

SimpliSafe

SimpliRight Code of Conduct

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A message from Christian Cerda, SimpliSafe CEO

At SimpliSafe, our mission is to keep every home secure. Our customers trust us with the safety and security of their homes, and we take this responsibility very seriously. We must do the right thing day-in, and day-out. That's why we are rolling out our new Code of Conduct known as SimpliRight.

Upholding this level of trust is crucial to our mission and our success - with customers, our partners, and with all of you. At its core, we must act with integrity and ethics in all that we do. We must all do the right thing because it is the right thing to do.

Simply put, our code is **SimpliRight** and includes seven principles that help ensure we are doing our jobs the right way. These principles are that we (1) champion our company values, (2) know and obey the law, (3) conduct our business with integrity, (4) treat people with dignity and respect, (5) safeguard company assets and interests, (6) be a responsible member of our global community, and (7) know when and how to speak up if we see something wrong.



A message from Christian Cerda, continued

SimpliRight applies to everyone (directors, officers, employees, and consultants or contractors) working at or for SimpliSafe or any SimpliSafe-owned or controlled affiliate globally. It is your responsibility to read, understand and comply with our SimpliRight Code. We rely on you to uphold our core values and conduct our business honestly, fairly, and with integrity.

Please review our SimpliRight Code and discuss any questions with your manager, the People Team, or Legal. Reach out if you have any questions or are in doubt about the correct course of action.

Thank you for your leadership and ensuring we continue our mission of making every home secure the SimpliRight way!

Sincerely,

Christian



SimpliRight Seven Core Principles

SimpliRight Code of Conduct

VALUES

Champion our values

(slides 5-6)

LAW

Know and obey the law

(slides 7-8)

INTEGRITY

Conduct business
with integrity

(slide 9-14)

RESPECT

Treat people with dignity
and respect

(slides 15-16)

STEWARD

Safeguard company
assets and interests

(slide 17-21)

DO GOOD

Be a responsible member
of our global community

(slide 22-23)

ACT

Speak up if you see something wrong

(slide 24-26)

VALUES: Champion our values

At SimpliSafe, our values help define who we aspire to be. These values ensure we're focused on the right priorities in our day-to-day work. Our SimpliRight Code provides core principles for how we conduct ourselves as we work together to advance our mission of every home secure.



We're **customer-obsessed**



We **aim high**



We have **no ego**



We're **one team**



We **lift as we climb**

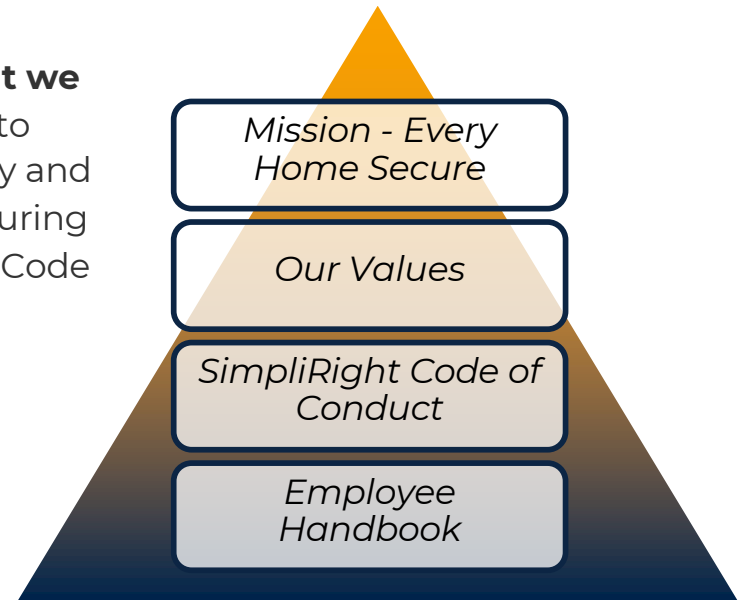
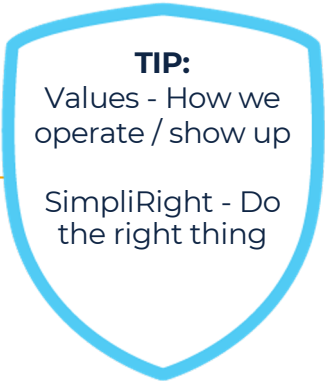


We're **lean and nimble**

VALUES continued

Our customers rely on us to keep their homes and loved ones safe and secure. They trust that our products, services, and people will be there when an emergency happens, and that our innovations are offered at an honest and fair price. This trust builds loyalty, which is key to our success.

