

Code of Conduct and Ethics

Arctic Wolf Networks, Inc. and its subsidiaries and affiliates worldwide (“Arctic Wolf” or the “Company”) understand that its customers and business partners trust Arctic Wolf not only because it produces cybersecurity solutions, but also because Arctic Wolf holds itself and its directors, employees, and service providers to the highest standards of honesty, integrity and professionalism while conducting business. The following policy statements (this “Code”) set forth the ethical business principles that the Company strives to achieve in all of its business dealings. Every Arctic Wolf director, officer, employee, as well as each freelancer, individual employed by carriers/professional employer organizations/agencies or other contingent worker acting on behalf of Arctic Wolf (each an “Arctic Wolf Service Provider”) is accountable for ensuring that Arctic Wolf’s values are reflected in the work performed and Arctic Wolf’s team culture. As such, Arctic Wolf expects all Arctic Wolf Service Providers to follow this Code and to foster a well-organized, respectful, and collaborative environment.

All revisions, and any exceptions, to the provisions of the Code, require approval and written authorization by the Company’s Board of Directors and the Chief People Officer.

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Scope

This Code applies to all individuals who are employed by Arctic Wolf or otherwise responsible for managing the business, regardless of position or level of authority, including all Arctic Wolf Service Providers and Arctic Wolf business partners. As used throughout this Code, the terms “employee” and “employees” should be interpreted as referring to all such individuals. All employees are required to follow this Code at all times while performing their duties on behalf of Arctic Wolf, traveling on Arctic Wolf business, attending Arctic Wolf events or while representing Arctic Wolf in any other manner. If a provision of this Code

conflicts with the language in any term of a written agreement between an employee and Arctic Wolf, the employee's agreement will govern only as to the specific conflicting language, and the employee must comply with this Code in all other respects.

Arctic Wolf conducts business on a global basis. Arctic Wolf appreciates and respects the diversity of cultures throughout the world and strives to conduct business in a culturally appropriate manner. Employees of Arctic Wolf are expected to comply with the Company's policies, the ethical standards, and legal requirements of each country in which Arctic Wolf does business, as well as United States laws that apply in other countries. Every employee is responsible for conducting business in a non-discriminatory manner free from harassment. All employees should be respectful of their colleagues. Arctic Wolf will not tolerate any kind of discriminatory behavior, harassment or retaliation.

Employees who violate the standards in this Code may be subject to disciplinary action. Depending on the nature of the violation and the history of the employee, such disciplinary action may range from a warning or reprimand to termination of employment as permissible to the full extent under applicable law. In appropriate cases, civil legal action or referral for criminal prosecution may result.

While this Code covers a wide range of business conduct, it is not the only document that addresses the conduct of Arctic Wolf employees, officers, and directors, and other Arctic Wolf Service Providers. For instance, this Code references a separate and more detailed policy relating to Insider Trading. Furthermore, Arctic Wolf's Employee Handbook and other applicable local work rules and policies, include policies and provisions relating to, among other things, anti-harassment and anti-discrimination. Finally, Arctic Wolf employees are subject to additional invention assignment and confidentiality agreements that they entered into with the Company, including but not limited to the terms of the Proprietary Information and Inventions Assignment Agreement ("PIIA") for employees in the United States. If you have any questions about whether your behavior or any behavior you observe is appropriate, it is your responsibility to ask your supervisor.

Honest and Ethical Conduct [🔗](#)

Arctic Wolf's core values of Security, People, Innovation and Transparency are fundamental to who we are and how we operate as a company. Accordingly, it is our policy to promote high standards of integrity by conducting our affairs in an honest and ethical manner. Arctic Wolf's integrity and reputation depend on the honesty, fairness, and integrity brought to the job by each person associated with us. Unyielding personal integrity and sound judgment is the foundation of corporate integrity.

Protection of Company Property [🔗](#)

All employees should treat Arctic Wolf's company property, whether material or intangible, with respect and care. Employees should not misuse company equipment or use it without proper business rationale. They should treat all corporate property (physical and intellectual) with respect and confidentiality. Employees should protect company facilities and other material property (e.g. laptops) from damage and vandalism, whenever possible.

