



Code of Conduct

POWERED *by our* **VALUES**

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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,

As stewards of the internet, we understand the importance of our work and executing on our mission with the highest degree of integrity, accountability, and transparency. Our Code of Conduct embodies the core values and principles that define who we are as an organization and how we aspire to operate every day. It is a crucial element in ensuring that our work not only meets the highest standards of professionalism but also adheres to the ethical commitments we have set for ourselves.

Our Code sets the expectation for how we will conduct ourselves in relation to Verisign, each other, and our external stakeholders. By being part of the Verisign community, you agree to abide by all applicable laws, this Code, and Verisign's policies in all aspects of your daily work. Adherence to the Code, and its consistent and fair enforcement, is essential to our reputation and success, and it is the responsibility of everyone, regardless of position or geographic location, to read and understand it.

This Code applies to every employee, including all officers and directors. The Code will not address every situation. If you have any questions about whether you or anyone else's actions are consistent with the Code, reach out to your manager or any other Verisign resource identified in the Code.

Each of us plays a critical role in upholding Verisign's values, ensuring that all of our business practices align with those values, and fostering a safe and ethical workplace. To deliver on our mission for the billions of internet users around the world, for our people, and for our stakeholders, it takes each of us doing our part, holding ourselves to a higher standard. Together, let's continue to demonstrate our shared commitment to ethical conduct as we live our mission and values every day.

Thank you for your dedication and commitment to our Code, values, and mission.

A handwritten signature in black ink that reads "Jim Bidzos". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jim Bidzos
Chairman of the Board of Directors, Executive Chairman,
President and Chief Executive Officer
Verisign

“

Our Code of Conduct embodies the core values and principles that define who we are as an organization and how we aspire to operate every day.

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 remind us of our aspirations. 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 empower every member of the Verisign community to strive to do the right thing.

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 reflect our values and the high standards we set for ourselves – even when it's not easy to do.

Our Code of Conduct 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 align with the requirements of our Code.

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



Our Mission

connect
**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 STRATEGIC FRAMEWORK

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. If our values guide and inspire us, our strategic framework is how we apply our values to make good business decisions. Every year, we develop corporate goals that support this strategic framework. In turn, those goals, along with our mission and values, guide our day-to-day operations and individual actions.



The **VERISIGN STORY**

Verisign was incorporated
on April 12, 1995.

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, even if it's not the easy thing.

Our success depends on you. One poor decision can damage our reputation and the culture of integrity 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 of Conduct, and policies.

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, talk to your manager, Human Resources, another Verisign leader, or contact the Verisign Ethics Helpline. If asked to participate in an investigation, be sure to respond to any requests promptly, and provide complete and accurate information.

Leaders at Verisign have even greater responsibilities and expectations placed upon them. If you manage others, you set the tone for your teams, and it is important that you model the following behaviors in addition to your responsibilities as an employee:

- **Lead with integrity.** Exemplify ethical behavior and inspire others to do the same.
- **Foster an ethical culture.** Be deliberate about talking with your team about our mission, values, our Code of Conduct, and policies. Highlight examples of actions that bring our mission and values to life and ensure your team knows to speak up if they have a concern.
- **Listen.** Keep an open door and make sure your team is heard – and feels heard – if they come to you with concerns. Give sound advice and help them make good decisions.
- **Create a respectful and inclusive workplace.** Create an environment where everyone on your team can contribute, feels valued, and has access to the tools, resources, and information needed to succeed.

- **Provide help.** There will be times when people won't know the right answer – and that's OK. Create an environment where it is OK to ask for help and escalate concerns. Be a trusted resource if a coworker asks for help on a compliance concern. Go up the chain if you need help too.
- **Protect against retaliation.** Know what retaliation means and never tolerate it in any form. Always report any retaliation to HR immediately. Take positive action to prevent retaliation against others.

The **VERISIGN STORY**

Because of dedicated employees like you, Verisign has maintained 100% uptime for the .com and .net DNS for more than 27 years.

SPEAKING UP

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 that 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, including anonymously by using our third-party managed Ethics Helpline. 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 the Law Department or Information Security
- The Ethics Helpline:
 - Online: VerisignEthicsHelpline.com
 - 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

Retaliation means any adverse action against an employee for speaking up, whether it's a negative performance review, reduced assignments, or ignoring the employee. 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 engaged in retaliatory conduct will be subject to disciplinary action, including termination.