Key stakeholders, external parties, and regulators also expect that we operate and behave in a consistent manner and that we continue to reinvent the home security industry with the highest level of integrity and character. Trust is the foundation for success in our industry and ensuring we individually and collectively uphold our company values and this Code protects the company, our customers and stakeholders.



LAW: Understand and obey the law

SimpliSafe is committed to ethical and compliant business practices that align to the spirit and letter of the various regulations, laws, and contractual requirements to which we're subject. We work in a fast-paced environment with a focus on being lean and nimble as we bring new innovations to market to help keep every home secure.

Importantly, customers trust us to protect their homes and families. They expect us to operate ethically and responsibly, using our best judgment in any situation, even when working under challenging factors.

Bribes and Kickbacks. A bribe is an intentional exchange (or even a promise) of something of value intended to influence a decision or action. A kickback is a form of bribe to be provided after the fact. SimpliSafe does not allow bribes or kickbacks to anyone, ever. Similarly, we do not accept bribes or kickbacks that are provided intending to influence SimpliSafe's decisions or actions. Further, we don't engage in any form of corruption, facilitation or "grease" payments, extortion, or embezzlement. We don't hire third party partners to engage in any similar corrupt behavior on SimpliSafe's behalf. Put simply: bribes are illegal, unethical, and prohibited by this Code. Employees are required to review and abide by the Anti-Corruption and Anti-Bribery Policy which is provided to all employees with training.

TIP:

Consider the sunshine test: How would we explain our decisions if this were to become public?



LAW continued

Global Trade. We comply with all restrictions on imports, exports, and other dealings with certain countries, persons, or groups. We don't support boycott activities.

Fair Dealing. We deal fairly with our customers, suppliers, business partners, and competitors, and we expect to win in the market with fair and reputable strategies and execution. While we aim high, we also expect all employees to do the right thing. Consult the Legal Team before considering any type of agreement or understanding that might appear to limit any party's freedom to conduct business with others or to conduct business in a particular geographic area.

Ensuring Accurate Books and Records. We ensure that SimpliSafe's books and records, specifically our financial accounting records, are true, accurate, and complete. We follow SimpliSafe policies around financial reporting controls as well as all applicable accounting principles. Even if you're not directly responsible for preparing financial reports, you're responsible for ensuring that relevant transactions—from a dinner receipt to an invoice approved for payment—accurately reflect the transaction. Any records relating to SimpliSafe's performance of government contracts will be retained for any required statutory or regulatory period, as well as any contractually required period. If you become aware of any records, material, or other information that reveals fraud related in any way to a government contract, you must immediately bring it to the attention of the Legal Team.

INTEGRITY: Conduct business with integrity

Our conduct reflects our commitment to doing the right thing - not just when others are looking, but all the time. Not only do our customers, investors, and business partners expect us to conduct business with integrity - we expect that of ourselves and each other.

Responsibilities of managers: At SimpliSafe, managers have an added responsibility to lead by example and support their teams, particularly in situations where others rely on them for guidance and direction

As a manager, you aren't expected to have all the answers to every situation or fact pattern; however, you're expected to use your best judgment at all times, be a positive leader and role model for other members of your team, and report or escalate any compliance issues that you see or are brought to your attention. You're expected to understand our values and this Code and model it in your daily work and all interactions. You're expected to set clear expectations with your teams and make sure they understand what's expected.

You're also expected to keep your door open and listen for anything that could suggest an employee is experiencing an issue that requires attention. And you should encourage team members to come to you or other trusted people from our People Team, Legal Team, or other functions for help. You should listen to understand, offer thoughtful guidance, and follow up promptly. Contact People Team promptly for any issues that require further support or with general questions about doing what is SimpliRight.

INTEGRITY continued

Please don't feel you need to investigate and/or resolve all the issues on your own. You should, however, take prompt action to identify key facts and escalate as needed, and you should never retaliate or allow others to retaliate.