Arctic Wolf provides electronic systems and communication services, including e-mail, voicemail, instant messaging, Internet, computers and other devices, and other electronic and communication systems (collectively, "Systems") for the purpose of conducting Arctic Wolf business. Access to Arctic Wolf's Systems is a privilege that is provided provide by Arctic Wolf and granted based on job responsibility. By using Arctic Wolf's Systems, employees are agreeing to accept and abide by the terms of this Code. All employees must take care to ensure that Internet access and other use of the Arctic Wolf Systems does not violate this or any other Arctic Wolf policy, including but not limited to the Acceptable Use Policy.

Only employees and others expressly authorized by Arctic Wolf may use or access Arctic Wolf's Systems. Nothing herein is intended to prohibit an employee's rights under any applicable laws. Additionally, Arctic Wolf will not construe or apply this Code in a manner that prevents employees from communicating with each other about the terms and conditions of their employment.

All Arctic Wolf Systems, material or data created or stored on such Systems, e-mail addresses assigned to employees, and all communications transmitted through or using these Systems are the property of and belong, or their use is otherwise controlled by or at the discretion of, Arctic Wolf. Consistent with applicable laws, Arctic Wolf and others it may authorize (including governmental or law enforcement authorities) have the right to access, monitor, use or disclose any data, files and communications created, transmitted or stored on its Systems, as well as any and all information regarding the use of these

systems (including Internet browsing history and sites accessed) and all messages created, sent, stored or retrieved through Arctic Wolf's Systems. Please review the applicable privacy notices and IT notices for specific requirements applicable to employees in the jurisdictions where Arctic Wolf operates.

Protecting AWN's Confidential Information [↗](#)

In the course of business, employees have access to confidential or proprietary information about Arctic Wolf, its customers, prospective customers, suppliers or other third parties with which Arctic Wolf does business. In addition, each employee has either signed and entered into a PIIA with Arctic Wolf or has included in their employment agreement with Arctic Wolf or a Service Provider terms substantially similar to those in the PIIA (the "Confidentiality Terms"). The PIIA and Confidentiality Terms require each employee and service provider to hold in confidence and not disclose or, except within the scope of their employment or service, use any Arctic Wolf confidential or proprietary information, including any and all inventions (whether or not patentable), works of authorship, designs, know-how, ideas and information made or conceived or reduced to practice, in whole or in part, by Arctic Wolf employees or service providers. Employees must abide by all of the terms and conditions of the PIIA and the Confidentiality Terms, as applicable.

This Code does not prohibit employees from disclosing their wages, nor will Arctic Wolf take adverse employment action against an employee for disclosing their own wages or discussing another employee's voluntarily disclosed wages. However, nothing in this Code or the Employee Handbook shall be construed to create an obligation on Arctic Wolf or any employee to disclose wages, nor does this section permit an employee, without the written consent of Arctic Wolf, to disclose confidential information or information that is otherwise subject to a legal privilege or protected by law, or permit an employee to disclose wage information of other employees to a competitor of Arctic Wolf. Furthermore, where permitted under applicable federal, state, or local law, Arctic Wolf prohibits HR Team employees, supervisors, or other employees whose job responsibilities require or allow access to other employees' wage or salary information from disclosing that information without prior written consent from the employee whose information is sought or requested. An employee also has statutory rights under certain states' laws in the United States related to prohibitions on wage disclosure and remedies for violations of such rights.

This Code, including the provisions addressing confidentiality obligations, is not intended to and/or shall not limit, prevent, impede or interfere in any way with employees' and service providers' right, without prior notice to the Company, to provide information to the government, participate in investigations, testify in proceedings regarding the Company's past or future conduct, or engage in any activities protected under whistleblower statutes. Nothing herein is intended to preclude or dissuade employees and service providers from engaging in activities protected by applicable law, including the United States National Labor Relations Act, such as discussing wages, benefits, or terms and conditions of employment, including discussions regarding forming, joining or supporting labor unions, raising complaints about working conditions for fellow employees' mutual aid or protection or other legally protected activities under applicable law. Nothing in this Code prevents employees or service providers from discussing or disclosing information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that employees and service providers have reason to believe is unlawful.

