



VERISIGN<sup>®</sup>

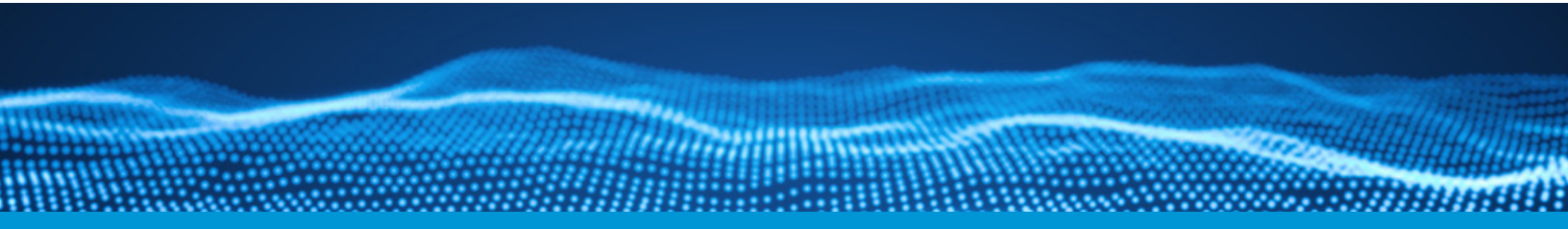
**CODE OF CONDUCT**

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**POWERED BY**

**OUR**

**VALUES**



# CONTENTS

## A MESSAGE FROM JIM

3

## WE UPHOLD OUR MISSION & VALUES

Our Mission & Values

4

Our Responsibilities

5

Speaking Up and No Tolerance for Retaliation

7

Making Decisions with Our Values in Mind

9

## WE RESPECT OTHERS

10

Diversity & Inclusion

10

Maintaining a Respectful and Safe Workplace

11

Respecting Human Rights

14

## WE PROTECT OUR COMPANY AND BUSINESS

15

Keeping Information Secure

15

Preserving Privacy

17

Safeguarding Our Assets

18

Communicating Publicly

20

Using Social Media

21

## WE DO WHAT'S RIGHT

22

Avoiding Conflicts of Interest

22

Exchanging Gifts and Entertainment

23

No Tolerance for Corruption

25

Working with Governments as Customers

27

Competing Fairly

28

Complying with International Trade Regulations

30

Buying and Selling Stock

31

## WE INVEST IN OUR COMMUNITIES

32

Making a Difference in Our Communities

32

Protecting the Environment

33

Participating in Political Activities

34

*For purposes of our Code of Conduct (the "Code"), the term "Verisign" refers to VeriSign, Inc. and its consolidated subsidiaries.*



# A MESSAGE FROM JIM

Team,

Each of us understands the power the internet has to connect the world. At Verisign, “what we do” and “how we do it” are vital to the security, stability, and resiliency of the DNS and the internet, which billions of people worldwide depend on every second of every day. As stewards of the internet, we understand the gravity of our work and our mission – and the potential impact if we do not carry out this mission with the highest level of integrity, accountability, and transparency.

Our mission and values combine to form Verisign’s DNA. The principles contained in them support the three pillars of our strategic framework: Protect, Grow, and Manage. Every year, we develop corporate goals that support this strategy. In turn those goals, along with our mission and values, guide our day-to-day operations and individual actions.

Our Code of Conduct sets the expectation for how we will conduct ourselves in relation to Verisign, to each other, and to our external stakeholders in support of our overall mission and business goals. Our Code not only establishes the high standards expected of us, but the standards to which we hold each other.

As a member of the Verisign family, you agree to abide by applicable laws, this Code, and Verisign’s policies in all aspects of your daily work. It is the responsibility of every one of us to read and understand this Code. It is a tool to help you understand your responsibilities as an employee and as a member of the Verisign community. Like any tool, the Code will not answer every question that you may have regarding your responsibilities. If you have any questions about whether your or anyone else’s actions are consistent with this Code, reach out to your manager or one of the other Verisign resources identified in the Code.

This Code applies to every level of our business from employees to officers and directors. In addition, we expect all of Verisign’s contractors, consultants, agents, representatives, and suppliers to abide by contractual requirements and our Code as it applies to their work with Verisign.

By taking responsibility for our actions, we demonstrate respect for all of our stakeholders, including customers, shareholders, business partners, internet users, and fellow colleagues. By behaving with integrity, we live our mission and values. By embracing new technology and continuous improvement, we each play a role in laying the cornerstones of responsible stewardship.

Let’s work together to meet the challenge of our mission. Represent us well and ensure your actions reflect the strong character of Verisign and its culture.



Jim Bidzos  
Executive Chairman and Chief Executive Officer  
Verisign





# WE UPHOLD OUR MISSION & VALUES

## Our Mission & Values

Our mission and values are at the center of everything we do. They define us as a Company, guide us as employees, and give us something to aspire to. Allowing our mission and values to drive our work enables us to attract and retain talented employees from diverse backgrounds, provide excellent service to our customers, and empowers every member of the Verisign family to do the right thing – always.

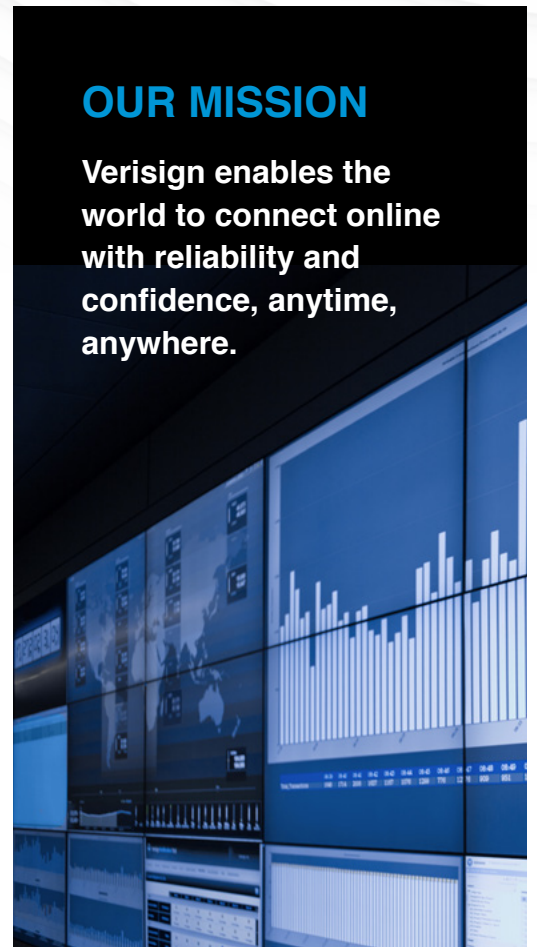
Complying with the law is the starting point, but not where we stop. Our actions and the actions of everyone with whom we do business represent who we are as a Company. So, we make sure those actions always reflect our values and the high standards we set for ourselves – even when it's not easy to do.

Our Code represents our values and it applies to everyone at Verisign – employees, officers, and directors. We also expect all of Verisign's contractors, consultants, agents, representatives, suppliers, and anyone working on our behalf to abide by the requirements of our Code.

Our Code is meant to provide an overview of our policies in many areas of compliance. For detailed guidance on specific topic areas, review the policies referenced in the Additional Resources section of each topic area.

## OUR MISSION

**Verisign enables the world to connect online with reliability and confidence, anytime, anywhere.**



## OUR VALUES



### **We are stewards of the internet and our Company.**

Billions of people and a significant portion of the world's economy rely on the internet infrastructure we help to manage and operate. As stewards of the internet and our Company, we work to ensure every decision and action preserves the trust people place in us and creates value for our shareholders.



### **We are passionate about technology and continuous improvement.**

We embrace new technologies, ideas, and the potential they promise. We also challenge past assumptions and do not accept that what works today will work tomorrow. This enables us to continue building, sustaining, and improving on the internet's infrastructure.