INVESTIGATIONS

We take reports of suspected violations of the law, our Code of Conduct, and our policies seriously. We have a defined process to review each report and a cross-functional investigations team that evaluates each report and assigns team members to investigate, if needed.

Investigations are performed by trained, objective individuals, and are guided by rigorous protocols that help ensure we reach sound conclusions. Once complete, members of Verisign's leadership decide how to proceed given the facts and recommendations provided by the investigations team. Certain cases may also be reviewed by the Board of Directors.



In most instances, we cannot update employees on the detailed outcomes of investigations in order to protect the privacy of everyone involved. However, our procedures typically call for the person who made the report to be notified when the investigation is complete.

+ ***Additional Resources:***

Harassment, Discrimination, and Retaliation Prevention Policy

Did You
KNOW?

When reporting a concern, your manager or HR are good places to start. Another Verisign leader or the Ethics Helpline are also options. 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 that is provided by the vendor so reporters can check on the status of their report or provide additional information if needed.

Q & A

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?

If you don't feel comfortable addressing the issue directly with your manager, you should raise your concern to HR or another Verisign leader. If you do not feel comfortable identifying yourself, you can raise your concern anonymously through the Ethics 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 to HR or through the Ethics Helpline. We will investigate any concern you raise and take appropriate action.

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, values, and strategic framework?
- Is it compliant with the law, our Code of Conduct, and our policies?
- Would you feel comfortable if it were in the news?
- Would you want it to happen to you?



The **VERISIGN STORY**

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

Q & A

Should I report a concern even if I am not sure something is wrong?

Yes. As long you are raising your concern in good faith, meaning you have an honest concern that something may not be 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.

We Respect Others

MAINTAINING A RESPECTFUL AND SAFE WORKPLACE

What We Believe

Our workforce consists of people with many different backgrounds, experiences, and perspectives where people are treated with fairness and respect. This is a key component to our success as it allows us to attract and retain talented individuals. We work to foster an inclusive workplace where everyone feels safe, valued and respected. We do not tolerate harassment, discrimination, or bullying in any form and always do our part to maintain a respectful workplace.

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 characteristics that are unrelated to one’s ability to do the job such as race, color, religious creed, or gender.

We create a talented and diverse workplace by ensuring employees are treated with respect and compassion which is why we don’t tolerate discrimination, harassment, or bullying anywhere in our business. Discrimination means treating someone differently based on protected characteristics such as race, color, religious creed, or gender.

Q & A

On a video call, a coworker said the poster in my background was offensive. I don’t need to take the poster down, right?

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 images that may be unnecessarily provocative while on work video calls. Another alternative is to contact your Human Resources Business Partner to seek guidance on the situation.

Did You KNOW?

Our Code of Conduct and our policies, including our Harassment, Discrimination, and Retaliation Prevention Policy, apply even at off-hour or off-site business events, such as holiday parties or business travel and entertainment.

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. A respectful and safe workplace is also one that's free from harassment. 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

In addition to maintaining a respectful and safe environment at our workplaces, we also work to maintain a respectful and safe environment at external events sponsored by Verisign. We maintain a Verisign Events Standard of Conduct which sets expectations for behavior and applies to all attendees at Verisign sponsored events.

Workplace Safety & Security

Just as 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 in our workplaces.

Examples of workplace violence include:

- Hitting or shoving
- Aggressive or hostile behavior – physical and verbal

The

VERISIGN STORY

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



- Stalking – physical and cyber-stalking
- Physical acts that are related to sexual harassment or domestic violence
- Actions which damage, destroy, or sabotage property

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

Weapons of any kind are not permitted anywhere on our property, including vehicles in our parking areas, outside of law enforcement personnel and authorized outside contractors providing security services. If you suspect that an unauthorized person has a weapon in our workplace, it's important that you report it immediately to the 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.

Did You **KNOW?**

Protected characteristics also include traits historically associated with race, including hair texture, hair type, and protective hair styles, 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. We do not make employment decisions such as pay, promotion, hiring, or discipline based on these characteristics.

ALCOHOL AND DRUG-FREE WORKPLACE

Part of our commitment to ensuring a safe 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 possession, or use, of an illegal drug, or intoxicant during working hours, while on premises owned or occupied by Verisign, or while conducting business on behalf of Verisign at any other location.

