



Dear Employee,

As a company whose mission is to accelerate investigations for a “Safer World,” Cellebrite is committed to upholding the highest standards of professional and ethical conduct. To support the company’s mission and goals, Cellebrite has implemented various controls and systems to ensure its missions statement is adhered to worldwide.

Our success depends on maintaining our reputation and the trust and the confidence of governments, our customers, partners, employees and suppliers.

Each of us is a representative of Cellebrite, and it is important that we work together, as a team, to achieve the company’s goals while understanding and respecting our standards.

Please take the time to read our Code and use it in guiding your day-to-day conduct on the job.

Sincerely,



Yossi Carmil
CEO

Introduction

This Code of Business Conduct and Ethics (the “**Code**”) is designed to promote honest, ethical and lawful conduct by all employees, officers and directors (collectively, “**Employees**”) of Cellebrite DI Ltd (“**CLB**”), and any of its subsidiaries and entities controlled by it (collectively, the “**Company**”). For the purposes of the Code, contractors and temporary workers working on the Company’s behalf and representing the Company are also considered Employees. The Code is intended to help Employees understand the Company’s standards of ethical business practices and raise awareness of ethical and legal issues that may be encountered in carrying out their responsibilities.

The actions of every Employee affect the reputation and integrity of the Company. Therefore, it is essential that each individual take the time to review this Code and develop a working knowledge of its provisions. In particular, all Employees are expected at all times to:

- Avoid conflicts between personal and professional interests and alert management immediately if any such conflicts arise;
- Pursue ethical business conduct and strictly adhere to anti-bribery and anti-corruption rules;
- Work to ensure our work environment is harassment free;
- Comply with applicable governmental rules and regulations;
- Promptly report any violations of this Code; and
- Be accountable personally for adherence to this Code.

This Code is part of a broader set of Company policies and compliance procedures that Employees must adhere to regardless of whether the Employee signed this Code.

Day-to-day life at the Company can be dynamic. Therefore, this Code does not purport to predict or cover all of the various circumstances that an Employee may encounter.

Employees who violate the standards in this Code will be subject to disciplinary action up to and including termination of employment. If an Employee is in a situation that he/she believes may involve or lead to a violation of this Code, he/she has an affirmative duty to disclose the situation and seek guidance from an appropriate internal authority.

Conflicts of Interest



Activities on behalf of the Company

The Company expects all Employees to exercise good judgment in their activities on behalf of the Company. Employees are expected to engage in and promote ethical conduct and to take care when there are actual or apparent conflicts of interest between personal and professional relationships. ✓

What is a “Conflict of Interest”?

A conflict of interest can develop when personal responsibilities, interests and/or relationships interfere with, or appear to interfere with, professional responsibilities, interests and/or relationships (including the interests of the Company and/or your duties in your respective role at the Company). Employees are expected to engage in and promote ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

Pay attention also to the mere appearance of a conflict, since such appearance might impair confidence in, or the reputation of the Company, even if there is no actual conflict or wrongdoing.

What to do when you suspect a Conflict of Interest, from your or from a peer’s perspective?

Disclose your concern or any material transaction or relationship that reasonably could be expected to give rise to such a conflict to a responsible manager or other appropriate internal authority named under “Duty to Report Violations” below.

Conflicts of interest may not always be clear-cut, so if you have a question, or become aware of a conflict or potential conflict, please contact your responsible manager or other appropriate internal authority named under “Duty to Report Violations” below.

Employment or Engagement of Family Members

The employment or the engagement with an Employee’s Family Members (as defined below) may give rise to conflicts of interest because they may influence an Employee’s objectivity in making decisions on behalf of the Company. Nonetheless, the Company permits the employment of or the engagement with Family Members, provided that:

- If a Family Member of an Employee is interested in doing business with the Company, the criteria as to whether to enter into or continue the business relationship with the Company, and the terms and conditions of the relationship, must be no less favorable to the Company compared with those that would apply to a non-relative seeking to do business with the Company under similar circumstances.
- If a Family Member of an Employee is interested in being employed by the Company, the criteria for any existing or potential employment by the Company, and the terms and conditions of

employment, must be no less favorable to the Company compared with those that would apply to a non-relative seeking to be employed by the Company under similar circumstances.