Pursuant to the United States Defend Trade Secrets Act of 2016 ("DTSA"), employees and service providers shall not be held criminally, or civilly, liable under any United States Federal or State Trade secret law for disclosing a trade secret that is made in confidence either directly or indirectly to a United States Federal, State, or local government official, or an attorney, for the sole purpose of reporting or investigating a violation of law. Moreover, employees and service providers understand that they may disclose trade secrets in a complaint or other document filed in a lawsuit or other proceeding if such filing is made under seal. If an employee or service provider files a lawsuit alleging retaliation by the Company for reporting a suspected violation of the law, the employee or service provider may disclose the trade secret to employee's or service provider's attorney and use the trade secret in the court proceeding, provided employee or service provider files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

Software [↗](#)

Employees may not duplicate any licenses, software or related documentation for use either on Arctic Wolf's premises or elsewhere unless Arctic Wolf is expressly authorized to do so by agreement with the licensor. Unauthorized duplication of software may subject users and/or Arctic Wolf to both civil and criminal penalties under the United States Copyright Act.

Employees may not give software to any outsiders including contractors, customers or others. Employees may use Company-authorized software on local area networks or on multiple machines only in accordance with applicable license agreements. Employees may not download software from the internet and install it on their computers.

Arctic Wolf reserves the right to audit any company computer to determine what software is installed on the local drive(s). To prevent computer viruses from being transmitted through Arctic Wolf Systems, employees are not authorized to download any software from the internet onto their computer or any drive in that computer.

Arctic Wolf maintains virus protection software on all network servers and filters all inbound and outbound email for virus attachments. Emails identified as containing a virus will be quarantined and both the sender and recipient will be informed. If the virus can be removed, the message will be forwarded to the recipient.

Protecting Customer Information [🔗](#)

All employees must be careful in their handling of customer information. Arctic Wolf's customers trust Arctic Wolf and it is important to uphold their trust and treat all of their information in accordance with Arctic Wolf's security policies. Employees who have access to confidential customer information must take precautions to keep such information confidential. Employees must use and disclose confidential customer information only as necessary to service a customer and in accordance with applicable law. To the extent Arctic Wolf is subject to a non-disclosure agreement with its customers, employees must comply with it. Employees who have access to payment card information must take appropriate steps to comply with applicable laws, regulations and company policies and regulations pertaining to such information. Payment card information must never be stored on an unsecured computer, such as cellular phones, laptops or other unsecured devices, and should not be included in e-mail or facsimile transmissions. Employees must properly dispose of payment card information on paper documents.

Confidential customer information shall not be stored on employee-owned electronic devices. Employees must receive written approval from management prior to engaging in remote access to customer information and/or systems.

Acting with Authority [🔗](#)

In representing Arctic Wolf and acting on Arctic Wolf's behalf, employees are responsible for ensuring that they are acting within the scope of authority that Arctic Wolf has granted to them, based upon their job responsibilities. If an employee has any questions about their authority, contact your manager. Employees are not permitted to use their positions at Arctic Wolf to advocate non-company interests.

Compliance with Law [🔗](#)

Each person must act within the letter and spirit of the laws and regulations affecting Arctic Wolf's business. In the course of their employment or engagement with Arctic Wolf, employees may have frequent business dealings with suppliers, customers and competitors. Arctic Wolf expects its employees to observe and comply with all federal, state, provincial, local laws and regulations in the course and scope of their employment, including but not limited to those relating to insider trading, financial reporting, money laundering, fraud, bribery, corruption, modern slavery, environmental responsibility, safety, and fair dealing. Arctic Wolf expects employees to be ethical and responsible when dealing with its finances, products, partnerships and public image. Additionally, each employee is expected to cooperate with Arctic Wolf regarding any legal compliance programs maintained by Arctic Wolf and complete all mandatory compliance trainings as assigned.

No Corruption or Bribery [🔗](#)

Certain activities - such as providing gifts, political contributions, entertainment, and travel-related benefits or facilitating payments - can violate anti-bribery laws around the world. Arctic Wolf understands that corporate hospitality, when used correctly, can be an important way of strengthening business networks and developing relationships with suppliers, customers and other business partners. However, employees are expected to ensure that any hospitality received or given is not prohibited by local laws or regulations, is proportionate to the commercial relationship, and is not used in any way to incentivize individual actions or events. Likewise, any gift given or received in the course of doing business must be proportionate to the commercial

relationship, not made or offered in return for any specific act, must be allowable under local laws and regulations and must be approved by an appropriate supervisor. Any employee receiving a gift of \$100 or more (in local currency, whether directly or indirectly) from a customer, business partner or vendor, must first report the gift to the Chief Legal Officer (compliance@arcticwolf.com) and People Experience (peopleexperience@arcticwolf.com) with employee's supervisor copied before accepting it.