Responsibilities of everyone: We expect everyone to protect our company and its reputation, thereby ensuring we can protect our customers and their homes, by conducting ourselves in strict compliance with this Code of Conduct, our internal policies, and all applicable laws. We hold ourselves to the highest ethical standards to conduct business with integrity - and we all speak up if we have concerns.

SimpliRight applies to all directors, officers, employees, and consultants and contractors working at SimpliSafe, at any subsidiary (owned or controlled, wholly or in part, by SimpliSafe) around the world. Anyone who acts on our behalf is expected to embrace the spirit of this document and to behave with the highest level of integrity.



INTEGRITY continued

Conflicts of Interest. We always act in the best interest of SimpliSafe with our focus on customer obsession. Your duty of loyalty lies with SimpliSafe. You avoid situations that result in actual or perceived conflicts of interest. A conflict of interest exists or may arise when an employee's personal, financial, or other interests compromise that employee's ability to make sound and objective decisions that are in the best interest of SimpliSafe.

If you discover that a personal relationship, investment, opportunity, or position could compromise—or could even appear to compromise—your duty of loyalty to SimpliSafe, you should disclose it immediately to your manager. It's your responsibility to report these issues. Some conflicts may be mitigated via disclosure and some basic preventative measures. The Legal Team can help you evaluate the best choices for your unique situation. Other conflicts must always be avoided. Please carefully review the Conflicts of Interest Policy (available in our Employee Handbook) for more information about potential conflicts and how to address them.



INTEGRITY continued

General Guidance: You should:

- Never personally benefit from a SimpliSafe or client transaction;
- Avoid situations where interests of family members or close relatives may be at odds with SimpliSafe;
- Never accept gifts from anyone that SimpliSafe is doing or considering doing business with;
- Never use SimpliSafe assets for personal gain;
- Avoid any external employment or engagements that may negatively impact your job performance (including but not limited to any affiliation with SimpliSafe competitors, customers, suppliers, or business partners) without prior written approval from management.

Use of Third Parties. We choose our partners carefully. SimpliSafe's reputation is tied to the actions of those with whom we choose to do business. Therefore, you're accountable for carefully managing relationships with any business partner, vendor, supplier, or other third party. You must ensure that its reputation in the market is solid, conduct appropriate due diligence, and work with the Legal Team and our Information Security team to secure a contract before engaging with a third party. You must ensure they're qualified to do the work that we're hiring them to do and only pay fair market value for the products or services they're providing SimpliSafe. Then, you must monitor the third party for compliance with Company expectations, as outlined in this Code, as well as compliance with all contractual rights and obligations. You must immediately escalate to your manager or the Legal Team if you suspect that one of our customers, suppliers, vendors, or business partners is potentially engaging in money laundering or any corrupt behavior.

INTEGRITY continued

Business Courtesies. We understand the value in using gifts, meals, travel, and entertainment to create goodwill and sound working relationships. These types of business courtesies should be for a legitimate business reason, reasonable and customary, infrequent, given openly and transparently, and properly recorded in our books and records where appropriate. SimpliSafers and their immediate family members are prohibited from giving or receiving cash and/or any unreasonable/lavish or uncustomary gifts from anyone with whom SimpliSafe does business or is negotiating on behalf of SimpliSafe. VP level approval is required for any business courtesy, exchanged between a SimpliSafer and a third party, reasonably valued at or above \$250 in a given 12 month period. We also understand that attending team building or accomplishment celebrations (i.e. team dinners or social events) can involve hard to determine potential costs in light of on the spot ordering. We ask you to use your best judgment here, if in doubt check with your manager before the event and get your VP approval where prudent. If necessary, we can always offer to compensate the third party for SimpliSafe's fair share of the costs, or we cover the next equivalent joint event.

Government employees in the U.S. and outside the U.S. are subject to complex laws and regulations that strictly limit their ability to solicit, receive, or accept gifts and gratuities, including meals, favors, entertainment, loans, hospitality, or other things of value from companies and persons with whom the government does business or over whom it exercises regulatory authority. Employees are prohibited from offering any gift or gratuity to a U.S.

INTEGRITY continued

Government employee or representative. If you have any questions about whether extending a gift or gratuity to a U.S. Government employee or representative is permissible, please contact the Legal Team. See our Anti-Corruption and Anti-Bribery Policy for more details.

Political and Charitable Contributions and Lobbying. Don't use SimpliSafe resources to make political or charitable contributions without Legal Department approval. SimpliSafe respects your right to be involved in political activity and to contribute your own time and resources. Please consult the Legal Team before entering into any type of lobbying either directly or through a third party.

Speak truthfully and honor our promises. Our business relationships are grounded in mutual trust and have been throughout SimpliSafe's history. We build and maintain the trust and confidence of our customers, the public, regulators, and other business partners by communicating honestly, respecting information entrusted to us and standing behind our commitments. Honoring these promises requires us to understand any obligations we have as a company and as employees to third parties (whether from contracts or legal or regulatory obligations), and ensuring we hold ourselves accountable to live up to those promises.

RESPECT: Treat people with respect and dignity

We foster a safe, collaborative, inclusive work environment to facilitate innovation and deliver excellent business results. We can't achieve our mission of keeping every home secure without our people working to meet their potential. We're committed to a safe, collaborative, and inclusive workplace that lets all of our employees develop and apply their unique capabilities and make meaningful contributions to SimpliSafe's success.

Anti-discrimination and Harassment Policies. SimpliSafe is an equal opportunity employer and affirmatively acts to ensure equal employment opportunity. SimpliSafe prohibits discrimination and harassment of any type. We respect the diversity of ideas and encourage an atmosphere of trust, fairness, openness, and candor. We place a high value on a respectful and inclusive work environment that encourages employees to bring their authentic selves to work.

Equal Opportunities and Employee Rights. We ensure that equal employment practices apply in the recruitment, hiring, training, and promotion of the most qualified candidates, regardless of personal characteristics. We provide competitive compensation and work hours, and we prohibit the use of child and forced labor.



TIP:

Our success relies on SimpliSafer to create and enable our technologies

RESPECT continued

Safe Work Environment. We provide a safe working environment, as the health and safety of all SimpliSafer is our top priority. We take precautions and put procedures in-place to support this, and we need your help. First, we have a zero-tolerance policy for workplace violence. You should not engage in any act that could cause another individual to feel threatened or unsafe. And you should take immediate action if you see a situation that could put others at risk. We also expect that you follow all safety procedures. Additionally, don't work impaired because of alcohol or drug use. The distribution, dispensing, possession or use of illegal drugs or other controlled substances, except for approved medical purposes, at any SimpliSafe office or site where employees are engaged in work-related activities is strictly prohibited.

Workplace Bullying. Along with our Culture of respect, SimpliSafe has a strict policy against any workplace bullying. Bullying of any colleagues, site personnel, customers, vendor partners, or any other third parties, by anyone at SimpliSafe is simply not tolerated.

See our Employee Handbook for specifics on our Equal Opportunity, Harassment, Discrimination, Retaliation, Anti-Bullying and other employment policies.

SimpliSafe



STEWARD: Safeguard company assets and interests

Employees must use SimpliSafe's resources and property solely for the benefit of the company. You must not misappropriate or misuse SimpliSafe assets. Company assets are anything that belongs to SimpliSafe and includes, but not limited to, physical resources like laptops and office equipment; intellectual property; intangible assets and proprietary information; information concerning pricing, products and services being developed; technical or business strategies, etc. You must hold these assets in the strictest of confidence.

Company Records. The use, expenditure, and disposal of SimpliSafe's resources must be documented as required by SimpliSafe's procedures. Documents and other records must be maintained in accordance with the applicable requirements of law, contracts, and company policies and shall not be used for personal gain or benefit. Using only approved devices and applications for business communications is critical. No employee or anyone acting on the SimpliSafe's behalf shall take any action to circumvent the SimpliSafe's system of internal controls or provide misleading information in documents and records.



TIP:

Treat company property like your own does not mean use it like your own

STEWARD continued

Physical Property. Treat SimpliSafe property as if it were your own, taking a lean and nimble mindset when it comes to our resources. For example, protect our physical assets, such as offices, supplies, IT equipment, and company monies. Don't steal or abuse company property. SimpliSafe assets may only be used for business purposes, although occasional private use is permitted if it doesn't conflict with SimpliSafe's interests. Beyond physical assets, spend SimpliSafe's money as if it were your own. That means not wasting funds on unnecessary expenses, seeking bids to obtain the best deal possible for the company, and confirming that products or services were delivered as agreed to before approving and paying invoices.

Confidential Information. Our most valuable asset, aside from our employees, is our information. Protect SimpliSafe's confidential information as well as our intellectual property. "Confidential Information" is defined in our Employee Handbook and includes information relating third parties that SimpliSafe is obligated by law or agreement to maintain in confidence. Remember:

- Proper Use – Confidential Information should be shared on a need to know basis and only used as required to perform your job
- Marking – mark sensitive information as "Confidential" or "Proprietary" and store, transfer, and protect it accordingly

STEWARD continued

- Storage – don't store any Confidential Information on any electronic device or cloud-based account that's not owned, maintained and monitored by SimpliSafe
- Ongoing obligations – your obligation to protect and refrain from using or disclosing trade secrets and other proprietary or Confidential Information continues even after you leave SimpliSafe – all files, records and other information acquired or created in the course of your employment are the property of SimpliSafe and, like SimpliSafe's physical property, must be returned upon separation
- Be mindful – don't discuss or review confidential information in places where you can be easily overheard or observed by others

Intellectual Property. It's essential for all employees to safeguard SimpliSafe's trade secrets and Confidential Information and to refuse any improper access to trade secrets and confidential information of any other company or entity, including our competitors. Company Confidential Information should also be handled on a strict need-to-know basis, even within SimpliSafe. If in doubt, check with your manager or our IP – Legal Team. If there's a need to disclose SimpliSafe trade secrets or Confidential Information to any person outside the company, such disclosure must be done only in conjunction with an enforceable non-disclosure agreement. Similarly, SimpliSafe's rights related to its technology and products must be protected by use of appropriate agreements whenever such technology and/or products are used, transferred, or disclosed.

STEWARD continued

Privacy. We protect the privacy of any personal data we collect, access, use, store, share, or dispose of (including but not limited to customer data and employee data). You must only use personal information for legitimate business purposes and always be transparent about SimpliSafe's practices around personal data. You must provide choice to individuals regarding their privacy preferences. Please consult our [Privacy Policy](#) for more information.

Protect Our Information Technology Assets. Technology is the gateway into a company's information and operations. Unauthorized access to the SimpliSafe's IT systems could lead to the unwanted disclosure of Confidential Information, intellectual property, or customers' or employees' personal information. Similarly, unauthorized access to our systems could also severely impact our ability to operate as a business. It's all of our jobs to protect our IT systems. Never share your password with anyone. Never leave your SimpliSafe devices unattended. Always watch for potential phishing or social engineering schemes. Don't open suspicious emails or click on suspicious links. Don't authorize any financial transaction solely based on instructions that originated from a telephone call or email. Immediately contact our InfoSec Team if you suspect any unauthorized access, security incident or breach.

STEWARD continued

Outside Communications. Don't make any public statements on SimpliSafe's behalf unless you have specifically been authorized to do so. Refer any media inquiry or contact by a government regulator to SimpliSafe's Legal Department. Get approval from the Legal Team before you plan to take part in a work-related public speaking opportunity. Use good judgment and common sense when using both public and private social media platforms. Never disclose Confidential Information or information about our employees, customers, suppliers, or other business partners on social media. Whether using a personal or SimpliSafe device, never make threats, bully, discriminate, or harass others.

Insider Trading. You may learn material non-public information about SimpliSafe, a competitor, customer, supplier, or business partner in your role at SimpliSafe. Material non-public information may include plans for mergers or acquisitions, marketing strategy, financial results or other business dealings that are not publicly available. You're prohibited from trading securities of a publicly held company or influencing others (including family members and friends) to trade securities based on material non-public information. Criminal and civil penalties for violating securities laws and engaging in insider trading are severe. If you have a question about whether the sale or purchase is permissible, contact the Legal Team.