- Employees shall not supervise or be supervised by a Family Member. Furthermore, Employees must not in any way be or attempt to be involved in the transfer, assignment, promotion, performance appraisal, compensation and benefit level decisions, financial control decisions or any other decision affecting the work, employment and career management or other business engagement with Family Members.

“Family Member(s)” specifically refers to Employee’s parents, siblings, spouse and children, nephews/nieces, aunts/uncles, grandparents, grandchildren, in-laws, and includes all adoptive relationships.

Conflict of Interest might occur when:

- You or your family have a financial interest in the Company’s competitors, customers, suppliers, or other partners (excluding interests that are less than 1% of the shares of a public company or less than 5% of the shares of a private company); ❌
- You Solicit or accept any kind of gift or other benefit which may impair your judgement from customers, suppliers, or other partners of the Company ; or ❌
- You have a second job or responsibilities in other companies or serve on the board of directors of other companies, paid or unpaid. Employees are expected to devote their full time and attention to Company’s business, and, therefore, you should avoid outside business activities that divert your time and talent from the Company’s business. This is especially true when outside activities relate to companies that have any connection with our Company’s business. ❌

What to do when you consider taking a second job or responsibilities, or serve on a board of directors?

Disclose this to your manager and obtain the approval of the Company's Chief People and Corporate Development Officer.

Our Employees



Our Employees are our biggest asset, and we strive to ensure all of our Employees are treated with respect.

Equality and Diversity

The Company is an equal opportunity employer, and prohibits discrimination on the basis of race, color, religion, gender, sexual orientation, gender expression, national origin, disability, age, veteran status, or any other characteristic protected by law. The Company works to ensure individuals have equal opportunities to participate, receive comparable social and economic benefits, and do not suffer from discrimination. The Company will make reasonable job-related accommodations for any qualified Employee with a disability when notified by the Employee that he/she needs an accommodation. Cellebrite embraces the diversity of all Employees.

Hostile Environment and Harassment

The Company is committed to a workplace that is free from sexual, racial, or other unlawful harassment, and from threats or acts of violence or intimidation in all forms, including abuse, harassment or other offensive conduct.

The Company will not tolerate the possession, use or distribution of discriminatory or otherwise offensive materials on Company property or the use of the Company's computers or other equipment to obtain or view such materials. All Employees have a duty to act in accordance with this Code, to treat colleagues with dignity at all times, and not to discriminate against or harass other Employees.

What to do when you experience or suspect any type of Harassment or Discrimination?

Any person who believes that they have been harassed, threatened, discriminated against or subjected to violence of all forms in or in connection with the workplace should report the incident to the Company's Chief People Officer and Corporate Development Officer, or, in their absence, to the Employee's HR Business Partner. All efforts will be made to handle the investigation confidentially.

If you are aware of the existence of offensive materials, especially materials relating to pornography and child pornography, violence, racism, and drug and alcohol use, on the Company's systems, you must promptly contact an appropriate manager or Human Resources.

The Company will not, in any way, retaliate against Employees who make such allegations in good faith. False allegations which are found to have been made in bad faith will be investigated and dealt with accordingly.

Human Rights

Cellebrite is committed to upholding and respecting fundamental human rights across its operations and believes that all human beings around the world should be treated with dignity, fairness, and respect for their human rights. The Company's customers are contractually prohibited from using Cellebrite's products in violation of any applicable laws, including those related to human rights, as well as international human rights instruments that protect the rights of individuals.

The Company's policy is to engage only suppliers, contractors and other business partners who demonstrate a serious commitment to the health and safety of their workers, and who operate with respect for and do not infringe upon human rights.

Employees must respect the dignity and human rights of colleagues and all others they come into contact with as an integral part of their job and should be alert to any risk of adverse impact on human rights from onboarding new clients to service provision. Employees who encounter suppliers, contractors, customers or other business partners that violate human rights must inform their manager promptly of such violations.