Arctic Wolf prohibits all forms of bribery in accordance with applicable laws around the world, including but not limited to the United States Foreign Corrupt Practices Act ("FCPA"), which prohibits bribery of government officials. Please refer to Arctic Wolf's Anti-Bribery and Anti-Corruption Policy for more detailed information.

Anti-Money Laundering Compliance [↗](#)

Employees at Arctic Wolf are prohibited from engaging in any activity that facilitates money laundering or the funding of terrorist or criminal activities in connection with the Company's business. Money laundering is the act of concealing or disguising the existence, illegal origins, and/or illegal application of criminally derived income so that such income appears to have legitimate origins or constitute legitimate assets. While money-laundering involves giving "dirty" money the appearance of legitimacy, terrorist financing generally involves using legally earned income to finance illegal activities. Arctic Wolf expects all individuals to comply with all applicable anti-money laundering and countering the financing of terrorism laws and regulations.

Modern Slavery [↗](#)

Arctic Wolf is committed to conducting business responsibly, ethically, lawfully and in a manner that sustains and protects our environment, our planet and people consistent with global human rights principles. Arctic Wolf does not tolerate the use of child labor, forced labor, or human trafficking in any form—including slave labor, prison labor, indentured servitude, or bonded labor—in our operations or value chain. Accordingly, all employees at Arctic Wolf are expected to conduct themselves ethically and act lawfully in alignment with Arctic Wolf's posture on modern slavery while doing business on behalf of the company. Please refer to Arctic Wolf's Modern Slavery Transparency Statement [Modern Slavery Statement](#) for more detailed information.

International Business Laws [↗](#)

Employees are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries- and obligations under the Modern Slavery Act of 2015 as applicable to our business. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. Each employee is expected to cooperate with Arctic Wolf regarding any legal compliance programs maintained by Arctic Wolf and complete all mandatory compliance trainings, including, but not limited to, the FCPA Training: Anti-Bribery and Anti-Corruption Policy Overview, as assigned.

Export Controls [↗](#)

Arctic Wolf's reach is global. The privilege of doing business globally also comes with export control obligations. Arctic Wolf is committed to doing the right thing and it appreciates that this means integrating export control checks and validations in the end-to-end processes: from product creation and development, until product delivery and use thereafter.

Antitrust [↗](#)

Antitrust laws are designed to protect the competitive process and impose severe penalties for certain types of violations, including criminal penalties. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Certain kinds of information, such as pricing, production and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be.

Conflicts of Interest

You may not take personal advantage of opportunities for Arctic Wolf that are presented to you or discovered by you as a result of your position with Arctic Wolf or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with Arctic Wolf or corporate property or information for improper personal gain, nor should you compete with us in any way. Below are just a few examples of situations that could constitute a conflict of interest:

- Using personal influence or personal relationships improperly to influence decisions or financial reporting by Arctic Wolf such that the employee would benefit personally to the detriment of the Company.
- Causing Arctic Wolf to take action, or fail to take action, for the individual personal benefit of the employee rather than the benefit of the Company.
- Using material non-public knowledge of any transactions or contemplated transactions of the Company or its customers or suppliers in order to profit personally or cause others to profit by the market effect of such transactions.
- Owning, directly or indirectly, securities or financial interests in Arctic Wolf's competitors, except for publicly traded securities where the employee's percentage of ownership is less than 1%.
- Becoming a director, officer, employee or consultant of a competitor of Arctic Wolf, or receiving income from such sources. Outside directorships may be permitted in some situations with the approval of Arctic Wolf's CEO.
- Using confidential Company information, directly or indirectly, to buy or sell securities while the Company or one of its clients is buying or selling the same securities.
- Accepting outside compensation for work for which the employee is already being paid by Arctic Wolf, or accepting outside employment that interferes in any way with the employee's role at Arctic Wolf. Individuals who hold licenses to perform services (including, for example, real estate licenses) must notify their manager in order to avoid any potential conflicts of interest.
- Deriving personal gain, directly or indirectly, from purchases made by Arctic Wolf or from other transactions to which Arctic Wolf is a party.
- Any outside activity that may interfere with the operations of the company or the employee's loyalty to the company.