### **We respect others and exhibit integrity in our actions.**

The internet has made the world a smaller place, so the way we do business is more important now than ever. That's why we demonstrate respect and integrity in all of our interactions with our stakeholders — customers, shareholders, business partners, internet users, and each other.



### **We take responsibility for our actions and hold ourselves to a higher standard.**

We understand that the role we play in supporting the global internet is a privilege and with that privilege comes great responsibility. We appreciate that our decisions and actions have consequences far beyond our own Company. Therefore, we hold ourselves to a higher standard in all we do.



## Our Responsibilities

Many of us came to work at Verisign because of what we do – we enable the world to connect online with reliability and confidence, anytime, anywhere. We wanted to share in that mission by playing a role in preserving, protecting, and improving the internet.

Just as our mission inspires us and helps to motivate us, the values we have inform our decisions and help every day to clarify the best choices. Our values guide our interactions with each other and those with whom we do business. As a member of the Verisign team, we expect you to live our values by doing the **right** thing, not the easy thing.

Our success depends on you. One poor decision can damage our reputation and the workplace we have built. It can even have legal consequences. That is why it is important that you always use good judgment and follow the law, our Code, and policies.



### THE VERISIGN STORY

Verisign was incorporated on April 12, 1995



How can you do your part? Meet your commitment to our mission and values by:



**Knowing our Code.** Read our Code, understand it, and use it to guide your decisions.



**Living our values.** Be accountable and honest. Use good judgment and make ethical decisions.



**Treating others with respect.** Whether it's a coworker, supplier, customer, or guest of Verisign, treat them with respect and dignity – the way you would want to be treated.



**Asking for help.** If you are ever unsure of something, ask for help and if someone asks you for help, give it.



**Speaking up & cooperating with investigations.** If you have a concern, let someone know and if asked to participate in an investigation, be sure to respond to any requests promptly and provide complete and accurate information.

Leaders at Verisign are held to a higher standard. In addition to your responsibilities as an employee you must:



**Lead with integrity.** Model ethical behavior and inspire others to follow your lead.



**Foster an ethical culture.** Ensure your team understands our Code and policies and knows to speak up if they have a concern.



**Listen.** Keep an open door and make your team feel heard when they come to you with concerns. Give sound advice and help them make good decisions.



**Promote a diverse, inclusive, and equitable workplace.** Create an environment where everyone has the ability to contribute, feels valued, and has equitable access to the tools, resources, and information needed to succeed.



**Seek and provide help.** There will be times where you won't know the right answer – and that's okay. In those situations, it is important that you ask for help or escalate your concern. If a coworker asks for help, be generous and provide assistance.



**Protect against retaliation.** Never tolerate retaliation in any form and take positive action to prevent retaliation against others.



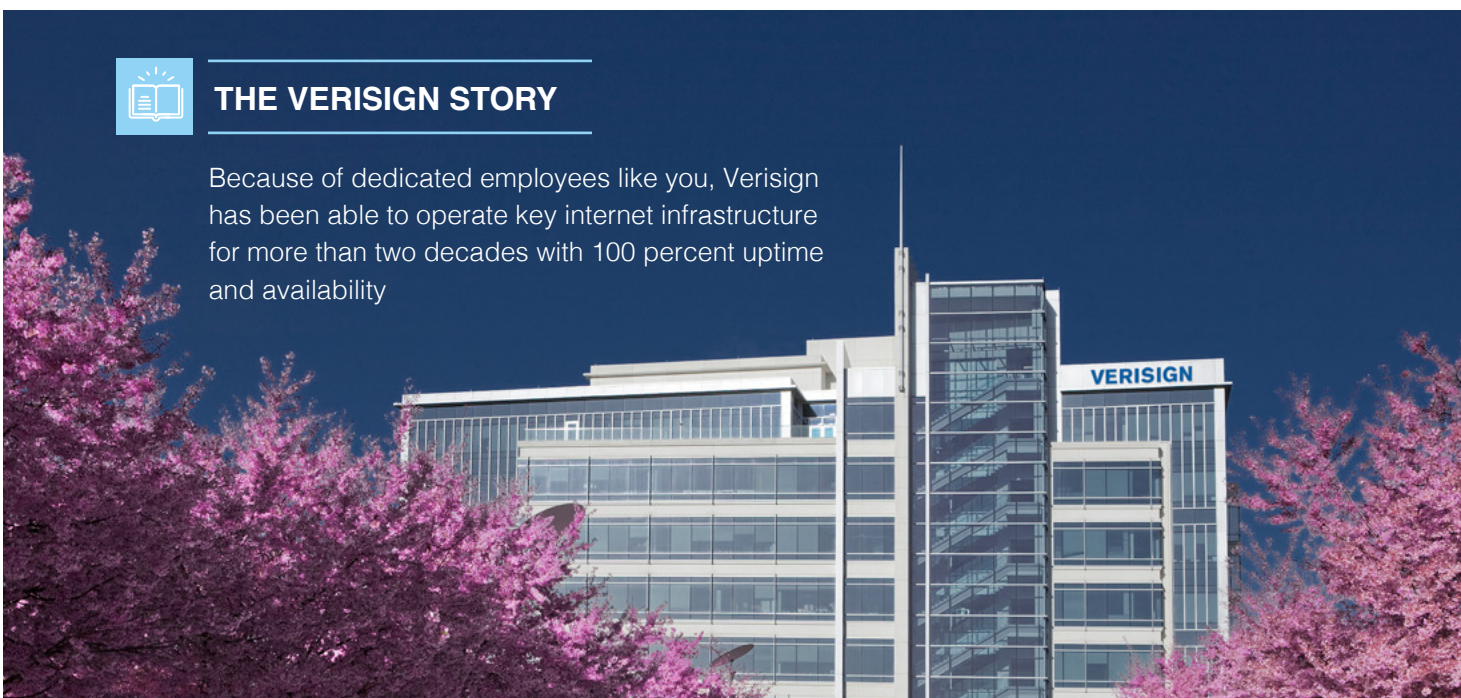
## ADDITIONAL RESOURCES

[Standards of Conduct](#)



## THE VERISIGN STORY

Because of dedicated employees like you, Verisign has been able to operate key internet infrastructure for more than two decades with 100 percent uptime and availability





## Speaking Up and No Tolerance for Retaliation

Our culture is the result of the decisions we make every day. When we do the right thing or take action when we suspect misconduct, we strengthen our culture. However, if we fail to do so, it can harm the culture and reputation we've built.

We depend on you to help protect our culture and reputation by speaking up when you suspect misconduct. That's why we offer several ways for you to raise concerns and we never tolerate retaliation against anyone for raising a concern in good faith.

If you have a concern or question, you can go to any one of the following resources. No matter how you choose to raise a concern, it will be kept confidential to the fullest extent possible, investigated, and responded to appropriately.

- **Your Manager**
- **Human Resources**
- **Another Verisign Leader**
- **Ethics & Compliance**
- **Other appropriate departments, such as Law Department or Information Security**
- **The Ethics Helpline:**
  -  **Online: [VerisignEthicsHelpline.com](https://www.verisign.com/ethics)**
  -  **Phone: 1-888-353-5715**

Members of the Board of Directors should contact the Compliance Officer or the Chair of the Corporate Governance and Nominating Committee with questions or to report misconduct.

## No Tolerance for Retaliation

We do not tolerate retaliation against anyone who raises a concern in good faith, participates in an investigation, or asks a question. Anyone found to have violated our Harassment, Discrimination and Retaliation Prevention Policy will be subject to disciplinary action, up to and including termination.

