



SOPHOS DECLARATION TO RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT 8.0 (2025)

Sophos is committed to the principles embodied in the Responsible Business Alliance (RBA) Code of Conduct 8.0 (2025). This is a key commitment to the Company's business strategy, which informs our decision making at all levels and is core to the Company operating procedures. Oversight is provided via the Sophos ESG Policy, which includes a report to the Sophos Board at least once a year, along with an annual ESG report. We expect these principles to be embraced by our suppliers 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. Sophos Human Resources ensures appropriate provisions are in place when using third-party suppliers, including provisions to prevent forced labor.

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.

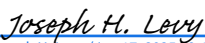
Ethics. ***Sophos shall uphold the highest standards of ethics and business practices.*** The Company maintains a zero tolerance of all acts of bribery, corruption, extortion, and embezzlement. All business dealings are transparent and are properly reflected in the Company's books and records.

An Employee Handbook reflects Sophos' Code of Conduct, including whistleblowing, confidentiality, and non-retaliation. This Handbook is reviewed and accepted by all employees annually.

Management Systems. ***Sophos operations ensure 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.

Joseph H. Levy


Joseph H. Levy (Jan 17, 2025 08:45 MST)

Chief Executive Officer

Jan 17, 2025

Date: