



Code of Conduct

Version	Date	Changes	Modified by	Approved by
1.0	02/05/2024	Procedure created	Primesec Ltd.	Ari Dobner



1. General

- 1.1. The Clearshift Code of Conduct (“Code”) is built around our belief that everything we do will be measured against the highest possible standards of ethical business conduct. Our commitment to high standards helps us hire great people, build great products, and attract loyal customers.
- 1.2. They also guide us to report any conduct considered to be a violation of the law, this Code, or any Clearshift policy. We strongly encourage you to speak up if you suspect or witness any matters of concern.
- 1.3. We take seriously all reports made under this Policy. When you report your concerns, Clearshift will support and protect you.

2. Responsibility

- 2.1. We expect all employees, contractors, consultants, and others who may be temporarily assigned to perform work or services for Clearshift to know and follow the Code.
- 2.2. Failure to follow the Code can result in termination of the employment / relationship with Clearshift.

3. Code of Conduct

- 3.1. Clearshift expect you to be honest, act ethically, and demonstrate integrity in all situations. You have a duty to follow the policies and procedures found in this Code of Conduct, as well as those that are specific to your role. You must also comply with all laws that apply to our business. Most of the time, common sense and good judgment provide excellent guideposts. If you are unsure about the right thing to do, ask the Chief Compliance Officer.
- 3.2. If you are a supervisor or a manager, you are responsible for knowing the rules and reviewing the Code of Conduct with the people who report to you to make sure they are familiar with its contents. You are also responsible for preventing violations of the Code, as well as detecting violations that may occur and reporting them appropriately.
- 3.3. Clearshift expects you to:
 - lead with integrity;
 - encourage employees to ask questions and expand their knowledge of the rules;
 - demonstrate integrity by acting promptly and effectively when necessary;
 - educate employees on compliance policies specific to their job responsibilities.

4. Equal opportunity

- 4.1. Working with Clearshift is based solely upon individual merit and qualifications directly related to professional competence.



- 4.2. We strictly prohibit unlawful discrimination or harassment based on race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law.
- 4.3. We also make reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

5. Safe Environment

- 5.1. We are committed to a violence-free work environment. We will not tolerate any level of violence or the threat of violence in the workplace.
- 5.2. We strictly prohibit violence, harassment, and bullying in any form – verbal, physical, or visual.
- 5.3. If you believe that you’ve been bullied or harassed by anyone at Clearshift, or anyone connected to Clearshift (such as a partner or vendor), please immediately report to the Chief Compliance Officer, who shall promptly and thoroughly investigate any complaints and take appropriate action.

6. Confidentiality

- 6.1. Throughout its lifecycle, all non-public information that is processed, transmitted, and / or stored by Clearshift must be protected in a manner that is consistent with our contractual and legal requirements and reasonable and appropriate for the level of sensitivity, value, and risk associated with Non-public information.

7. Information Security

- 7.1. You are responsible for using Clearshift’s computer resources properly, especially regarding information security – and you need to be thoroughly familiar with Clearshift’s Information Security policies and procedures.
- 7.2. Clearshift’s network, software, and computing hardware are a critical aspect of our company’s physical property and intellectual property. Always secure your laptop, important equipment, and your personal belongings, even while on company premises.
- 7.3. If you have any reason to believe that our network security has been violated – for example, you lose your laptop or think that your network password may have been compromised – promptly report the incident to the CISO at ciso@clearshift.us.com.

8. Intellectual property

- 8.1. Clearshift’s intellectual property rights (e. g., patents, trademarks, copyrights, trade secrets, and “*know-how*”) are valuable assets. Unauthorized use can lead to their loss or serious loss of value.



- 8.2. You must comply with all intellectual property laws, including laws governing the fair use of copyrights and trademarks.
- 8.3. You must never use Clearshift's trademarks or other protected information or property for any business or commercial venture without pre-clearance from the Marketing team.
- 8.4. Report any suspected misuse of trademarks or other Clearshift intellectual property to the Chief Compliance Officer.
- 8.5. Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Clearshift and you to criminal and civil fines and penalties. Seek advice from the Chief Compliance Officer before you solicit, accept, or use proprietary information from individuals outside the company or allow them to obtain access to Clearshift's proprietary information. You should also check with the Chief Compliance Officer if developing a product feature that uses content not belonging to Clearshift.

9. Financial integrity and responsibility

- 9.1. Financial integrity and fiscal responsibility are core aspects of corporate professionalism.
- 9.2. Each person at Clearshift has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This is applicable every time that we hire a new vendor, expense something to Clearshift, or sign a new business contract.

10. Anti-Bribery and Corruption Policy

- 10.1. The Company prohibits bribery and corruption in all its forms, including but not limited to the following: offering or giving any form of bribe, accepting or soliciting any form of bribe, making or receiving any payment for the influence of any party, engaging in potential conflict of interest activities and etc.
- 10.2. Detailed description of Anti-Bribery and Corruption procedures, risk mitigation measures, as well as roles and responsibilities are indicated in Clearshift's Anti-Bribery and Corruption Policy.

11. Reporting/Whistleblowing

- 11.1. If you have knowledge of or a concern of illegal or dishonest/fraudulent activity, please report it to our Chief Compliance Officer at **internalcompliance@clearshift.us.com**, according to this Whistleblowing Policy.
- 11.2. If you believe that you are being subjected to retaliation, please report directly to the Supervisory Authority, as follows:
 - 11.2.1. In Israel –The State Comptroller in his role as Public Complaints Ombudsman, via: ombudsman@mevaker.gov.il.



11.2.2. In Lithuania – Prosecutor General's Office of the Republic of Lithuania via:
generaline.prokuratūra@prokuratūros.lt.

11.2.3. In US - Office of the Whistleblower, via:
<https://www.sec.gov/whistleblower/submit-a-tip>

11.3. Please note that an employee who intentionally files a false report of wrongdoing will be subject to disciplinary action.

12. Compliance

12.1. The Chief Compliance Officer will verify compliance with this Code through various methods (e. g., periodic manager reviews, tool reports, internal and external audits, and employee feedback).

12.2. Any exception to this Code must be approved by the Chief Compliance Officer in writing.

12.3. Any employee who violates this Code may be subject to disciplinary action, up to and including termination of employment in addition to any civil and criminal liability.

12.4. All records relating to this Code will be securely and confidentially maintained.

13. Your Annual Acknowledgment of the Code of Conduct

13.1. Once each year, as a condition of your employment, you are required to acknowledge that you have received the Code of Conduct and understand its rules. New employees will sign an acknowledgment when they start with the company. Basically, your annual acknowledgment confirms that:

- you have reviewed the Code of Conduct, and you are required to comply with the Code of Conduct; you will comply with the compliance policies and procedures, as well as policies and procedures related to your job responsibilities;
- you will report any questions or concerns about suspected or actual violations of the Code to Clearshift's Chief Compliance Officer;
- to the best of your knowledge, you have not acted contrary to the Code of Conduct.

Name: _____

Role: _____

Signature: _____

Date: _____