### ADDITIONAL RESOURCES:

[Harassment, Discrimination and Retaliation Prevention Policy](#)



### THE VERISIGN STORY

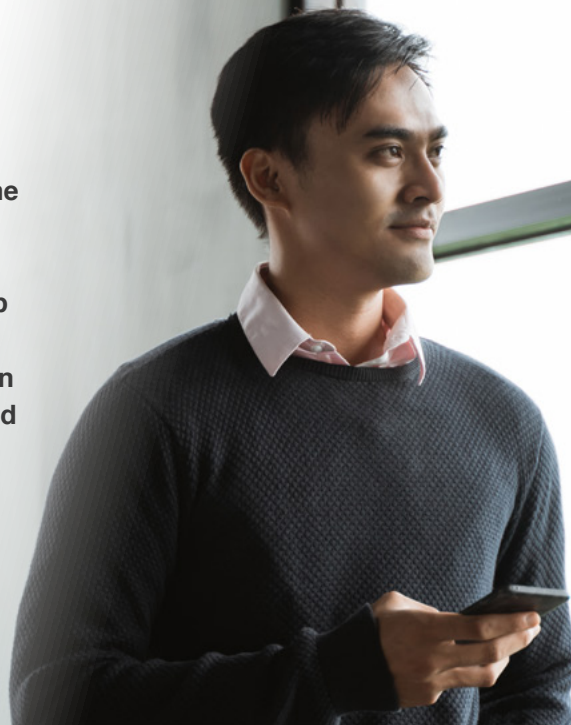
In 1985 the first .com name was registered – Symbolics.com





## Did You Know?

When reporting a concern, your manager or HR should be where you start but if for any reason that is not an option the Ethics Helpline is also an option. Our Ethics Helpline is run by an external vendor and reports can be made anonymously through the phone or web options. Anyone reporting anonymously can use a PIN, provided by the vendor, to check on report status. We take all reports seriously and carefully investigate each allegation.



### Q. I BELIEVE MY MANAGER MAY HAVE ENGAGED IN MISCONDUCT AND I AM WORRIED THAT IF I SAY SOMETHING, IT WILL AFFECT MY CAREER. WHAT SHOULD I DO?

A. You should always feel comfortable speaking up, even if the concern is about your manager. If you do not feel comfortable identifying yourself, you can raise your concern anonymously through the [Verisign Helpline](#). We do not tolerate retaliation against anyone for raising a concern in good faith. If you speak up and believe that someone may be retaliating against you, report your concern about retaliation. We will investigate any concern you raise and take appropriate action.

### Q. SHOULD I REPORT A CONCERN EVEN IF I AM NOT SURE SOMETHING IS WRONG?

A. Yes. As long you are raising your concern in good faith, meaning you have an honest concern that something is not right, that is enough. You do not have to be sure. We will investigate the matter carefully and determine whether an actual violation has occurred.



Q&A

## Making Decisions with Our Values in Mind

There might be times when you encounter a situation where the right decision isn't clear. That's when your ability to make sound decisions matters the most. Let our values be your guide to doing the right thing.

How can you ensure you are making the right choice?

### ASK YOURSELF THE FOLLOWING QUESTIONS:

- Does it align with our mission and values?
- Is it compliant with the law, our Code, and policies?
- Would you feel comfortable if it were in the news?
- Would you want it to happen to you?



# WE RESPECT OTHERS

## Diversity & Inclusion

### What We Believe

Our workforce consists of people with many different backgrounds, experiences, and perspectives. The diversity of our team drives innovation and is a key component to our success. That's why we work to foster a diverse and inclusive workplace where everyone feels valued and is able to contribute to the success of Verisign.

### How We Work

Verisign maintains a workplace where every employee has an equal opportunity to succeed. That means we base all employment decisions on merit – never on race, color, religious creed, ancestry, sex, gender, gender identity, gender expression, pregnancy, childbirth and related medical conditions, marital status, military service or veteran status, age, national origin, physical disability, mental disability, medical condition (cancer or genetic characteristics or as defined by applicable state or international law), sexual orientation, genetic information, or any other characteristic protected by applicable law.

### Did You Know?

Employment decisions include any decisions about the terms and conditions of employment, such as:

- Hiring
- Job assignments
- Recruitment
- Pay and other forms of compensation
- Promotions
- Discipline and termination



### ADDITIONAL RESOURCES:

[Harassment, Discrimination and Retaliation Prevention Policy](#)



### THE VERISIGN STORY

In 1999, Verisign entered into the first registry agreement with ICANN covering .com, .net and .org

**Q. WHEN MY MANAGER FOUND OUT I WAS PREGNANT, SHE GAVE MY COWORKER THE PROMOTION THAT I WAS SUPPOSED TO RECEIVE. SHE TOLD ME THAT THE JOB WOULD BE STRESSFUL AND BAD FOR THE BABY. THE NEW ROLE WOULD HAVE BEEN PERFECT FOR ME. CAN SHE DO THAT?**

A. No, your manager can't base a promotion decision on a protected characteristic like pregnancy. You should contact your Human Resources Business Partner or the [Verisign Helpline](#) and share your concern.



# Maintaining a Respectful and Safe Workplace

## What We Believe

One of the reasons we are able to attract and retain talented people is because we maintain a safe workplace where people are treated with fairness and respect. We do not tolerate harassment, discrimination, or bullying in any form and always do our part to maintain a respectful workplace.

## How We Work

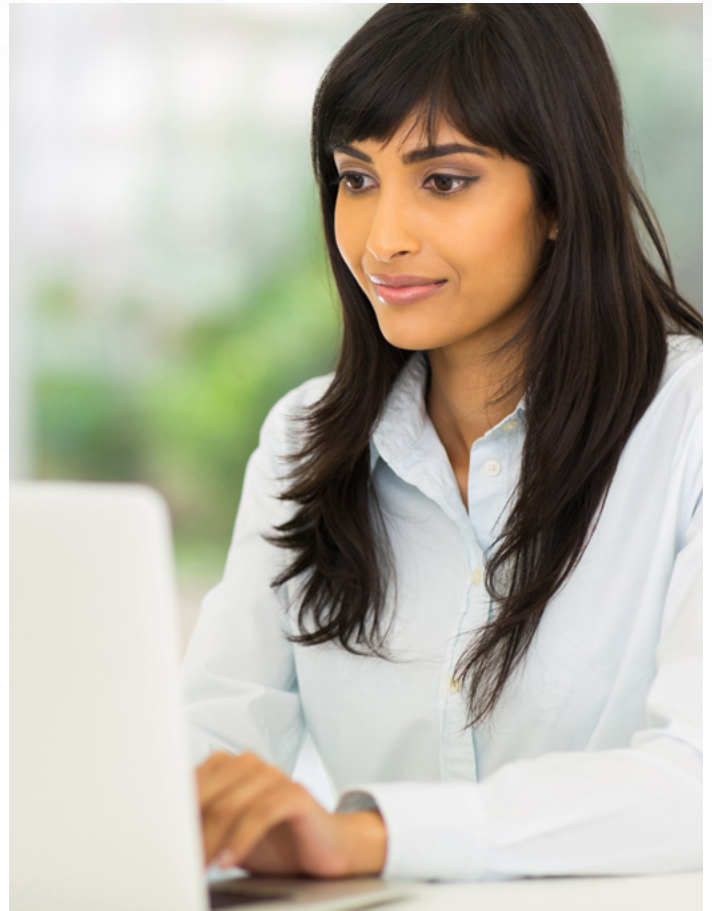
We create a productive and safe workplace where employees treat each other with respect and compassion. Everyone deserves to be treated fairly and with respect, which is why we don't tolerate discrimination, harassment, or bullying anywhere in our business.

Discrimination means treating someone differently because of the individual's race, color, religious creed, ancestry, sex, gender, gender identity, gender expression, pregnancy, childbirth and related medical conditions, marital status, military service or veteran status, age, national origin, physical disability, mental disability, medical condition (cancer or genetic characteristics or as defined by applicable state or international law), sexual orientation, genetic information, or any other characteristic protected by applicable law.

A respectful workplace is also one that's harassment-free. Harassment is unwelcome conduct that creates an intimidating, offensive, or hostile work environment. It can be:

- **Visual** – Offensive posters or displays
- **Verbal** – Bullying, suggestive jokes, flirting, negative stereotyping, or derogatory comments
- **Physical** – Unwanted physical contact, sexual advances, or requests for sexual favors

Help maintain our respectful and safe workplace by **speaking up** about any questionable behavior. Also, be aware how your actions could be perceived by others. Something that might be okay to you might be offensive to someone else.



## Workplace Safety & Security

Just like we protect our employees from harassment, discrimination, and other disrespectful behavior, we maintain a workplace that's safe and secure. We do not tolerate workplace violence and strive to ensure the safety of everyone on our premises.

Examples of workplace violence include:

- Hitting or shoving
- Aggressive or hostile behavior
- Stalking – physical and cyber-stalking
- Physical acts that are related to sexual harassment or domestic violence

If you witness violent behavior, don't escalate the situation. Remove yourself if possible, and immediately report it to the **Security Response Center (SRC)**, your manager or another Verisign leader, or your Human Resources Business Partner.

Weapons of any kind are not permitted anywhere on our property outside of law enforcement personnel and authorized outside contractors providing security services. If you suspect that an unauthorized person has a weapon on our premises, it's important that you report it immediately to the **Security Response Center (SRC)** in the United States or, if outside the United States, immediately to the local authorities and then to the SRC when it is safe to do so.



### THE VERISIGN STORY

In 2000, Verisign acquired Network Solutions including the operations of the .com and .net top level domains



## Alcohol and Drug-Free Workplace

Part of our commitment to ensuring a safe and healthy workplace includes keeping it drug and alcohol free. Drugs and alcohol can affect your judgment and cause health and safety issues. That's why we prohibit working under the influence of any intoxicating substance. We also do not tolerate the sale, distribution, manufacture, or purchase of illegal drugs, intoxicants, or controlled substances or any attempts to do so.

While we prohibit working under the influence of alcohol, we understand there's a time and a place for responsible alcohol consumption. If attending a Verisign-sponsored event where alcohol is served, be professional and use good judgment. Make sure that you don't attempt to work or conduct Verisign business if your judgment is impaired. Comply with the law and never put yourself and others at risk by drinking and driving. Your conduct can have an impact on our reputation even outside of work, so act responsibly and in line with our Code.


## Did You Know?

Our Harassment, Discrimination and Retaliation Prevention Policy applies even at off-hour or off-site business events, such as holiday parties or business travel.

### ADDITIONAL RESOURCES:


[Harassment, Discrimination and Retaliation Prevention Policy](#)  
[Physical Security Policy](#)

[Policy Against Workplace Violence](#)  
[Alcohol and Drug-Free Workplace Policy](#)  
[Background Investigation Policy](#)



**Q. ON A VIDEO CALL, A COWORKER SAID THE POSTER IN MY BACKGROUND WAS OFFENSIVE. I DON'T NEED TO TAKE THE POSTER DOWN, RIGHT?**

A. Everyone has a right to a workplace that's free of hostile, intimidating, or offensive conduct. What's offensive to them may be different from what's offensive to you, so the best thing to do in this situation is to avoid displaying the poster while on a work video call. Another alternative is to contact your HRBP to seek guidance on the situation.



**Q. I WANT TO HOST AN OFFSITE EVENT WITH MY TEAM, CAN ALCOHOL BE SERVED AT THE EVENT?**

A. For any Verisign-sponsored event that involves alcohol, you need to follow the [Alcohol and Drug-Free Workplace Policy](#) which includes obtaining the express pre-approval of your Executive Leadership Team member.



## Respecting Human Rights

### What We Believe

We're committed to respecting internationally recognized human rights and complying with the applicable laws of the places where we operate, which include employment laws. In addition, we do not tolerate human rights abuses in our operations and supply chain.

### How We Work

Respecting the dignity and rights of every person is part of our DNA. Not only do we follow all applicable human rights laws everywhere we do business, we work with others in our industry to proactively enhance the impact our business has on the protection of human rights.

We expect you to help us uphold our commitment to human rights by acting responsibly and by not knowingly working with any company or individual that violates employment laws or engages in human rights abuses, including:

- Unlawful child labor
- Forced labor
- Unlawful physical punishment
- Human trafficking
- Unlawful discrimination

If you suspect a vendor or other third party is engaging in any activity that goes against our commitment to human rights, raise your concern to your manager or [Ethics and Compliance](#).



### THE VERISIGN STORY

In 2005, ICANN awarded the .net registry agreement to Verisign after a competitive bid process



**Q. I HEARD ON THE NEWS THAT ONE OF OUR OVERSEAS SUPPLIERS MAY BE ENGAGING IN UNLAWFUL LABOR PRACTICES. SINCE I DON'T MANAGE THAT RELATIONSHIP OR KNOW MUCH ELSE ABOUT THE VENDOR, SHOULD I SAY SOMETHING?**

A. Yes. Even if you don't work with the supplier, you should always speak up if you suspect a third party with whom we do business might be engaging in activity that doesn't align with our values.



# WE PROTECT OUR COMPANY AND BUSINESS

## Keeping Information Secure

### What We Believe

Technology and electronic information sustain our business. Keeping them secure is one of our highest priorities.

### How We Work

Our technology includes assets like Verisign systems, networks, email, computers, and phones. If our technology is misused or our policies and standards are not followed, others outside of Verisign can gain access to our systems and information, which can harm our business and its reputation.

Keep our technology secure by:

- **Complying with our policies and standards.** Our Information Security Policy and Standards and internal controls are designed to keep our network, systems, and devices secure, which is why it's important that you read, understand, and follow them, and never do anything to compromise the safety of our devices or network
- **Handling our technology with care.** Never leave Verisign devices where they could be accessed by others, lost, or stolen. Use Verisign technology and systems in line with our policies and standards. Be aware that unapproved software, applications, or storage devices can introduce security threats, so never use any unauthorized technology on a Verisign device
- **Keeping your accounts secure.** Do not share your password, access codes, or let others use your accounts
- **Knowing how we protect our technology.** Verisign may take measures to keep its systems safe, such as blocking offensive, illegal, and non-business-related sites, or any other site or internet services that are inconsistent with our values, Code, or that could be dangerous
- **Being cautious.** Hackers and other outsiders may attempt to compromise our network and systems through phishing and other forms of social engineering. Never click on a suspicious link in an email or provide Verisign information to someone you don't know, even if they say they work for Verisign

Not only do we need to take measures to protect Verisign technology, it's equally important that we protect any confidential information that may be stored on Verisign devices or systems. Examples of confidential electronic information include materials produced for internal use, such as handbooks, policies, organizational charts and technical documents, as well as our ideas, inventions, trade secrets, and source code.



Help us keep our information secure by:

- Following our [Information Security Policy and Standards](#)
- Complying with all required security measures and internal controls for your computer system, devices, laptops, and other storage devices
- Disclosing confidential information only to people who are authorized to have it and sharing only what is required
- Always labeling and classifying data in emails, computers, documents, or other Verisign assets according to our [Data Classification and Handling Standard](#)

Your responsibility to protect confidential information also applies to information shared with us by third parties. Maintain the confidentiality of third-party information and don't share it without permission.

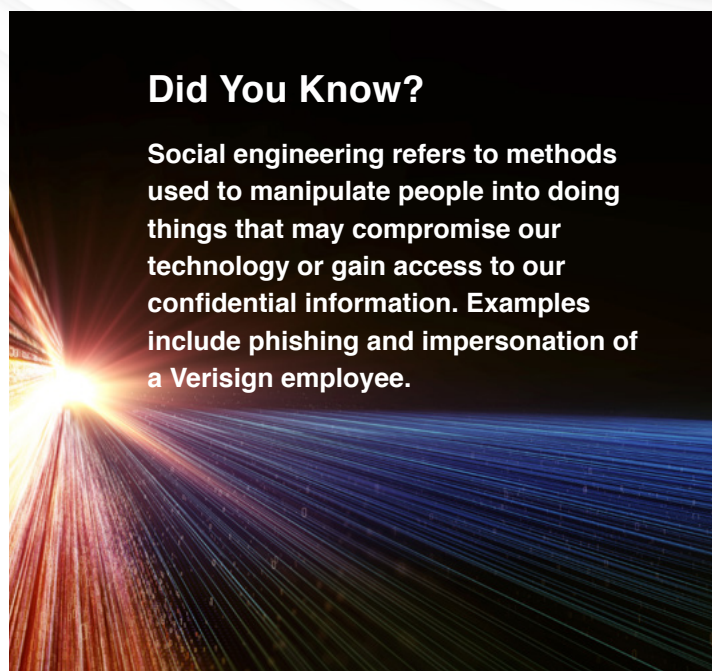


**Q. I RECEIVED AN EXTERNAL EMAIL THAT IS UNEXPECTED FROM A VENDOR I HAVE NOT USED RECENTLY REQUESTING TO DOWNLOAD AN OVERDUE INVOICE FOR PROCESSING. THE EMAIL SEEMS SUSPICIOUS. WHAT SHOULD I DO?**

A. You are correct to be suspicious. Unexpected emails that are externally tagged and requesting you click on links or open attachments may be phishing attempts. You should forward the email to [Phish](#) for analysis. The Phishing Response Team will then confirm if the email is legitimate and safe to proceed.