While we prohibit working under the influence of alcohol, we understand there are situations when employees may choose to consume alcohol responsibly. 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.

+ *Additional Resources:*

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

[Standards of Conduct](#)

[Physical Security Policy](#)

[Policy Against Workplace Violence](#)

[Alcohol and Drug-Free Workplace Policy](#)

[Background Investigations Policy](#)

[Equal Employment Opportunity Policy](#)

[Verisign Events Standard of Conduct](#)



I want to host an offsite event with my team. Can alcohol be served at the event?

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 ELT member.

RESPECTING HUMAN RIGHTS

What We Believe

We're committed to respecting internationally recognized human rights and complying with applicable global laws and regulations including laws against human trafficking, forced labor, and unlawful child labor. We do not tolerate human rights abuses by our employees or those in our chain of business activities.

How We Work

In conducting our business, respecting human rights means ensuring we do not violate those rights and ensuring that our suppliers, customers, and others with whom we do business are not violating them as well. We review all business transactions with this in mind and hold our suppliers to this standard through our Supplier Code of Conduct. We expect you to help uphold our commitment to human rights by complying with employment and human rights laws and by speaking up if you learn that any company or individual we work with violates these laws or engages in human rights abuses.

If you suspect anyone we work with is engaging in any activity that goes against our commitment to human rights, raise your concern to your manager, Human Resources, and Ethics and Compliance.



Additional Resources:

[Supplier Code of Conduct](#)



The **VERISIGN STORY**

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

We Protect Our Company and Business

KEEPING TECHNOLOGY AND INFORMATION SECURE

What We Believe

Technology and 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, phones, and public cloud infrastructure. If our technology is misused or our policies 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, relevant standards, and internal controls.** Our Information Security Policy, relevant standards, and internal controls help keep our network, systems, and devices secure.
- **Using only approved technology for business.** Use only Verisign-approved devices and technology for conducting business. When conducting Verisign business, never use your own personal device or an unapproved device or technology without permission.



- **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. 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 or 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 monitoring the use of our systems or blocking dangerous, offensive, illegal, and non-business-related sites or internet services.
- **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 text, or provide Verisign information to someone you don't know, even if they say they work for Verisign. Report suspected phishing to Information Security.
- **Seeking guidance and approval for the use of Artificial Intelligence (AI).** Always seek guidance and approval from the AI Steering Committee, Information Security, and the Law Department before undertaking any project or initiative that has an AI component, including third-party products and services.



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

+ *Additional Resources:*

**Information Security Policy and
Relevant Standards**

Data Protection Policy

**Technology Asset Management
Standard**



Verisign sensitive information may not be placed on, or moved to, personal storage devices or cloud providers without prior approval by Information Security, and always label and classify data in emails, computers, documents, or other Verisign assets according to our policies and relevant standards covering data classification and handling. Your responsibility to protect 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.

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 sensitive information. Examples include phishing and impersonation of a Verisign employee.

Q & A

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?

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 report the email via the appropriate reporting mechanism based on the device you are using. The Phishing Response Team will then confirm if the email is legitimate and safe to proceed.

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 and according to applicable laws and regulations.

How We Work

Personal Information (PI) refers to any information that could be used to identify someone, such as an individual's name, location, contact information, Internet Protocol (IP) address, government identification number(s), gender, or date of birth. PI includes information about an individual, such as educational background, web browsing or online purchase history, interests and hobbies, or the identity of an individual's friends and associates. PI includes any other data that describes the physical, genetic, cultural, or social identity of an individual. It also includes information that, 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 and protection 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
- Report any privacy concerns to your manager, our Global Privacy Officer, or Information Security



Additional Resources:

[Personal Information Privacy Policy](#)

[Privacy Management Policy](#)

[EU/Swiss-U.S. Data Privacy Framework:
Employee Privacy Policy](#)

Q & A

I have an idea for a new product that will involve the collection and use of customer personal information. How do I make sure my product design complies with privacy laws?

If you have any questions regarding applicable laws related to Verisign's collection and use of customer (or employee) personal information, please consult the [Global Privacy Officer](#).