Any employee who becomes aware of a transaction or relationship that could reasonably be expected to give rise to an actual or perceived conflict of interest should discuss the matter promptly with their supervisor or the Chief Legal Officer (compliance@arcticwolf.com). Supervisors may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first seeking the approval of the Chief Legal Officer and providing the Chief Legal Officer with a written description of the activity. If the supervisor is involved in the potential or actual conflict, you should discuss the matter directly with the Chief Legal Officer. Officers and directors may seek authorizations and determinations from the Audit and Risk Committee.

Use of Non-public Information

Employees, officers and directors who have access to confidential (or "inside") information are not permitted to use or share that information for stock trading purposes. All non-public information about Arctic Wolf or about other companies is considered confidential information. To use material non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision on the basis of this information, is illegal. Please refer to Arctic Wolf's Insider Trading Policy for more detailed information.

Audits and Financial Disclosures

Employees are required to fully cooperate with audits conducted by Arctic Wolf's internal audit staff or external auditing firms. Questions raised by the auditors must be responded to honestly and no adverse information may be concealed.

Arctic Wolf is required to maintain accurate financial books and records reflecting the true nature of Arctic Wolf's operations and finances. Falsification of company business documents is expressly prohibited. Any employee who becomes aware of any

departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor, the Chief Legal Officer, or the Audit Committee of the Board of Directors or one of the other compliance resources described below under “Questions and Reporting Potential Violations”.

Misappropriation of Company Opportunities [↗](#)

Each employee has a duty to advance the legitimate interests of Arctic Wolf when a business opportunity is discovered through the use of corporate property, information or position at Arctic Wolf, unless Arctic Wolf has already been offered the opportunity and has turned it down or otherwise renounced the opportunity. The following actions may be deemed violations of this Code:

- Taking for personal gain any business opportunities discovered by virtue of the employee's position with Arctic Wolf, or through the use of the company's property or information.
- Using Arctic Wolf's, or its clients', property or information for personal gain or the gain of a family member.
- Competing, or preparing to compete, against Arctic Wolf.

Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way. If you have any concerns about how to comply with this Code, you should discuss with the Chief Legal Officer.

Fair Dealing [↗](#)

Each employee must endeavor to deal fairly with Arctic Wolf's customers, suppliers and business partners, and any other companies or individuals with whom Arctic Wolf does business or comes into contact, including Arctic Wolf's competitors. Employees are prohibited from seeking competitive advantage through illegal or unethical business practices or taking unfair advantage of anyone by means of manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. For example, making disparaging remarks regarding Arctic Wolf's competitors is considered to be inappropriate and unethical. Arctic Wolf's policy is to compete fairly by emphasizing the quality and competence of its company's professionals and services. Employees must not agree, or attempt to agree, with a competitor to fix or stabilize prices, or engage in dealings with anyone if the purpose is to adversely impact the ability of another person or entity to compete in the market.

Standards of Behavior [↗](#)

To assure safety and security and provide the best possible work environment, Arctic Wolf expects employees to follow basic, common-sense rules of conduct that will protect everyone's interests and safety. It is not possible to list all forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions that may result in disciplinary action, including suspension, demotion or termination of employment:

- Falsification of employment records, employment information or other records;
- Recording the work time of another employee, allowing any employee to record another employee's work time, or allowing falsification of any timecard, whether it is the employee's timecard or another employee's timecard;
- Theft or the deliberate or careless damage of any company property or the property of any employee or client;
- Use of company materials, supplies, tools or products for personal reasons without advanced permission from management;
- Abuse of Arctic Wolf's electronic resources, including sending personal emails during working time or in a manner that interferes with the employee's work performance;
- Possessing, distributing, selling, transferring or using or being under the influence of alcohol or illegal drugs in the workplace;
- Provoking a physical fight or engaging in physical fighting during working hours or on Arctic Wolf premises;
- Carrying firearms, weapons or dangerous substances at any time, on Arctic Wolf premises, unless state law provides otherwise;
- Using abusive, violent, threatening or vulgar language at any time during working hours or while on Arctic Wolf premises;