## Did You Know?

**Social engineering refers to methods used to manipulate people into doing things that may compromise our technology or gain access to our confidential information. Examples include phishing and impersonation of a Verisign employee.**



## ADDITIONAL RESOURCES:

[Information Security Policy and Standards](#)



## Preserving Privacy

### What We Believe

When employees, customers, vendors, and others share their personal information with us, they're placing a high level of trust in our Company. We preserve their trust by protecting their privacy and handling their information with care.

### How We Work

Personal information refers to any information that could be used to identify someone, such as their name, address, or phone number. It also includes information which, when combined with other data, may be used to identify a person. There are data privacy laws that govern how we can collect, store, use, share, or dispose of personal information. We follow these laws and protect any personal information that's entrusted to us.

Do your part to protect people's personal information:

- Follow applicable data privacy laws and our policies
- Only use information that's shared with you in ways that are authorized or would be expected by the person to whom the information pertains
- Never do anything to compromise the privacy of others

If you ever suspect that personal information has been compromised, report the situation immediately to your manager and Information Security.



### ADDITIONAL RESOURCES:

[Verisign Privacy Statement](#)



**Q. EMPLOYEES ON MY TEAM GAVE ME THEIR PERSONAL CELL PHONE NUMBERS SO THAT WE CAN PLAN A SURPRISE BIRTHDAY CELEBRATION AT THE OFFICE FOR A COLLEAGUE. IS IT OKAY IF I USE THAT INFORMATION TO PLAN THE CELEBRATION?**

A. Yes. Employees provided that information to you so that you can plan the birthday celebration, so it's fine if you use it for that purpose, just follow our policies and protect the privacy of their information.



## Safeguarding Our Assets

### What We Believe

We properly use and protect our assets and those entrusted to us, which is how we continue to deliver on our mission to enable the world to connect. We are good stewards of all of Verisign's assets and treat them like our own.

### How We Work

Our assets are the tools we use to conduct our work. They include:

- **Physical assets** – furniture, office supplies, facilities, and property
- **Financial assets** – cash, credit cards, and invoices
- **Technology assets** – Verisign's systems, computers, network, and data storage
- **Information assets** – physical documents, electronically stored information, and intellectual property
- **Our Reputation** – how people perceive Verisign and our image and brand

We depend on you to take care of all of our assets:

- Protect physical, financial, and technology assets from theft, fraud, waste, misuse, or damage
- Use our assets appropriately, in accordance with our policies
- Obtain all appropriate reviews and approvals before making financial transactions or commitments
- Always label and classify data in emails, computers, documents, or other Verisign assets according to our [Data Classification and Handling Standard](#)
- Implement and comply with all required information security practices



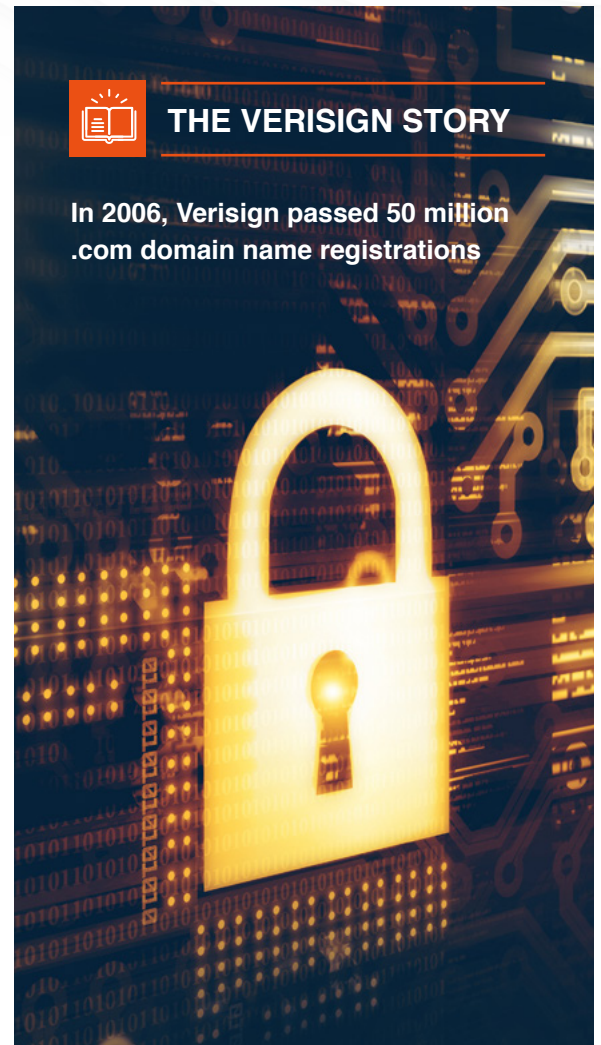
### Intellectual Property

Intellectual property is among our most important assets and includes our technology, information, copyrights, patents, trade secrets, and the Verisign brand and trademarks. Understand our different types of intellectual property and protect them by understanding how and when to make appropriate uses and disclosures. Also, respect the intellectual property rights and confidential information of others. If you receive intellectual property of others, or you become aware that another Verisign employee has someone else's intellectual property or confidential information, and you are unsure about whether you or Verisign is authorized to have or use it, please contact the Law Department immediately.



### Recordkeeping and Records Retention

Our records are another type of asset that's critical to our business operations. These assets include both physical and electronically stored documents and records. Our records allow us to meet our business, regulatory, and legal obligations, so it's important that they accurately reflect our business activities.



Practice good record management:

- Follow all internal controls in recording and maintaining our books and records
- Be alert to and report suspicious, false, or misleading transactions to the Law Department
- Protect, retain, manage, and store records properly and in accordance with our policies
- Never misrepresent, falsify, alter, or destroy anything that may be relevant to current or potential legal action, investigation, or that may be subject to a “legal hold”

Our records also include legal agreements, such as contracts. When entering into an agreement on behalf of Verisign, make sure that you follow all our procurement and contracting processes including obtaining all appropriate approvals and legal review of the terms and conditions before entering into any agreement. If you have any questions, seek help from the Law Department.

## Did You Know?

Limited personal use of our technology is okay, but always comply with our policies and never let it interfere with the performance of your job duties.

### ADDITIONAL RESOURCES:

[Facilities Use Policy](#)

[Technology Asset Management Policy and Standards](#)

[Data Classification and Data Handling Standard](#)

[Global Brand Guidelines](#)

[Information Security Policy and Standards](#)

[Records Retention Policy](#)

[Legal Hold Policy and Procedures](#)

[Statement of Policy Regarding Reports of Questionable Accounting and Auditing Matters](#)

[Sourcing and Procurement Policy](#)

[Risk Based Approval Policy](#)



**Q. I WAS RECENTLY CATCHING UP WITH AN OLD FRIEND OVER DINNER AND THEY ASKED ME HOW WORK WAS GOING. I AM EXCITED ABOUT THE WORK I DO FOR VERISIGN SO I SHARED SOME OF THE COOL PROJECTS I AM WORKING ON. I TOLD THEM TO KEEP IT BETWEEN US AND THEY PROMISED THEY WOULD. WAS THIS OK?**

A. Probably not. If the projects you are working on have not been announced publicly then you inadvertently shared confidential information. We must always be careful about keeping confidential information to ourselves.



