Verint Code of Conduct

Introduction & Purpose

The Verint® organization is committed to conducting business ethically, responsibly, and in compliance with all applicable laws. This Code of Conduct ("Code") reflects our shared expectations for how we work, interact, and make decisions. It guides employees, officers, directors, contractors, consultants, and anyone acting on behalf of Verint.

Our integrity is central to maintaining the trust of customers, business partners, regulators, and one another. This Code outlines expectations for ethical decision making, responsible behavior, and compliance across all roles and geographies. Failure to comply with the Code may result in disciplinary action, up to and including termination.

The Code is not exhaustive. While the Code cannot address every situation, all employees, officers, directors, contractors, consultants, and anyone acting on behalf of Verint must use good judgment, ask questions when unsure, and raise concerns promptly. Additional policies may apply based on job responsibilities, legal requirements, and industry standards. The Code is not intended to create a contract and does not alter employment terms, which remain governed by applicable law and Verint policies.

Scope & Applicability

This Code applies to the following groups (collectively, "Verint Personnel"):

- All employees of Verint, regardless of role, level, or location
- Officers, directors, and members of leadership
- Contractors, temporary workers, interns, consultants, and agents acting on behalf of Verint

Verint Personnel are expected to uphold the highest levels of integrity in all business interactions. Compliance with local law, industry-specific regulations, and internal policies is mandatory.

Third-party partners, suppliers, vendors, and service providers are expected to abide by Verint's Third Party Code of Conduct which aligns to this Code.

Verint Values

Verint is built on five core values that shape the way we do business with our customers, our partners, and each other. They express the company we want Verint to be – from the people we hire to the way we design our products – and they guide us in the decisions we make every day.

- One Team: We are better together: aligned, accountable and committed to shared success.
- Continuous Innovation: We continuously reinvent ourselves continuously for the benefit of the business. Best idea wins.
- Zero Daylight: We are direct, honest and timely communications with each other and our customers.
- Bias to Action: We are proactive, take initiative and execute with purpose. We value urgency/speed.
- Customer Powered: We prioritize customers at the center of every decision.

These values embody the spirit of Verint and form the foundation for superior solutions, unparalleled service, and an unwavering commitment to the success of our customers, our partners, and Verint.

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Ethical Standards & Conduct

Verint expects all Verint Personnel to act with integrity, professionalism, and respect. Ethical behavior is essential not only to our success but also to maintaining trust with customers, regulators, partners, and colleagues. Before making a decision, Verint Personnel should evaluate its legality, policy compliance, risk of harm, consistency with Verint Values, and potential reputational impact.

Verint Personnel must:

- Follow all applicable laws, regulations, and internal policies
- Avoid conflicts of interest or the appearance of impropriety
- Protect Verint assets and confidential information, including adherence to information security policies, technology monitoring protocols, and password standards
- Treat others with dignity and fairness
- Use technology, communication channels, and resources responsibly
- Demonstrate honesty in financial reporting, customer interactions, and all business dealings
- Conduct all work free of discrimination, intimidation, harassment, or violence
- Promptly report suspected violations, without fear of retaliation

See Verint's specific subject matter policies and procedures (including as outlined in this Code) for more details. Verint Personnel who are unsure how to handle a situation should seek guidance from their manager, HR, or Legal.

Equal Opportunity & Anti-Harassment / Discrimination

Verint has a zero-tolerance policy against any form of discrimination, retaliation, or harassment including sexual harassment or any other form of harassment based on race, color, religion, sex, age, national origin, genetic information, disability, veteran status and any other classification or characteristic protected by applicable federal, state or local laws.

Verint operates in accordance with all anti-discrimination laws and affords equal opportunities to all Verint Personnel and applicants for employment by Verint without regard to any characteristic or protected class in our hiring, promotion and termination practices. Verint conforms to the spirit as well as to the letter of all applicable laws and regulations regarding anti-discrimination.

Harassment, including verbal, visual, physical, or sexual conduct, is strictly prohibited. Verint Personnel must not engage in unwanted advances, derogatory remarks, inappropriate jokes, or any conduct that creates an intimidating or offensive environment.

Verint strives to foster an inclusive and respectful workplace.

See Verint's employee handbook and other related policies.

Fair & Healthy Workplace

Verint is committed to maintaining a safe and healthy work environment where everyone is treated with dignity, professionalism, and respect. All Verint Personnel share responsibility for creating and maintaining a workplace that is free of discrimination, harassment, violence, unsafe conditions, or any behavior that undermines individual well-being. In addition, Verint does not tolerate misconduct outside of the workplace that affects employee performance, the performance of other employees, or Verint's legitimate business interests.

Prohibited conduct includes:

- Threats, intimidation, stalking, or any form of violence

- Possession of unauthorized weapons on Verint property
- Impairment at work due to drugs or alcohol
- Using the workplace to gamble or engage in illegal activities

Verint Personnel must:

- Act respectfully in all interactions
- Maintain a workplace free of intimidation, hostility, or abusive conduct
- Promote cooperation and professionalism
- Comply with all environmental, health, and safety laws
- Report unsafe conditions, threats, or misconduct promptly to their manager or, as appropriate, Facilities

See Verint's health and safety policies and related procedures for more information.

Anti-Corruption & Anti-Bribery

Verint strictly prohibits bribery, corruption, extortion, kickbacks, and improper payments in all business dealings. Verint Personnel must comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), United Kingdom Bribery Act, and similar global regulations. Verint Personnel must maintain accurate records of all transactions entered into on behalf of Verint using appropriate Verint systems where required or available for that purpose and must report any suspected bribery or corruption immediately.

Verint Personnel may not:

- Offer, give, or receive anything of value to improperly influence a business decision
- Make facilitation payments unless expressly permitted by law and Verint policy (rare)
- Use third parties to engage in behavior Verint itself is prohibited from engaging in
- Provide gifts or anything of value to government officials or foreign officials without prior written approval from a member of the Verint Legal Team.

Gifts or business courtesies may only be exchanged in ways that support legitimate business purposes and never to improperly influence business decisions. Verint Personnel must:

- Never offer or accept cash or cash-equivalent gifts
- Avoid gifts that create an appearance of obligation or conflict
- Ensure entertainment is modest, infrequent, and tied to a legitimate business interaction
- Follow all anti-corruption laws when interacting with government officials
- Disclose gifts when required by Verint policy

See Verint's Global Anti-Corruption Policy and related procedures for more information.

Trade Compliance & Sanctions

Verint Personnel must comply with all laws governing international business, including export controls, sanctions, government procurement regulations, and import and customs requirements. Verint may be subject to U.S. and international regulations covering the transfer of technology, classification of software, technical data, and services.

Prohibited conduct includes:

- Doing business with sanctioned parties or restricted countries
- Exporting controlled technology without authorization
- Misrepresenting the origin, classification, or value of goods
- Circumventing licensing requirements

See Verint's trade compliance and sanctions-related policies and related procedures for more information.

Confidentiality & Proprietary Information

Verint's confidential and proprietary information is one of its most valuable assets. Verint Personnel must protect this information and only use it for legitimate business purposes. Confidential information includes, but is not limited to:

- Business plans and strategies
- Trade secrets and intellectual property
- Customer lists and contract terms
- Financial information
- Personnel data
- Internal communications not intended for public disclosure

Verint Personnel must not disclose confidential information through personal accounts, devices, or on social media platforms or disclose confidential information to any third party unless authorized and protected by appropriate protective agreements, and then only on a need-to-know basis. These obligations continue after employment ends.

Data Privacy & Data Protection

Verint is committed to protecting the privacy of Verint Personnel, customers, partners, and any individuals whose Personal Information (broadly defined as including names, contact information, SSNs, financial information, medical info, etc.) we process. All Verint Personnel must comply with applicable privacy laws, contractual agreements and internal policies, including those governing the collection, use, storage, transfer, and disposal of Personal Information and safeguard such data at all times.

Personal Information must only be accessed or used for legitimate business purposes, in accordance with contractual requirements, and must be protected against unauthorized access, use or disclosure.

See Verint's data privacy and protection policies and related procedures for more information.

Protection of Intellectual Property

Verint's intellectual property ("IP") — including inventions, patents, ideas, processes, trademarks, copyrights, trade secrets, and related materials — must be protected and used only for legitimate business purposes. Verint Personnel must respect Verint's IP and the intellectual property of third parties including our customers and suppliers.

Any inventions or innovations created by employees in the course of their work belong to Verint. All records related to inventions must be maintained as trade secrets, and employees must assist in securing patents even after employment ends.

Verint enforces rules regarding:

- Use of open source software

- Protection of patent eligible ideas
- Proper handling of proprietary code and source materials

See Verint's intellectual property policies and related procedures for more information.

Information Security & Use of Verint Assets/ Technology

Verint may monitor employee use of Verint systems, inspect devices, and access data stored on Verint assets as permitted by law. Verint Personnel must not assume absolute privacy when using Verint systems.

Verint Personnel have a duty to report any security incidents (phishing, malware, data exposure) to the Security Team.

Verint Personnel must use Verint assets (including computers, networks, email, software, mobile devices, facilities, and intellectual property) responsibly, securely, and primarily for legitimate business purposes. Limited personal use may be permitted when it does not interfere with job performance or create security risks.

Verint Personnel must not:

- Use unapproved communication tools for business
- Use unapproved cloud storage, SaaS subscriptions and generative AI tools
- Download or install software on Verint systems or devices unless approved by IT
- Share confidential information through personal accounts or devices, or on social media platforms
- Use Verint systems to access inappropriate or illegal content
- Engage in harassment or discrimination on Verint systems

See Verint's Information Security policies and related procedures, including the Approved Software Register, for more information.

Artificial Intelligence

Verint embraces the use of AI to enrich and enhance operational efficiencies, while leveraging protective policies and practices. When using AI, Verint Personnel must at all times ensure the protection of Verint's assets, and take steps to minimize potential risks. This includes:

- Only using Verint AI services, and use cases, approved through Verint's AI approval processes
- Using AI only in accordance with applicable laws and regulations
- Ensuring AI is used in a manner consistent with the core values and objectives of Verint
- Exercising due diligence, critical thinking and human validation when using AI-generated outputs

Verint is committed to developing AI technology in an ethical and responsible manner to create trustworthy AI and has adopted principles to inform this commitment. These principles are incorporated into our company culture and are ingrained in the processes used to deliver the technologies and solutions we provide to our customers.

See the AI Use Policy and the Verint Responsible & Ethical AI Whitepaper on our website for more information.

Insider Trading

All Verint Personnel and their spouse, minor children and anyone else living with them, or any group or entity where Verint Personnel has or shares with others the power to decide whether to buy, hold or sell another company's securities, must comply with securities laws and uphold Verint's integrity by prohibiting the use or sharing of material, non-public information for personal gain.

Verint Personnel may not buy, sell, or otherwise trade in the securities of any company with which Verint does business while in possession of material, non-public information, nor may they disclose such information to others, including family and friends.

Material information includes any non-public fact a reasonable investor would consider important, such as financial results, significant transactions, litigation, management changes, or cyber incidents.

Penalties for insider trading are severe and may include substantial criminal fines, civil penalties up to three times the profit gained or loss avoided, and imprisonment, as well as Verint disciplinary action up to termination. These obligations apply even when personal circumstances may make a transaction seem necessary, and they continue after a person's relationship with Verint ends, for as long as they possess material, non-public information obtained while working at, with or on behalf of Verint.

Financial Integrity & Recordkeeping

Verint is committed to maintaining accurate financial records and ensuring compliance with accounting standards, legal requirements, and internal controls. All financial transactions must be recorded truthfully, accurately, promptly, and completely using appropriate Verint systems where required or available for that purpose. Verint Personnel must never falsify, misstate, or omit information in Verint records.

Verint Personnel must:

- Ensure all expenditures reflect legitimate business purposes
- Follow Verint policies for approvals, expense reporting, and documentation
- Maintain accurate books, records, and accounts
- Cooperate fully in audits, investigations, and reviews
- Timely disclose any credible evidence of fraud, bribery, or False Claims Act or similar legal or regulatory violations

Verint prohibits:

- False or misleading entries
- Maintaining unrecorded funds or assets
- Mischaracterizing transactions
- Altering or destroying documents improperly

Sales Practices & Competition

Verint competes fairly, honestly, and ethically. All sales activities must comply with applicable laws, avoid deceptive or misleading practices, and reflect integrity in every customer interaction.

Verint Personnel must:

- Compete based on merit, product quality, and service
- Avoid misrepresentations about products or competitors
- Honor contractual obligations and obtain Legal approval before modifying contract terms or offerings

- Ensure all charges to customers are accurate and properly documented
- Report any improper conversations with competitors

Verint prohibits:

- Anti-competitive agreements
- Price-fixing, bid rigging, or coordination with competitors
- Misuse of market-sensitive information
- Steering customers to inappropriate products

Conflicts of Interest

Verint Personnel must avoid situations where personal, financial, or family interests conflict — or appear to conflict — with the interests of Verint. All business decisions must be made in the best interest of Verint, not for personal benefit.

Verint Personnel must disclose potential conflicts, such as:

- Outside employment or consulting that could impair job performance or create a conflict
- Financial interests in a competitor, customer, or supplier
- Close personal relationships in reporting lines
- Participation in vendor selection when a personal relationship exists
- Board memberships, political involvement, or external affiliations that could compromise objectivity

Any potential conflicts must be disclosed to a Verint Personnel's manager, or to HR or Legal.

Speaking on Behalf of Verint

Only authorized Verint Personnel may speak on behalf of Verint to external audiences, including the media, analysts, investors, government officials, or the public. Unauthorized public statements may expose Verint to reputational or legal risk.

Verint Personnel must:

- Refer all media inquiries to designated Verint representatives
- Avoid commenting publicly on Verint matters without approval
- Never disclose confidential information publicly
- Follow internal processes for press, legal, and regulatory communications

See Verint's Social Media Policy for more information.

Training

Verint has an annual training program that covers Verint Personnel's obligations under this Code and policies pertaining to bystander intervention and workplace harassment, information security, AI and data privacy, anti-bribery / anti-corruption and global trade compliance more broadly.

Reporting Concerns & Non-Retaliation

Verint encourages an environment where Verint Personnel feel safe raising concerns about potential violations of law, policy, or ethical standards. Verint Personnel must promptly report any suspected

misconduct, including unethical behavior, illegal activity, safety concerns, harassment, financial irregularities, data misuse, or violations of this Code or other Verint policies.

Reports may be made to:

- Your manager or any member of leadership
- HR
- Legal
- Information Security, via Service Now
- Verint's Ethics Hotline, which supports confidential and, where legally permitted, anonymous reporting

Retaliation is strictly prohibited against anyone who reports concerns in good faith, participates in an investigation, or seeks guidance. Verint will investigate reports promptly, fairly, and with appropriate confidentiality.

Questions on the Code

If you have any questions concerning any aspects of the Code, please direct these to your manager, HR or Legal.

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