- Abuse of Arctic Wolf's flexible workplace and time off policies;
- Failing to observe working schedules, including any required meal and rest breaks;
- Failing to provide a certificate from a health care provider when requested or required to do so in accordance with applicable law;
- Working overtime without authorization or refusing to work assigned hours;
- Violating any safety, health, security or other policy, rule or procedure of Arctic Wolf; or
- Committing a fraudulent act or intentional breach of trust under any circumstances.
- Discrimination and harassment towards others, and violation of Arctic Wolf's anti-discrimination and anti-harassment policies, including any anti-sexual harassment policies.

For employees providing services in the United States, although employment may be terminated at-will by either the employee or Arctic Wolf at any time, without following any formal system of discipline or warning, Arctic Wolf may utilize forms of discipline that are less severe than termination, within Arctic Wolf's sole discretion. Examples of less severe forms of discipline include verbal warnings, written warnings, demotions and suspensions. Although one or more of these forms of discipline may be taken, no formal order or procedures are required, and Arctic Wolf reserves the right to determine which type of disciplinary action to issue in response to any type of performance issue or rule violation. For employees providing services outside the United States, violations above may also result in disciplinary action up to and including termination of employment to the full extent permissible under applicable law.

Data Privacy [🔗](#)

As an employee of Arctic Wolf, you must respect applicable data protection and privacy laws and safeguard the Personal Data of other employees, applicants, customers, partners and all other individuals whose Personal Data will be collected or processed by Arctic Wolf. "Personal Data" relates to information allowing an individual to be identified, which includes amongst other things, names, addresses, images, and contact information. You must keep Personal Data secure and access should be limited to those who are authorized and have a need for access to such data.

Media/Public Discussions [🔗](#)

It is our policy to disclose material information concerning Arctic Wolf to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the company will have equal access to information. All inquiries or calls from the press and financial analysts should be addressed in accordance with the Corporate Disclosure Policy.

Amendments and Waivers [🔗](#)

Any waiver of this Code for executive officers or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of any stock exchange on which our capital stock is listed and our Corporate Governance Guidelines, a committee of the Board of Directors and will be disclosed to stockholders as required by applicable laws, rules and regulations. This Code may only be amended by our Board of Directors.

Questions and Reporting Potential Violations [🔗](#)

If you are aware of a suspected or actual violation of this Code, you have a responsibility to promptly report it to your supervisor,

Human Resources (hr@arcticwolf.com) for personnel matters or the Chief Legal Officer (compliance@arcticwolf.com) for ethics and business conduct matters. If you prefer to report a suspected or actual violation of this Code anonymously, follow the process for filing anonymous complaints outlined in the Whistleblower Policy as described below. The applicable recipient of the report will investigate all reported possible violations of this Code promptly and with the highest degree of confidentiality that is possible under the specific circumstances. As appropriate, the Board of Directors and/or one of its committees shall be notified of any suspected or actual violation of this Code. If any investigation indicates that a violation of this Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee, officer or director is responsible for a violation of this Code, he or she will be subject to disciplinary action up to, and including, termination and, in appropriate cases, civil action or referral for criminal prosecution to the full extent permissible under applicable law.

Pursuant to the Whistleblower Policy, you have the option to report suspected or actual violations of this Code to the Arctic Wolf Code of Conduct and Compliance Portal (<https://arcticwolf.com/report>), or the Arctic Wolf Hotline at 800-461-9330.

When making a report, please include the following details:

- Description of the activity;
- Date complainant became aware of the activity,
- Name of individual suspected of the activity; and
- Steps taken (if any) prior to making complaint or allegation (i.e. spoke with supervisor).

Please note that retaliation against employees reporting violations of this Code is prohibited and Arctic Wolf will take prompt disciplinary action against any employee, officer or director who attempts to retaliate against you for reporting violations in good faith.

No Retaliation

The Company expressly forbids any retaliation against any employee who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Specifically, the Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against such employee. Any person who participates in any such retaliation is subject to disciplinary action up to the termination of their employment to the full extent permissible under applicable law.