## Communicating Publicly

### What We Believe

What we say publicly shapes how people view our Company. We want to offer a consistent, complete, and accurate message, which is why only certain people are authorized to speak on our behalf.

### How We Work

Help us protect our reputation and ensure that the public, media, the multi-stakeholder community, and government agencies have accurate information about our Company:

- Don't speak on our behalf unless you have permission to do so
- If you receive a request from the media, forward the request to **Strategic Communications**
- Requests for information from investors and financial research analysts must be forwarded to the **Investor Relations Department**



### THE VERISIGN STORY

In 2010, Verisign celebrated the 25 year anniversary of the .com top level domain.



### ADDITIONAL RESOURCES:

[Social Media and Internet Postings Policy](#)

[Global Brand Guidelines](#)



**Q. A REPORTER CALLED ME ASKING ABOUT A VERISIGN TOP-LEVEL DOMAIN. I KNOW ABOUT THE DOMAIN AND HOW IT OPERATES SO I'M ABLE TO ANSWER THE QUESTIONS, BUT SHOULD I?**

A. We need to speak with one voice so, for your own protection and to comply with our policies, you should not answer the questions and forward the request to **Strategic Communications**.

## Using Social Media

### What We Believe

Social media is a useful tool to connect with people socially and professionally. When we use social media, we do so responsibly and use good judgment.

### How We Work

While we support your personal use of social media, it's important that you be careful about what you post online and make sure to follow our policies. This is especially true if part of your job involves posting about Verisign, its business, products, customers, or business partners.

When using social media to post content related to Verisign:

- Be transparent about your connection to Verisign
- Be truthful and ethical
- Don't disclose confidential or nonpublic information
- Don't use Verisign marks and respect copyrights, trademarks, and intellectual property
- Be lawful
- Do not respond to inquiries about Verisign on behalf of our Company

Although we are focused on your use of social media as it relates to Verisign, it is crucial to remember that anything that you say on social media, including under an alias or in a seemingly private forum, could become public and be attributed to you.



### ADDITIONAL RESOURCES:

[Social Media and Internet Postings Policy](#)

[Global Brand Guidelines](#)



### Q. CAN I SHARE THAT I WORK AT VERISIGN ON SOCIAL MEDIA?

A. Yes. There's nothing wrong with letting people know that you work for Verisign – just be sure to follow our policies and avoid speaking on behalf of our Company.



# WE DO WHAT'S RIGHT

## Avoiding Conflicts of Interest

### What We Believe

We do our best work when we are objective and free of bias. Conflicts of interest can interfere with our ability to do that, so we avoid any situation that can cause an actual, potential, or perceived conflict of interest and we never use our professional position for personal gain.

### How We Work

A conflict of interest is any situation where a possibility exists for divided loyalties between your personal interests and your obligations to Verisign. While it's not possible to identify every situation that can present a conflict of interest, the following are a few areas where they typically arise:

- **Personal relationships**, such as having a direct or indirect reporting relationship with a family member or romantic partner, which is prohibited at Verisign
- **Financial interests** in a company that is a current or potential supplier, reseller, customer, or competitor of Verisign
- **Gifts and entertainment** exchanged with actual or potential customers, vendors, and other Verisign employees
- **Outside employment**, including a second job or an outside business
- **Outside affiliations** with a group outside Verisign, such as serving on a board of directors of a nonprofit, an advisory board, or taskforce

We must avoid conflicts of interest and must never use another person to do something we shouldn't do ourselves. If you have questions or are unsure if a situation creates a conflict of interest, contact [Ethics and Compliance](#).

### ADDITIONAL RESOURCES:

[Avoiding Conflicts of Interest](#)

[Global Travel and Related Entertainment Policy and Guidelines](#)

[Global Expense Reimbursement Policy](#)



**Q. I JUST MOVED INTO A NEW CONDO AND WANT TO JOIN OUR HOMEOWNER'S ASSOCIATION BOARD. THE HOMEOWNER'S ASSOCIATION MEETS OUTSIDE OF WORKING HOURS AND WON'T INTERFERE WITH MY WORK AT VERISIGN. DO I NEED PREAPPROVAL?**

A. No. Outside affiliations that are not related to the internet or technology industry, Verisign's current business interests, or your job don't require pre-approval. If you have questions, or need guidance, contact [Ethics and Compliance](#).

### Did You Know?

Certain outside affiliations or employment, may require preapproval. More details can be found in our Avoiding Conflicts of Interest Policy.



## Exchanging Gifts and Entertainment

### What We Believe

Exchanging gifts and entertainment is often a normal part of doing business, but if you're not careful, they can create an obligation, conflict of interest, or be perceived as a bribe.

### How We Work

When it comes to exchanging gifts with coworkers or third parties, know the difference between what's acceptable and what's not.

#### Gifts are appropriate if they are:

- Reasonable under the circumstances and not lavish
- Occasional and unsolicited
- In good taste and won't harm our reputation
- Legal in the country of the provider and recipient
- Believed, in good faith, to comply with the gift policies of the recipient's employer

#### Gifts are NOT appropriate if they:

- Take the form of cash or cash equivalents (such as gift cards)
- Are exchanged by parties directly involved in an active or potential procurement process
- Could be intended to influence a business decision
- Are provided to a government official



### THE VERISIGN STORY

Verisign divested its authentication business to Symantec in 2010



## Business Entertainment

As part of your role at Verisign, you might offer or accept invitations to events with third parties or other forms of business entertainment. It's important to show the same level of care with business entertainment as you would with gifts.

Business entertainment is generally permissible if it meets the guidelines for gifts above and all of the following:

- The event is attended by both the provider and recipient – otherwise, it's a gift
- Business is discussed before, during, and/or after the activity
- It does not create a conflict of interest per our policy

Strict laws apply to our interactions with anyone who can be considered a government official. Help us maintain compliance with these laws by never providing anything of value, such as gifts or business entertainment, to a government official without first getting approval from the [Anti-Corruption Policy Point of Contact](#).

If you're offered a gift, meal, entertainment, or anything else of value that goes against our policies or even appears to be improper, politely decline it. If you do accept the gift, be sure to immediately let your manager and the Law Department know.

### ADDITIONAL RESOURCES:

[Avoiding Conflicts of Interest](#)

[Anti-Corruption Policy](#)

[Global Expense Reimbursement Policy](#)

[Global Travel and Related Entertainment Policy and Guidelines](#)

[Sourcing and Procurement Policy](#)

## Did You Know?

You are also responsible for gifts given to or by your immediate family members that could appear related to your employment with Verisign.



**Q. A VENDOR GAVE ME A SMALL PROMOTIONAL PEN WITH THEIR COMPANY LOGO ON IT AFTER A MEETING. CAN I ACCEPT IT?**

A. Yes, this type of gift is generally fine to accept. It's nominal in value and is promotional in nature.

## No Tolerance for Corruption

### What We Believe

Corruption not only undermines governments and harms communities, it can also erode the trust Verisign has earned from the public. We win business based on our merits alone and do not participate in, facilitate, or tolerate corruption of any kind. We also follow all anti-corruption laws that apply to our business and keep accurate records in order to verify our compliance.

### How We Work

Bribery involves offering a thing of value to improperly influence a business decision or gain an unfair business advantage. A number of laws exist around the world preventing acts of bribery and corruption. These laws prohibit offering, soliciting, giving, or receiving bribes. Bribes can take many forms, including:

- Cash
- Gifts
- Favors
- Loans
- Job offers
- Charitable contributions
- Awards of contracts

In addition, Verisign bans facilitation payments, which are small fees paid to government officials to speed up or smooth a routine government process. For example, offering something of value to obtain a business license, visa, or other routine government function. The term “government official” is broad and includes not only elected officials in the U.S. or other countries, but also anyone working for a government agency or state-owned or controlled organization. Always seek guidance from the Law Department before meeting with a government official.