Safe Workplace

The Company is committed to ensuring that the workplace is a “safe working environment.” Similarly, our policy is to only engage suppliers, and contractors who demonstrate a serious commitment to the health and safety of their workers.

Employees are obligated to take reasonable care of themselves and other Employees. All accidents, injuries, or concerns about unsafe equipment, practices, conditions, or other potential hazards should be immediately reported to an appropriate manager and a Human Resources Officer.

Personal Data Protection



The Company respects the privacy and dignity of all individuals, and we take appropriate measures to protect the personal data of our customers, our Employees and other parties we engage with. When we collect and process personal data, we will do so in compliance with the applicable data protection and privacy laws.

Employees Personal Data

The Company collects and maintains personal information that relates to the employment of its Employees. Special care is taken to limit access to such personal information only to Company personnel with a need to know such information for legitimate purposes. Employees who are provided access to such information must not disclose it in violation of applicable law or the Company’s policies.

Employees should not search for or retrieve items from another Employee’s workspace without the prior approval of that Employee or management. Similarly, Employees should not use communication or information systems to access information directed to or created by others without the prior approval of the direct manager, unless such access is part of the Employee’s job function and responsibilities at the Company.

Personal items, messages or information that an Employee considers to be private should not be placed or kept in telephone systems, computer or electronic mail systems, office systems, offices, workspaces, desks, credenzas or file cabinets. The Company reserves all rights, fully permitted by law, to inspect such systems and areas and to retrieve information or property from them when deemed appropriate.

Personal Data Breach

Any unauthorized use or access to personal data must be immediately reported to the VP Legal Affairs and General Counsel or the Compliance Officer and handled according to “Handling Personal Information and Breach Notification Policy.”

Anti-Bribery and Anti-Corruption



Anti-Bribery & Anti-Corruption

Cellebrite is committed to upholding the highest standards of ethics and integrity in its business activities. Employees must comply with all applicable anti-bribery and anticorruption laws, and are prohibited from offering, promising, making, authorizing, providing, soliciting or receiving (directly, or indirectly through third parties) any payments, gifts, or the transfer of anything of value to any person, including Government Officials and family members of such Government Officials, in any jurisdiction to influence or reward any action or decision for the Company’s benefit.

Pay attention - Government Officials involvement

The rules are stricter when Government Officials are involved.

A “Government Official” is a representative, officer, and/or Employee of any governmental agency, government owned (in whole or in part) or controlled entity, political party, and/or public international organization, including political parties and candidates for public office.

Never give or receive a bribe. Never give or receive cash or cash equivalents (e.g., gift cards).

Gifts & Hospitality



Bribes may be in the form of a Gift, Hospitality and anything else of value that may improperly influence your judgment or the judgment of others. Employees should decline gifts and entertainment if there is no legitimate business reason for acceptance. Business gifts or entertainment that are accepted or provided by Employees should be reasonable, not lavish, and permitted under applicable law.

Employees must not give anything of value, directly or indirectly, to any third party involved in the company’s business, including a Governmental Official, in consideration for the recipient’s assistance or influence, in order to obtain favored treatment for the Company. Under no circumstance is it acceptable for any Employee to offer, give, solicit or receive any form of bribe, kickback, payoff, or inducement. ❌

What to do when you are considering offering a gifts or hospitality, or those are offered to you:

Review and follow the Cellebrite “Gift & Hospitality” Procedure, where you can find all rules and approval requirements.

Third Parties acting on our behalf

The Company may be liable for the actions of third parties acting on our behalf, including agents, business partners, consultants and contractors. Therefore, Employees must be diligent about vetting the third parties with whom the Company engages to promote its business or to act on its behalf with Government Officials.

What do to when I seek to engage a “Third Party”?

Review and follow the Cellebrite “Third Party Engagement Procedure,” where you can find all the rules and approval requirements related to engagement with Third Parties.

When in doubt

Please refer any questions or concerns to the Company’s VP Legal Affairs and General Counsel or Compliance Officer.