SAFEGUARDING OUR ASSETS

What We Believe

We use and protect our assets and those entrusted to us properly, which is how we continue to deliver on our mission to enable the world to connect. We are good stewards 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 which includes but is not limited to software code, architectural diagrams, and notes and trade secrets related to our technology infrastructure
- **Our reputation** – how people perceive Verisign and our image and brand



You are responsible for taking care of our assets by:

- Protecting physical, financial, information, and technology assets from theft, fraud, waste, misuse, or damage
- Obtaining all appropriate reviews and approvals before entering into any transactions or commitments on behalf of Verisign
- Labeling and classify data in emails, computers, documents, or other Verisign assets according to our policies covering data classification and handling

Intellectual Property

Intellectual property is among our most important assets and includes our technology, information, copyrights, patents, trade secrets, code, architectural diagrams, 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. Remember that any work products, including proprietary code that you create as an employee of Verisign are property of Verisign, must be protected in line with our policies, and cannot be taken if you leave Verisign.

You should also respect the intellectual property rights and sensitive 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 sensitive information, and you are unsure about whether you or Verisign is authorized to have or use it, please contact the Law Department.



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.

Financial and other disclosures that Verisign makes externally must be complete, accurate, and free from misleading statements. Each day, we generate information that feeds into Verisign's financial records, and therefore, everyone has a role in ensuring that this information is reliable. Every piece of data or information that is submitted – including things like expense reports, purchase orders, invoices, or payroll records – becomes part of Verisign's records and therefore must be honest, accurate and complete.

The

VERISIGN STORY

In 2006, Verisign passed 50 million .com domain name registrations.

Practice good record management:

- Record transactions accurately and maintain financial records in accordance with Verisign's policies and relevant accounting standards
- Follow all laws, external accounting requirements, and company procedures for reporting financial information
- Observe our internal controls, such as segregation of duties and the proper documentation of approvals as applicable
- Cooperate with our internal and external auditors
- 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"
- Be alert to and report suspicious, false, or misleading transactions to the Law Department



+ Additional Resources:

[Facilities Use Policy](#)

[Technology Asset Management Standard](#)

[Information Security Policy and Relevant Standards](#)

[Data Protection Policy](#)

[Records Retention Policy](#)

[Legal Hold Policy and Procedures](#)

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

[Sourcing and Procurement Policy](#)

[Risk-Based Approval Policy](#)

[Patent Program Procedures](#)

[Authority for Entering into Company Commitments](#)

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 Verisign technology is okay, provided it does not decrease your productivity, compromise security, cause Verisign additional costs, or violate any Verisign policies, standards, or applicable laws. Also, never transfer Verisign information to, or store it on personal devices.

Q & A

I am working at home and need to print a Verisign sensitive document I have been working on. Can I upload the document to my own cloud service in order to print it on my personal printer?

No. Verisign information is an asset and must only be created, processed, printed, and stored on Verisign networks and devices.

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 the Company's behalf.

How We Work

Help us protect our reputation and ensure that our external stakeholders have accurate information about our Company:

- Don't speak on the Company's behalf unless you are an authorized spokesperson or have written permission to do so
- Requests from the media must be forwarded to the Strategic Communications Department
- Requests for information from investors and financial research analysts must be forwarded to the Investor Relations Department



Additional Resources:

Social Media and Internet Posting Policy

Q & A

I have been invited to participate on a panel related to my work at Verisign. Can I accept the invitation?

Not without prior approval. Employees must receive permission from their ELT member prior to accepting any external speaking opportunity related to Verisign. Their ELT member may seek additional approvals prior to approving. Any materials for any external speaking event must be reviewed by the External Content Review Board and the Law Department. And anyone speaking externally on behalf of Verisign must complete training by the Law Department and the Strategic Communications Department.

USING SOCIAL MEDIA

What We Believe

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

How We Work

While we recognize that many employees use social media for personal use, it's important that you are 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.



Additional Resources:

Social Media and Internet Posting Policy

Standards of Conduct



When using social media to post content related to Verisign:

- Be transparent about your connection to Verisign
- Be truthful and ethical
- Do not disclose confidential or non-public information
- Do not use Verisign marks without authorization and respect copyrights, trademarks, and intellectual property
- Follow the law
- Do not respond to inquiries about Verisign on behalf of our Company and forward them to the Strategic Communications Department for review

Remember that anything you say or engage with on social media, including under an alias or in a seemingly private forum, could become public and be attributed to you.



Q & A

Can I share that I work at Verisign on social media?