### THE VERISIGN STORY

In 2010, Verisign moved our corporate headquarters from Mountain View, California to Northern Virginia and the following year moved into our current building in Reston, Virginia



Never engage in bribery or authorize someone to do so on our behalf, whether in the private or public sectors. The legal penalties for violating anti-corruption laws can be severe including fines and prosecution of individuals, so be sure to **speak up** if you ever have a question or concern.

We can also be held responsible for acts of bribery by third parties working on behalf of Verisign. This is why our procurement team conducts due diligence and monitors third parties to ensure they comply with contractual requirements and the law. Our monitoring process includes increased review of third parties in higher risk countries and the addition of compliance flow down requirements in our contracts.

## ADDITIONAL RESOURCES:

[Anti-Corruption Policy](#)

[Supplement to the Anti-Corruption Policy \(Written Communications with Govt. Officials\)](#)

[Supplier Code of Conduct](#)

## Did You Know?

In many countries, facilitation payments are legal and common practice. Verisign prohibits facilitation payments made on its behalf anywhere in the world, even if legal in the local jurisdiction. Verisign's ban applies to all employees in all locations because facilitation payments can lead to violations under the Foreign Corrupt Practices Act and are banned by the UK Bribery Act.



## Working with Governments as Customers

### What We Believe

Verisign helps governments around the world meet the needs of their people. We comply with all laws and requirements that apply to our work with governments and strive to be a good partner.

### How We Work

If your work involves working with the government, it is critical that you help ensure that we meet the unique requirements of government customers:

- **Understand the rules that apply to the procurement process.** Governments often place specific bidding, pricing, disclosure, and certification requirements on companies with whom they do business
- **Be aware that restrictions may apply when hiring government officials.** In certain cases, current and former government and military officials may be restricted from discussing or seeking employment with a company they work (or worked) with in their government role
- **Understand that Verisign employees who used to work for the government may have additional restrictions.** Certain former government officials and military officers who become Verisign employees may be restricted from selling to, or even contacting their former agency or military branch
- **Be mindful that false or misleading statements to the government are taken seriously.** We act with integrity in our dealings with all customers. False statements or claims knowingly made to government officials are treated as a serious crime

If you have questions about legal or regulatory requirements that may apply to your work with a government, seek guidance from the Law Department.

### ADDITIONAL RESOURCES:

[Anti-Corruption Policy](#)

[Sourcing and Procurement Policy](#)



### THE VERISIGN STORY

In 2012, Verisign passed 100 million .com domain name registrations



#### Q. A GOVERNMENT CLIENT I WORK WITH SENT AN EMAIL ASKING ABOUT AN OPEN POSITION AT VERISIGN. WHAT SHOULD I DO?

A. Check with the Law Department before responding because restrictions may apply when discussing employment opportunities with current and former government officials.



## Competing Fairly

### What We Believe

At Verisign we win business based on merit and we follow the letter and spirit of competition and antitrust laws everywhere we work.

### How We Work

Competition laws are designed to preserve a level playing field for businesses and prohibit companies from engaging in business practices that restrain trade. These laws are complex and vary around the world, but generally prohibit agreements between companies to:

- Fix sale or purchase prices
- Fix other terms or conditions of sale
- Coordinate bids
- Divide territory or customers
- Boycott a particular customer or supplier
- Not “poach” each other’s employees

Some competition laws govern how we deal with customers and suppliers. While these laws allow us to choose the companies with which we do business, those decisions must be made independent of, and never in agreement with, competitors.

Consequences for violating these laws can be severe and include fines and imprisonment. Be aware that even informal conversations can violate competition laws, so avoid discussing sensitive competitive matters or making agreements that limit competition.

Our commitment to competition laws also extends to our relationships with competitors. While we compete vigorously, we also do so ethically. We gather information about our competitors only through legitimate means and avoid even the appearance of impropriety.



### THE VERISIGN STORY

In 2016, the US Government completed the transition of core internet functions to ICANN, including Verisign’s role as Root Zone Maintainer



## Industry Associations

Industry associations bring competitors together, which can create situations where violations of antitrust and competition laws can occur. When attending any of these events, use good judgment and follow our policies and the law. If a conversation turns to a discussion about competitively sensitive matters, such as pricing strategies, end the discussion immediately, document what was said as well as your exit from the meeting, and contact the Law Department.

## ADDITIONAL RESOURCES:

[Fair Competition Policy](#)

[Sourcing and Procurement Policy](#)



**Q. I'M IN A MEETING WITH A COMPETITOR AND SOMEONE BEGINS DISCUSSING HOW WE SHOULD DIVIDE SALES TERRITORIES. MY JOB DOESN'T INVOLVE SALES, BUT I FEEL LIKE I SHOULDN'T BE DISCUSSING THIS WITH A COMPETITOR. WHAT SHOULD I DO?**

A. Trust your instincts. The participants are discussing competitively sensitive matters, so leave the meeting immediately, let those in the meeting know why you're leaving, and make sure that your reason for leaving and the fact that you left are recorded in any notes or meeting minutes being taken. After you leave, contact the Law Department right away.



# Complying with International Trade Regulations

## What We Believe

As a company that does business around the world, we understand and comply with applicable export controls and do not trade with prohibited countries, organizations, and individuals. We also respect anti-boycott laws and never participate in any boycott that is not approved or sanctioned by the U.S. government.

## How We Work

Export controls and economic sanctions, and other international trade regulations govern where and with whom we do business. They not only apply to physical transfers of technology, but also verbal or electronic transfers such as by phone and email. These laws are complex and the laws of more than one country may apply to a given transaction.

It's important to note that among other things, the laws governing international trade apply to international transfers of technology, including:

- Hardware
- Software
- Technical data

The consequences for violating international trade regulations can be severe and result in the loss of our export privileges. They can also lead to civil and criminal penalties.

We take our obligations under these laws very seriously. Not only do we comply with all export controls, economic sanctions, and embargoes, we also screen employee candidates and third parties such as our vendors against government watch lists to ensure we don't engage in business with anyone who is restricted or sanctioned under these laws.

Some international trade regulations also prohibit our Company from engaging in unlawful boycotts. If you receive a request to participate in a boycott, are asked about Verisign's position on a boycott, or learn that a third party we work with is participating in an unlawful boycott, inform the Law Department immediately.

## ADDITIONAL RESOURCES:

[Export Control Policy](#)



## Buying and Selling Stock

### What We Believe

We may have access to material, nonpublic information about Verisign and the companies we do business with that is not available to people outside Verisign. Trading in Verisign's securities or the securities of other companies we do business with while aware of this type of information is not only unethical, it's also illegal. We comply with all insider trading laws and work to protect inside information.

### How We Work

Insider trading involves buying or selling securities (including stock, bonds, or options such as puts or calls) of a company while aware of material, nonpublic information, also known as inside information, about the company. Certain types of transactions, such as ESPP purchases or transactions under a Rule 10b5-1 plan, are exceptions to this prohibition. Many types of information can be inside information, including information about:

- Financial results and projections
- Significant cybersecurity incidents such as data breaches
- Changes in the pricing or costs of products or services
- Changes in senior management
- New products
- Pending or proposed acquisitions or divestitures

We all will likely have access to inside information at some point during our career at Verisign. Never buy or sell securities based on or with the knowledge of inside information. In addition, sharing inside information with someone who may trade on such information, also known as "tipping," is prohibited under our [Insider Trading Policy](#) and the law. Verisign policies and insider trading laws also prohibit the selective disclosure of material nonpublic information to investors (analysts, institutional investors, etc.) before disclosing the information to the public.

If you're ever unsure about your responsibilities under our Insider Trading Policy or insider trading laws or have questions about trading in Verisign's securities or the securities of other companies we do business with, contact the Law Department.