Facilitation Payments

A facilitating payment is a payment to secure or expedite a routine government action by an official. Facilitation payments are prohibited. If there is an imminent threat to your health or safety, such as a threat of physical violence, you may provide a payment to avoid immediate harm. Loss of business is not an imminent threat. You must report the payment within 48 hours of its occurrence to the Company’s VP Legal Affairs and General Counsel or Compliance Officer.

Contributions and Charity

Contributions made to, on behalf of, or at the request of a Third Party may also create an actual or an appearance of improper influence, and may, therefore, only be permitted subject to certain conditions and approvals. Please refer to the Company’s “Gift & Hospitality” Procedure, where you can find all the relevant rules and approval requirements.

Protection and Proper Use of Company Assets



Protection and Proper Use of Company Assets

Every Employee has a personal responsibility to protect the assets of the Company from misuse or misappropriation.

The assets of the Company include both physical assets (such as products, equipment and facilities), and intangible assets, such as confidential information, intellectual property, trade secrets, and financial information.

Theft/Misuse of Company Assets

Company's assets may only be used for business purposes.

No Employee may sell, transfer, take, or make use of the assets of the Company for personal use, for use by another, or for an improper or illegal purpose.

No Employee is permitted to remove, dispose of, or destroy anything of value - both physical items and electronic information - belonging to the Company without the prior written approval of the Company's CEO.

Corporate Opportunities

No Employee shall deprive the Company of any business opportunity or benefit. No Employee may use the Company's property, information or other resources for improper personal gain. Employees may also not disclose any such opportunity to a third party or invest in the opportunity without first offering it to the Company.

No Employee may participate in an initial public offering or otherwise accept special investment opportunities from a supplier, vendor (excluding banks or financial advisers), or an existing or potential customer without first disclosing the opportunity to the Company's CEO.

Proprietary and Confidential Information

Our proprietary information is confidential and should be treated as such.

No Employee, officer or director of the Company who is entrusted with information of a confidential or proprietary nature (about the Company, its suppliers, customers or other constituents) shall disclose that information outside of the Company, except with written authorization from the Company or as may be otherwise required by law and subject to the signing of a non-disclosure agreement. The obligation to preserve confidential information continues even after employment ends.

Employees may not use proprietary or confidential information for their own personal benefit or the benefit of others. Employees should take reasonable steps and precautions necessary to restrict access to, and secure, such information. Employees should only share confidential or proprietary information on a "need-to-know" basis and should use their reasonable best efforts to prevent inadvertent or unauthorized disclosure.

Our proprietary and confidential information includes all of our assets and all non-public information received or created by the Company in connection with our business activities, and confidential information that third parties have entrusted to the Company, including, but not limited to, our:

- Intellectual Property such as the Company's products, software, and trade secrets which include all forms and types of financial, business, scientific, technical, economic, or engineering information, including patterns, plans, compilations, program devices, formulas, designs, prototypes, methods, techniques, processes, procedures, programs, or codes, whether tangible or intangible, and whether or not stored, compiled, or memorialized physically, electronically, graphically, photographically, or in writing;
- Business Information that might be of use to competitors or otherwise harmful to the Company or its customers if disclosed, such as Company's transactions, prospects or plans, marketing and sales

programs, R&D information, M&A information, customers, partners and supplier information, etc.; and

- Financial Information.

When in doubt

Review and follow the Cellebrite “Confidential Information Policy,” where you can find all guidelines.

Network Use, Integrity & Security

In order to maintain systems integrity and protect the Company information, no Employee should allow others to use his/her personal access permissions and any passwords which are personal and role based.

Any suspected breach of the Company’s network security systems should be reported to a responsible manager or appropriate internal authority immediately.

Employees may not use or distribute software that may damage or disrupt the Company’s work environment by transmitting a virus or conflicting with Company systems. No Employee should engage in the unauthorized use, copying, distribution or alteration of computer software whether obtained from outside sources or developed internally.

Cellebrite and the Marketplace



Respect for the Marketplace

Cellebrite is committed to conducting its business honestly, fairly and ethically.

