementation of responsible and good practices with respect to problems affecting the environment. We encourage and promote initiatives in this direction while working on environmentally friendly directives and technologies.

### Forced Labor and Child Labor

We are committed to preventing modern slavery and human trafficking in all aspects of our business. Company Partners must not participate in or benefit from any form of forced labor, including bonded labor, forced prison labor, slavery, involuntary servitude, or human trafficking. Company Partners involved in our engagements must have the freedom of movement during the course of their employment. Company Partners must not engage in or benefit from the use of child labor. Child labor is defined as employing persons below the minimum age for employment in accordance with applicable laws.

## **5. Disclosing Conflicts of Interests**

We require all Company Partners to disclose any situations that reasonably would be expected to give rise to a conflict of interests. If you suspect that you have a conflict of interests, or something that others could reasonably perceive as a conflict of interests, you must report it to your supervisor, or to your direct point of contact within the Company, who will work with you to determine whether you have a conflict of interests and, if so, how best to address it.

Although conflict of interests are not automatically prohibited, they are not desirable and may ultimately be waived by an executive officer of the Company (following a discussion with the legal department). Remember, having a conflict of interests is not necessarily a Code violation, but failing to disclose it, is.

## **6. Violations and Sanctions**

### Reporting violations

All Company Partners have a duty to report any known or suspected violation of this Code, including any violation of the laws, regulations or policies that apply to the Company. If you know of, or otherwise suspect, a violation of this Code, you shall immediately report to your supervisor or to your direct point of contact within the Company. In case you do not feel comfortable reporting the conduct to your supervisor, or to your direct point of contact within the Company, or if you do not get a satisfactory response, you may directly contact the legal department at [mora@brightdata.com](mailto:mora@brightdata.com).

All reports of known or suspected violations will be handled sensitively and with discretion. The Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern.

The Company prohibits retaliation against any Partner who, in good faith, seeks help or reports known or suspected violations. Any such reprisal will be subject to disciplinary action, including potential termination of employment.

Failure to comply

a) Employees

Your conduct as an employee or as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company. It is Company policy that any employee who violates this Code will be subject to appropriate disciplinary action, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation.

An employee accused of violating this Code will first be given an opportunity to present his or her version of the events at issue prior to any determination of appropriate discipline. In addition to disciplinary measures, employees who violate the law or this Code may also expose themselves to civil damages, criminal fines and prison terms.

b) Company partners

Violation of elements of this Code by Company Partner (other than employees) may call into review the contract and working relationship of such a Partner.

If such a violation is deemed by the Company so severe, unethical or otherwise illegal, the Company may decide to end the working relationship, call for any specific actions to remediate the situation, or ultimately defend its rights and interests in Courts.

Summary

**It is the responsibility of every Company Partner to comply with the spirit and principles of this Code, as amended from time to time.**

**To the extent that this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, we as a Company adhere to these higher standards as outlined in this code.**

**Please note that this Code is not a contract of employment nor a guarantee of continuing Company policy and we expressly reserve the right to amend, supplement or discontinue this Code at any time.**