Yes. There's nothing wrong with letting people know that you work for Verisign – just be sure to follow our policies, including the Social Media and Internet Posting Policy, 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. We therefore 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
- Significant financial interests in a company that is a current or potential supplier, reseller, customer, or competitor of Verisign
- Gifts and entertainment offered to or from 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

Did You
KNOW?

If a situation presents a conflict of interest, you cannot avoid it by using another person to do something that you cannot do yourself. For example, if you are unable to accept a gift, then it would not be appropriate for the gift to be given to your family member instead.

Conflict of interest situations can be difficult to assess. As a result, you should seek assistance from your manager and from Ethics and Compliance whenever an actual, potential, or perceived conflict of interest arises. If a potential conflict of interest cannot be avoided altogether, you must notify and obtain authorization from your manager and Ethics and Compliance before proceeding.

+ Additional Resources:

[Avoiding Conflicts of Interest Policy](#)

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

[Global Expense Reimbursement Policy](#)

[Anti-Corruption Policy](#)

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

Did You KNOW?

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

Q & A

I have become very close friends with the CEO of one of our suppliers. What should I do?

You must disclose this relationship to your manager and to Ethics and Compliance. In most instances, you will not be able to be involved in any decisions involving Verisign and your friend's company.

EXCHANGING GIFTS AND ENTERTAINMENT

What We Believe

Exchanging gifts and entertainment can be a normal part of doing business, but if you're not careful, they can create an obligation or be perceived as a conflict of interest or 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 may be 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 or loans)
- Are exchanged by parties directly involved in an active or potential procurement process
- Are intended to improperly influence a decision or obtain business
- Are provided to a government official without prior authorization from the Anti-Corruption Policy point of contact

Business Entertainment

As part of your role at Verisign, you might be invited to events with third parties or offered 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 can be 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, our gift rules apply
- Business is discussed before, during, or after the activity
- The venue where the entertainment takes place is tasteful and befitting of our corporate image and values
- It does not create a conflict of interest or perceived conflict of interest per our Avoiding Conflicts of Interest Policy



The **VERISIGN STORY**

Verisign sold its authentication business to Symantec in 2010.

Before you accept or offer a gift or business entertainment, you must obtain your ELT member's approval if it has more than a nominal value. 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.

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.

+ ***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](#)

Q & A

A vendor gave me an inexpensive gift bag with their company logo on it after a meeting. Can I accept it?

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

I was offered an expensive free trip to a vendor conference. May I accept the offer?

Before considering the offer, you must obtain your ELT member's approval and seek guidance from the Ethics and Compliance team. This process is required for any expensive gift or entertainment, including lavish dinners and golf outings where the vendor is paying the cost.

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 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 prohibiting acts of bribery and corruption. These laws prohibit offering, soliciting, giving, or receiving bribes. Bribes can take many forms, including things like:

- Cash
- Gifts, travel, and entertainment
- Favors
- Promises
- Loans
- Job offers
- Charitable contributions
- Corporate sponsorships
- Awards of contracts
- Confidential information to which the recipient is not entitled



In addition, Verisign bans what are sometimes called “facilitation payments,” which are small fees, gifts, or favors of any amount paid or given to government officials to speed up or smooth a routine government process (for example, offering something of value to a government official to obtain a business license, visa, or other routine government function).

Keep in mind that the term “government official” is broad and includes any person acting in an official capacity on behalf of a:

- Local or national government
- Government department or agency
- Commercial enterprise owned or controlled by a government
- Public international organizations, such as the United Nations, World Bank or International Monetary Fund

Sometimes this can include less obvious individuals, such as family members of government officials, members of a royal family, military personnel, healthcare workers and university professors. Always seek guidance from the Law Department before meeting with a government official. As a good practice, there should be at least two Verisign representatives in any meeting with a government official whenever possible.



Never engage in bribery or authorize someone to do so on our behalf, whether the bribery is to a government official or a private person. The legal penalties for violating anti-corruption laws can be severe, including fines and criminal 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 acting 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

The **VERISIGN STORY**

In 2011, Verisign moved our corporate headquarters to its current location in Reston, Virginia.



WORKING WITH GOVERNMENTS

What We Believe

Verisign works with governments in the United States and around the world, and is committed to complying with all laws and requirements that apply to our work with governments.

How We Work

It is critical that you help ensure that we follow the unique requirements of work that involves interfacing with government officials:

- Keep in mind that lobbying rules can apply when Verisign employees or those acting on our behalf interact with government officials. If an activity could be considered lobbying, it may need to be documented and disclosed.
- 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 Verisign if they work (or worked) with us in their government role.

The background of the lower half of the page features a photograph of classical stone columns, likely from a government building, with a white rectangular box overlaid in the center containing text.

The **VERISIGN STORY**

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

- Understand that Verisign employees who used to work for the government may have additional restrictions to follow, even after leaving government service, such as being restricted from selling to, or even contacting their former agency or military branch.
- Be mindful that knowingly making false or misleading statements to government officials are taken very seriously and can be 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

Q & A

A government official I know sent an email asking about an open position at Verisign. What should I do?

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 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 unfairly restrain trade. These laws are complex and vary around the world, but generally prohibit agreements between companies to:

- Fix prices
- Fix other terms or conditions of sale
- Coordinate bids on contracts
- Divide territory or customers
- Boycott a particular customer or supplier

The **VERISIGN STORY**

In 2016, the U.S. government completed the transition of core internet functions to ICANN, and Verisign remained in the Root Zone Maintainer role on behalf of ICANN.



We must also not engage in unfair or deceptive methods of competition acts ourselves, including:

- Making false or unfounded statements about our products and services
- Making false or unfounded statements about our competitors' products and services
- Disparaging our competitors or their business practices
- Attempting to induce third parties to violate non-disclosure agreements to obtain non-public information about competitors or the marketplace
- Misrepresenting our identity or affiliation with Verisign when authorized to collect information about competitors
- Obtaining information about competitors through theft, bribery, or any other violation of the law, the Code of Conduct, or Verisign's policies and values

Be aware that even informal conversations can violate competition laws, so avoid discussing sensitive competitive matters with third parties.



Industry Associations

Industry associations bring competitors together. While the purposes of industry associations generally are proper and serve legitimate goals, competitors being together at industry associations can create situations where violations of antitrust and competition laws, or even the appearance of violations, 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, document your exit from the meeting, and contact the Law Department promptly.



Additional Resources:

[Fair Competition Policy](#)

[Sourcing and Procurement Policy](#)

Q & A

I'm in an industry meeting with competitors and one of them begins discussing pricing strategies. I feel like I shouldn't be discussing this with a competitor. What should I do?

Your instincts are right. The participants are industry competitors, and they are discussing competitively sensitive matters, so leave the meeting immediately, announce to those in the meeting 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.

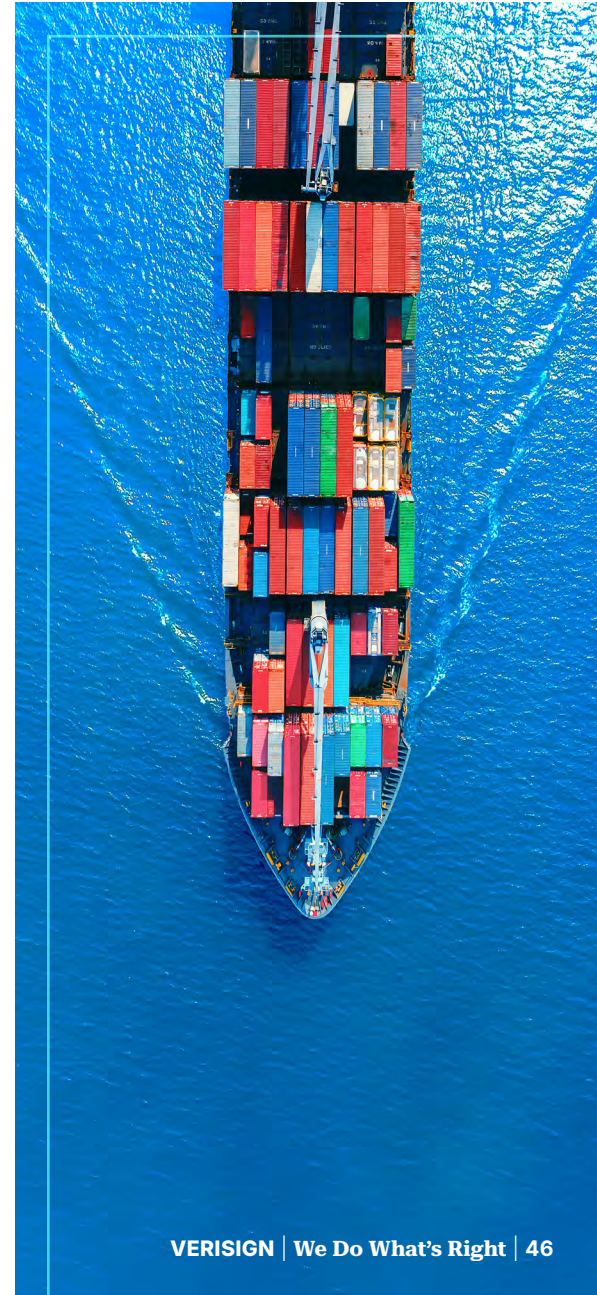
How We Work

Export controls and economic sanctions, along with other international trade regulations, govern where and with whom we can do business. 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

They not only apply to physical transfers of technology, but also verbal or electronic transfers, such as by phone and email.



In addition to complying 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 a restricted or sanctioned party.

Some international trade regulations also prohibit our Company from engaging in boycotts that are not sanctioned by the U.S. government. 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:*

Fair Competition Policy

Sourcing and Procurement Policy



BUYING AND SELLING STOCK

What We Believe

We may have access to material non-public 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 material non-public information.

How We Work

Insider trading involves buying or selling securities (including stocks, bonds, or options such as puts or calls) of a company while aware of material non-public information about the company. Certain types of transactions, such as Employee Stock Purchase Program purchases or transactions under a Rule 10b5-1 plan, are exceptions to this prohibition.

Many types of information can be material non-public 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



Sharing material non-public 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 non-public information to investors (analysts, institutional investors, etc.) before disclosing the information to the public.



The

VERISIGN STORY

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

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](#)



Q & A

I overheard my manager talking about our financial results this quarter. I haven't been restricted from trading before but I know our earnings call isn't for a few days. Can I trade in Verisign stock?

No. If you are aware of material non-public information, even by overhearing it, you are prohibited from trading in Verisign's stock.

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 activities like our Verisign Cares Program and through 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 qualifying employee contributions up to \$3,000 per employee per year.
- **Volunteering.** Through the Verisign Volunteer Program, employees have the opportunity to dedicate up to one day per quarter to volunteer activities.



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 and act accordingly.

+ Additional Resources:

[Verisign Cares Program](#)

[Global Expense Reimbursement Policy](#)



Q & A

Can I support a charity by getting matching funds or taking time to volunteer?

Yes. Verisign matches employee donations, up to the equivalent of \$3,000 USD per year, to non-profits that qualify for matching. In addition, Verisign also provides employees eight paid hours per quarter, with manager approval, for volunteer activities.

CORPORATE STEWARDSHIP AND RESPONSIBILITY

What We Believe

Stewardship is at the core of our mission and values. Just as we serve as stewards of the internet and our business – upon which billions of internet users depend – we are also committed to our people and to the communities where we live and work.

How We Work

As an internet infrastructure provider, Verisign's operations have a significantly smaller environmental impact than other businesses in sectors such as energy, mining, and transportation. Nevertheless, we recognize the importance of managing the impact we do have. In our data centers, we seek to lessen our environmental impact by implementing more energy-efficient processes and seeking energy from renewable sources.



Additional Resources:

[Corporate Stewardship and Responsibility](#)



PARTICIPATING IN POLITICAL ACTIVITIES

What We Believe

One of the most fundamental individual rights we have is the right to participate in the political process. We respect the rights of all of our employees to engage in personal 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 political activities. In addition, employees cannot be reimbursed for making personal political contributions.

Our Political Contributions Policy prohibits contributions by the Company to political candidates or campaigns using Verisign funds or resources, whether monetary or in-kind contributions.



Because some trade associations or industry organizations may make political contributions with membership dues and other fees, you must follow the Political Contributions Policy before making any payments to trade associations or industry organizations. Contact the Law Department if you have questions about political contributions or activities on behalf of the Company.

+ Additional Resources:

[Political Contributions Policy](#)

The **VERISIGN STORY**

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

Q & A

Can I go to political fundraisers outside of work?

It's fine if you engage in political activities on your own time, on your own behalf, and 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.



Code of Conduct

POWERED *by our* **VALUES**