Restricted Territories

Cellebrite considers any of the following “Restricted Territories”: (i) a territory that is the subject or target of certain sanctions; or (ii) a territory identified as a terrorist-supporting territory. Currently, “Restricted Territories” include Afghanistan, Algeria, Bangladesh, Belarus, Bolivia, Brunei, Burkina Faso, People’s Republic of China (China), the Crimea region, Cuba, Darussalam, Democratic People's Republic of Korea (a.k.a. “North Korea” or “DPRK”), Hong Kong, Iran, Iraq, Kuwait, Lebanon, Libya, Macao, Malaysia, Myanmar, Nicaragua, Pakistan, Palestinian Authority, Russian Federation, Saudi Arabia, Somalia, Syria, Sudan, Turkey, Venezuela, Yemen and Zimbabwe. Cellebrite undertakes to inform employees of any changes to the list of “Restricted Territories.”

Cellebrite contractually prohibits the offering, sale, transfer and/or use to or by any party, person or entity located in any of the Restricted Territories. Cellebrite further contractually prohibits the use of its products in violation of sanctions administered by the Office of Foreign Assets Control of the U.S. Department of the Treasury (“OFAC”) or the U.S. Department of State (including, without limitation, the designation as a “specially designated national” or “blocked person”), the United Nations Security Council (“UNSC”), the European Union, Her Majesty’s Treasury or other relevant economic sanctions authority.

Cellebrite may, from time to time, modify the list of Restricted Territories so as to include any territory where Cellebrite has reasonable grounds to believe that the use, sale, or otherwise making available of Cellebrite's product would be subject to any sanctions, or would otherwise be restricted or forbidden under any laws, rules and/or regulations or in case Cellebrite suspects that the usage of the product would jeopardize Cellebrite's business operations. Cellebrite may also modify the list to remove any territory when it has reasonable grounds to believe that the sanction or other reason for inclusion of that territory as a Restricted Territory no longer applies.

To support and enforce the above, Cellebrite uses an automated tool that screens customers to make sure the Company is following its policy and mission statement and is not exporting or reexporting to Restricted Territories or dealing with sanctioned parties.

Fair Dealing

We deal fairly, honestly and ethically with the Company's suppliers, customers, competitors, and Employees. No Employee should take unfair advantage of any such party, whether through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

The Company respects the confidentiality and privacy of its suppliers and customers. Information about the Company's suppliers, customers, competitors and Employees must be used in an ethical manner and in compliance with the law. Under no circumstance should information be obtained through theft, illegal entry, blackmail or electronic eavesdropping, or through misrepresenting one's affiliation with the Company or identity.

Customers and potential customers are entitled to receive accurate information regarding prices, capabilities, terms and scheduling.

The Company strives to produce advertisements that are fair, accurate and lawful. Employees may not utilize false or misleading statements to sell or market Company products or services.

Trade Practices and Antitrust Compliance

Vigorous competition -- free from collusion and unreasonable restraints -- is the best mechanism for ensuring the production of high quality, well-priced and innovative products and services. Failure by the Company to comply with antitrust and other trade regulation laws can result in serious consequences both for the Company and the offending individuals -- including significant civil and criminal penalties. Therefore, it is the Company's policy to compete solely on the basis of its superior and innovative products and services and to avoid improper actions that unreasonably restrain trade.

How can one determine what actions restrain trade or are otherwise improper?

This is normally a complex issue, which will depend on the structure of the market and a number of other factors. When in doubt as to the legality of any communication, action, arrangement or transaction, an Employee must contact his/her direct manager immediately.

What actions are prohibited

To avoid even the perception of unlawful conduct, Employees should avoid:

- (a) discussing prices, costs, production, products and services, bidding practices, other non-public business matters, territories, distribution channels or customers with a competitor; and
- (b) restricting the right of a customer to sell or lease a product or service at or above any price.

In addition, an advanced written approval of the CEO should be obtained prior to the entrance into any exclusive dealing arrangement with a customer (including a lessee) or supplier.

Insider Trading

Trading in the stock or securities of a company by a person who is aware of material, non-public information about that company may be considered “insider trading”. Information is “material” if a reasonable investor would consider such information important in a decision to buy, hold or sell the securities. Information is non-public until it has been broadly disclosed to the marketplace and the marketplace has had time to absorb the information. Examples of adequate disclosure include public filings with the U.S. Securities and Exchange Commission (the “SEC”) and the issuance of press releases.

Insider trading and the sharing of material, non-public information with any other person who then trades in securities or passes the information on further (called “tipping”) is illegal. The personal consequences of insider trading or tipping can be severe and include possible imprisonment and significant fines. Individuals who involve themselves in insider trading or tipping may be subject to immediate termination. The Company’s Insider Trading Policy is available on the Company’s intranet. You should carefully review the policy. If you have any doubts as to the propriety of any transaction, seek advice from the Company’s VP Legal Affairs and General Counsel before undertaking the sale or purchase of the Company’s publicly traded stock, bonds or other securities.

Inquiries from the Media and Public

We are committed to providing full, fair, and accurate disclosure in all public communications and in compliance with all applicable law, regulations, and rules.

Employees are not authorized to answer questions from the media, analysts, investors or any other members of the public. Upon receipt of any such inquiry, the Employee must immediately notify the Company’s CEO.

Corporate Responsibility and Social Awareness

Cellebrite’s activities shall be designed and implemented in a way that meets applicable international standards for maximizing energy efficiency and recycling efforts and minimizing material resource use and the release of pollutants.

The Company uses as much recyclable material as possible in all functions, customer relations, deployment, supply chain, offices, and facilities.

We expect our vendors, suppliers and consultants to comply with all environmental, health, and safety standards in the country in which they operate.

Quality

We are committed to providing high-quality products that customers and consumers can trust.

Employees should ensure that the Company’s products are safe, comply with applicable laws and regulations, and consistently meet or exceed product specifications and other Company standards. If an Employee is involved in the manufacture or production of products or has contact with the equipment or

materials used to produce them, he/she must follow all quality procedures and report any concerns about product safety immediately.

What should you do if you suspect that a supplier is not upholding its commitments to quality and safety?
Report this to your direct manager.

Accounting Practices, Books & Records and Record Retention



Accounting Practices, Books & Records and Record Retention

The Company fully and fairly discloses the financial condition of the Company in compliance with applicable accounting principles, laws, rules, and regulations. In reports and documents filed with or submitted to the U.S. Securities and Exchange Commission and other regulators by the Company, the Employees involved in the preparation of such reports and documents (including those who are involved in the preparation of financial or other reports and the information included in such reports and documents) shall make disclosures that are full, fair, accurate, timely and understandable. Honest and accurate recording and reporting of information is critical to our ability to make responsible business decisions.

The Company's accounting records are relied upon to produce reports for the Company's management, investors, governmental agencies, and others. Employees shall not knowingly falsify information, misrepresent material facts or omit material facts necessary to avoid misleading the Company's independent public auditors or investors. Employees shall never take any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors in the performance of their audit or review of the Company's financial statements.

All Employees and, in particular, the CEO, the CFO, the comptrollers and all bookkeepers, have a responsibility to ensure that the Company's accounting records do not contain any false or intentionally misleading entries.

Accurate recording of transactions

Our financial statements and books and records must accurately reflect all corporate transactions and conform to all legal and accounting requirements and, in particular:

- All accounting records, as well as reports produced from those records, are to be kept and presented in accordance with any applicable law;
- All records are to fairly and accurately reflect the transactions or occurrences to which they relate;
- All records are to fairly and accurately reflect, in reasonable detail, the Company's assets, liabilities, revenues and expenses;
- No accounting records are to contain any intentionally false or misleading entries;
- No transactions are to be misclassified as to accounts, departments or accounting periods;

- All transactions are to be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period;
- All accounting records are to comply with generally accepted accounting principles; and
- The Company's system of internal accounting controls, including compensation controls, must be monitored at all times.

Audits

Any effort to mislead or coerce an auditor, whether internal or independent, concerning issues related to the audit, accounting, or financial disclosure has serious legal consequences for the perpetrator, including criminal sanctions, and is strictly prohibited. If an Employee becomes aware of any violation of such policy under this Code, he/she must report the matter immediately to the Audit Committee.

Records Retention

Compliance with the Company's records retention procedures is mandatory. Destroying or altering a document with the intent to impair the document's integrity or availability for use in any potential official proceeding is a crime. Prior to the destruction of any corporate record, Employees must consult an appropriate manager to ensure compliance with these policies. Documents relevant to any pending, threatened, or anticipated litigation, investigation, or audit shall not be destroyed for any reason. Any concern that Company records are being improperly altered or destroyed should be reported to a responsible manager or the appropriate internal authority of the Chief Financial Officer.

Compensation and reimbursement records

All Employees should accurately and truthfully complete all records used to determine compensation or expense reimbursement. This includes, among other items, reporting of hours worked with respect to the Company (including overtime), reimbursable expenses (including travel and meals), and sales activity.

Compliance with Laws, Rules and Regulations

All Employees must respect and comply with all applicable laws, rules and regulations of the United States and other countries, states, counties, cities and other jurisdictions in which the Company conducts business.

Violations of this Code

Violations of this Code may result in suspension of work duties (including without pay or benefits), a written letter of reprimand, diminution of responsibilities or demotion, disgorgement, and termination of employment, among other actions.

This Code is in addition to any Company policies and procedures already in place and communicated to Company Employees. Any waivers of this Code may be made only by the Company's Board of Directors and will be promptly disclosed as and when required by law or stock exchange regulation.

This Code establishes principles for business conduct applicable throughout the Company and its subsidiaries, regardless of the location. Where differences exist on any particular question as a result of local customs, cultures or laws, Employees must apply either the Code or local requirements—whichever sets the highest standard of behavior with respect to that question.

Duty to Report Violations

Each Employee is responsible for promptly reporting to the Company any circumstances that such person believes in good faith may constitute a violation of this Code, or any other Company policy, or applicable law, regulations and rules and follow the “Whistleblower Policy.” Employees should also report any alleged retaliation against employees and other persons who make, in good faith, reports for the above-mentioned violations. Reporting your concern is consistent with good ethics and corporate responsibility, and is in all our interests.

Employees may report suspected violations of this Code directly to their direct managers in an open door discussion or, if an employee believes that his/her direct manager is involved or has a conflict of interest, with the next level(s) of management. Alternatively, suspected violations of this Code may be reported openly or confidentially and/or anonymously to the Company’s Chief People and Corporate Development Officer or Audit Committee by doing as follows: (i) emailing We.Care@Cellebrite.com, Attention: Chief People Officer and Corporate Development Officer or Audit Committee; (ii) calling the Company-provided hotline at +972-76-53003; or (iii) writing a letter to Cellebrite DI Ltd., 94 Shlomo Shmelzer Rd., Petah Tikva 4970602, P.O.B 3925, Israel, Attention: Chief People and Corporate Development Officer or Audit Committee.

Receipt and processing of suspected violations will comply with all applicable data protection and other laws. The Chief People and Corporate Development Officer will review the contents at least once a week and acknowledge receipt of the report to the submitting individual (if possible) within one week of receipt. In the event that the complaint pertains to the Chief People and Corporate Development Officer or he/she is likely to have a personal interest in it, then the Chairperson of the Audit Committee shall assume all of the Chief People and Corporate Development Officer’s roles and responsibilities under this Code. Reports of suspected violations will be treated the same as complaints under the Company’s Whistleblower Policy. For more information, see the Whistleblower Policy.

It is important for the Company to create an open, transparent and safe working environment where Employees feel able to speak up. The Company will take measures to protect the confidentiality of any report made, subject to applicable law, regulation or legal proceedings. It is the policy of the Company to protect those who communicate concerns in good faith from any retaliation for such reporting. No retaliation against any individual who reports violations of this Code in good faith will be permitted. While self-reporting a violation will not excuse the violation itself, the manner in which the report was made will be considered in determining any appropriate sanction, including dismissal. The Company will investigate any matter which is reported and will take any appropriate corrective action. For more information, see the Whistleblower Policy.

Approved:



Yossi Carmil
CEO

Last update: August 5th , 2021