### ADDITIONAL RESOURCES:

[Insider Trading Policy](#)



### THE VERISIGN STORY

Verisign's initial public offering (IPO) took place in 1998 at an IPO price per share of \$14.00



### Q. WHEN IS INFORMATION ABOUT A COMPANY CONSIDERED MATERIAL AND NONPUBLIC?

A. When it is something that has not been publicly disclosed by the company and, if publicly disclosed, could be expected to have a positive or negative effect on the market price of the company's securities. For more detail about material nonpublic information please see our [Insider Trading Policy](#).



# WE INVEST IN OUR COMMUNITIES

## Making a Difference in Our Communities

### What We Believe

We work to make a positive and lasting difference to the global internet community as well as the communities where we live and work. We do this through our Verisign Cares Program and our partnerships with organizations that help combat illegal activity and make the internet safer for everyone.

### How We Work

At Verisign, we make giving back a priority. Our [Verisign Cares Program](#), gives us the opportunity to support the causes that you and the Company care about the most through:

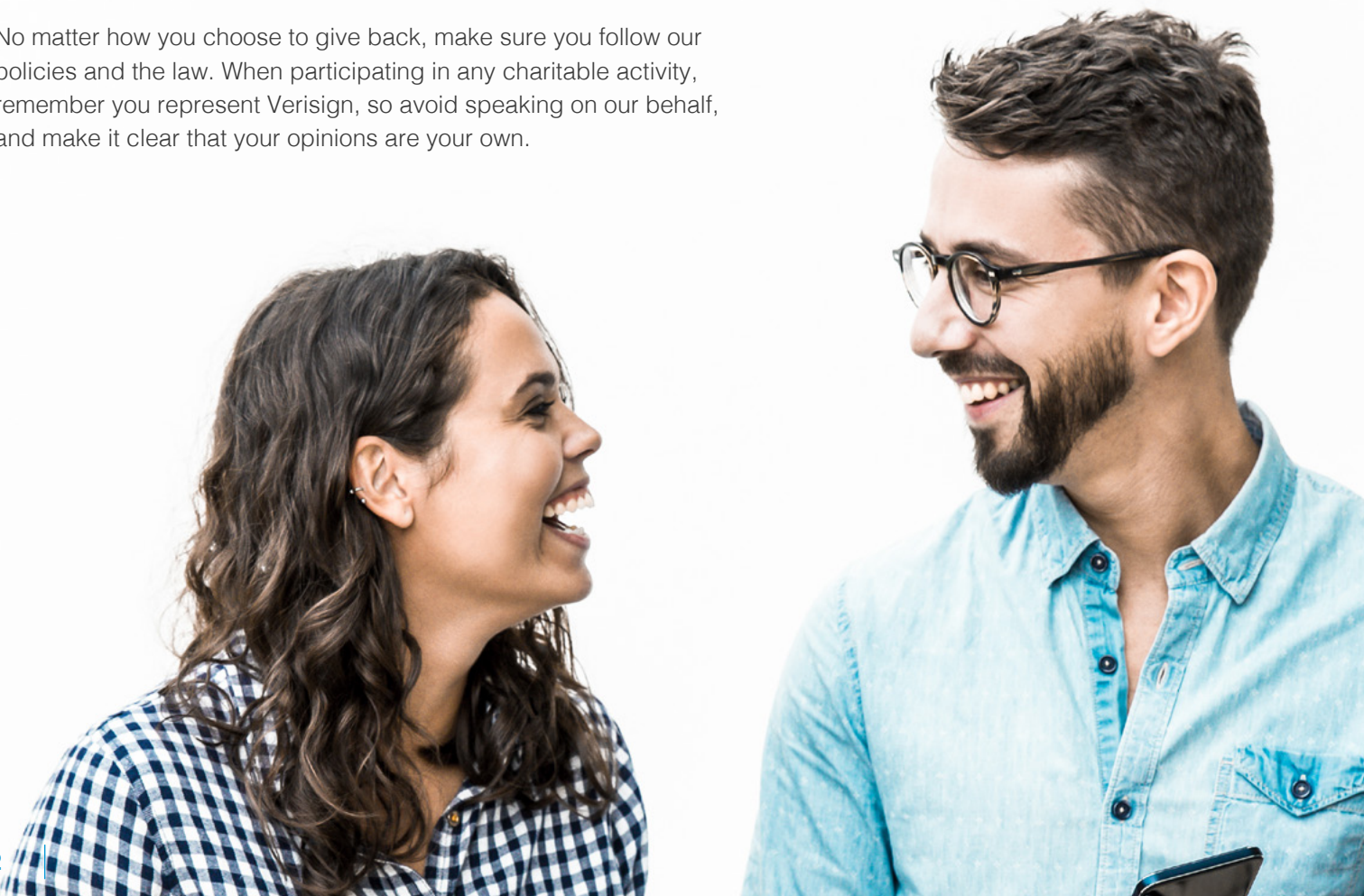
- **Corporate giving.** Our corporate charitable giving supports organizations that help communities around the globe
- **Matching gifts.** We also encourage employees to donate to the causes that matter most to them. To show our support, we match all employee contributions up to \$3,000 per employee per year
- **Volunteering.** Through the Verisign Volunteer Program, employees have the opportunity to volunteer one day per quarter at a local community organization

No matter how you choose to give back, make sure you follow our policies and the law. When participating in any charitable activity, remember you represent Verisign, so avoid speaking on our behalf, and make it clear that your opinions are your own.

### ADDITIONAL RESOURCES:

[Verisign Cares Program](#)

[Global Expense Reimbursement Policy](#)



## Protecting the Environment

### What We Believe

We're committed to protecting the environment for future generations. We work to do business in an environmentally-friendly manner and comply with all environmental laws and regulations.

### How We Work

We want to do all we can to reduce our carbon footprint. That's why we take action to incorporate environmentally friendly practices throughout our business.

Some of our current areas of focus include:

- Recycling
- Using earth-friendly products
- Reducing energy consumption
- Engaging in environmentally-friendly construction practices

We depend on you to help us protect the environment by taking action, conserving natural resources, and always looking for ways to improve the efficiency of our operations. For more information, visit our [Green Business Initiatives](#) page.

### ADDITIONAL RESOURCES:

[Green Business Initiatives](#)



### THE VERISIGN STORY

Verisign entered into Amendment 35 to the Cooperative Agreement in 2018, lessening the regulatory oversight of the .com registry



#### Q. WHAT IF I HAVE AN IDEA ABOUT HOW WE CAN IMPROVE OUR OPERATIONS TO LESSEN ENVIRONMENTAL IMPACT?

A. You should share it with your manager. We welcome any ideas about how we can improve our business practices.



## Participating in Political Activities

### What We Believe

One of the most fundamental rights we have is the right to participate in the political process. We respect the rights of all of our employees to engage in political activities.

### How We Work

If you choose to engage in political activities, make sure those activities are separate from your work at Verisign. With the exception of taking time to vote, do not use Verisign time, assets, or technology for personal political activities. Our Company is prohibited from making contributions to federal candidates, so we abide by those restrictions and never reimburse employees for making a campaign contribution.

As a Company, we engage in political activities that are focused on supporting laws and regulations that further our mission. If your work involves lobbying on our behalf, be sure to follow all applicable disclosure rules and contact the Law Department if you have any questions about whether disclosure or other rules apply.

### Did You Know?

When engaging in political activities unrelated to your job duties, make sure people know that your opinions are your own and not those of Verisign.



### Q. CAN I GO TO POLITICAL FUNDRAISERS OUTSIDE OF WORK?

A. It's fine if you engage in political activities on your own time, with your own funds and resources. Just make sure you comply with the law and our policies.

### Waivers

Waivers of the Code will be granted only in exceptional circumstances. If you believe that a situation may warrant a waiver, contact the Compliance Officer. Any waivers of provisions of the Code for officers or directors of Verisign must be approved by the Board of Directors and will be disclosed in accordance with applicable law.



### THE VERISIGN STORY

In 2020, Verisign passed 150 million .com domain name registrations





**VERISIGN®**

# **CODE OF CONDUCT**

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**POWERED BY**

**OUR**

**VALUES**

**Verisign.com**

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Verisign Public

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