

Anti-Bribery and Anti-Corruption:

Arctic Wolf Networks, Inc. ("Arctic Wolf"), a global leader in cybersecurity, is dedicated to its mission to "End Cyber Risk". As the company works relentlessly toward this goal for our customers, we are equally committed to conducting business responsibly, ethically, and in compliance with all applicable laws. Accordingly, Arctic Wolf expects all directors, officers, and employees, regardless of role or location, to conduct business ethically in accordance with applicable anti-bribery and anti-corruption laws. Arctic Wolf has zero tolerance for bribery and corruption, provides annual mandatory anti-corruption / anti-bribery training to its personnel, and enforces this policy across all of its organizations, including its subsidiaries, which can involve suspension or termination of employment for any violations. Personnel are required to immediately report any suspected or actual activity of corrupt behavior to any manager of the company or to the Chief Compliance Officer at: compliance@arcticwolf.com, or anonymously through the Arctic Wolf Hotline at 800-461-9330 or the [AWN Code of Conduct and Compliance Portal \(www.arcticwolf.com/report\)](http://www.arcticwolf.com/report). Arctic Wolf does not retaliate or tolerate retaliation against anyone filing a report in good faith.