DO GOOD: Be a responsible member of community

We're committed to protecting our planet, the environment, and the precious resources we all share. This includes our commitment to sustainable growth and supporting our employees, business partners, customers, and communities so we can make the world a better place while advancing our mission of making every home secure.

Product Safety. We're responsible for protecting millions of consumers' homes and families. Safety is the defining service that we provide and goes into every decision we make in designing and developing innovations to delight our customers. We're committed to the highest standards of quality, safety, and integrity in our products. Customer obsession is what keeps us innovating and designing improved products and services to keep our customers families and homes safe and secure. We comply with the laws and regulations that apply to our products and processes. These laws and regulations include those governing the sourcing, manufacture, quality, packaging, advertising, distribution, support, and export of our products in the countries where we do business. We promptly address any issues and product quality complaints.

TIP:

In addition to keeping customers safe, we need to think about our impact on their (and our) world

DO GOOD continued

Combatting Trafficking in Persons. SimpliSafe prohibits its employees and agents from engaging in trafficking in persons, procuring commercial sex acts, using forced or child labor in performance of contracts, withholding or destroying employee identification or immigration documents, using fraudulent tactics in recruiting workers or use recruiters who engage in such tactics, charging employees recruitment fees, failing to provide, in certain circumstances, return transportation at the end of employment, or providing substandard housing.

Sustainability. We strive to continuously improve our sustainability efforts and decrease our environmental impact on the planet. We're committed to complying with the environmental laws and regulations in the markets where we operate and expect all companies and contractors doing business with us to do the same.

Giving Back. We support the communities in which we live, work, and play. We constantly seek to foster good relationships within the communities in which we operate and encourage SimpliSafers to engage in local activities aimed at community development and improvement. We support those who, in their capacity as private citizens and not SimpliSafers, decide to participate in the electoral or governmental process so long as that work is conducted on their own time, using their own money.

ACT: Speak Up if you see a problem

We expect that you report any known or suspected conflicts of interest, ethics, or compliance issues. We protect anyone who chooses speak up in good faith with our zero-tolerance policy for any retaliation.

Integrity is at the core of our reputation. This Code isn't intended to be a comprehensive rulebook and can't address every situation that you may face. Each of us is expected to use our best judgment in reading this Code and applying the guiding principles to real world situations which can be complicated and constantly evolving. If you feel uncomfortable about a situation or have any doubts about whether it's consistent with SimpliSafe's ethical standards, seek help. Speaking up when you need help understanding or following a policy, asking questions, and reporting potentially inappropriate behavior are all part of a healthy culture and the responsibility of all employees.

You're required to speak up if you suspect someone you work with, work for, or contract with is violating our Code of Conduct or the law. You're also required to understand your obligations explained in this Code, our Employee Handbook and related policies, make good-faith reports, and cooperate fully with investigations.



TIP:

Don't wait for someone else to do something. Speak up and get help.

ACT continued

When to Report a Concern. In accordance with our Speak Up Policy, all employees, officers, and directors as well as consultants and contractors, are required to report suspected noncompliance with this Code of Conduct, SimpliSafe's policies or any applicable law. Employees are required to come forward with any such information, without regard to the identity or position of the person or entity involved. SimpliSafe will treat the information in a confidential manner to the fullest extent possible. If you know of or suspect any violation of this Code, you must immediately report the conduct to your supervisor, the Legal Department, or People Team. You may be asked to share your observations and any facts, records, or context that may help the Legal Department investigate the concern. You should not conduct your own investigation of the suspected noncompliance prior to reporting it. Investigations are conducted by appropriate designated personnel.

Non-limiting examples of concerns appropriate to report include:

- Fraud, waste, or abuse
- Bribery, money laundering, etc.
- Conflicts of interest
- Environmental, health, and safety issues
- Human rights violations

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ACT continued

- Discrimination, harassment, or bullying
- Anti-competitive behavior
- Improper disclosure or misuse of confidential information or intellectual property
- Inadequate or inaccurate financial or non-financial record keeping
- Retaliation
- Violation of law or SimpliSafe policy

Important Reminders:

General questions related to your employment status or management business decisions should be addressed with People Team.

Any questions related to Information and Cyber Security can be directed our InfoSec Team.

Reports of potential violations of this Code should be reported on our Employee Helpline, where they can be made anonymously.