mimecast

WORK PROTECTED.

FY27

CODE OF BUSINESS CONDUCT AND ETHICS

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Message from our CEO



Ranjan Singh

CHIEF EXECUTIVE OFFICER

Mimecasters,

Our shared mission is to ensure the security and resilience of the organizations that trust us. That trust is earned through the outcomes we deliver, every day, for our company, our customers, and each other.

Accountability is how we get there. Each of us owns our commitments and follows through on them. When we hold ourselves accountable, we move faster toward our North Star and deliver the results our customers depend on.

Our full potential can only be met if we all maintain the highest level of integrity and ethical standards. We have a personal responsibility to deal responsibility to deal honestly and fairly with our customers, prospects, partners, competitors, and each other. This commitment to integrity is core to integrity is core to who we are as a company.

Alongside our core company values, the Code of Business Conduct and Ethics gives us the tools to make the right decisions and to keep our focus on to keep our focus on driving outcomes the right way.

All Mimecasters have an individual and corporate responsibility to uphold our Code. Please familiarize yourself with it in its entirety and incorporate entirety and incorporate it into your daily business activities.

Sincerely,

Ranjan Singh

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Why This Matters

Mimecast is committed to:

- Upholding Mimecast's Core Values;
- Promoting the health, safety, and wellbeing of Mimecasters;
- Enabling Mimecasters to use their best judgment and common sense when making decisions;
- Maintaining the reputation of Mimecast and our business practices; and
- Providing clear expectations of our Mimecasters and third parties.

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OUR ACTIONS AS MIMECASTERS PROMOTE INTEGRITY FOR OUR COMPANY, THIRD PARTIES WITH WHOM WE DO BUSINESS, AND EACH OTHER.

Mimecast is committed to compliance with all applicable laws and regulations in the UK, the U.S., and everywhere else we do business. To support this effort, Mimecasters are committed to compliance with this Code of Business Conduct and Ethics (the "Code"), as well as our other corporate policies. If there is uncertainty about how the Code's provisions or our other policies translate into behavior, don't guess. Use the Compliance Decision Tree on the next slide. Alternatively, ask our Compliance Office, Legal, your HR Partner, or your manager.



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Compliance Decision Tree

ASK FOR HELP

Contact:

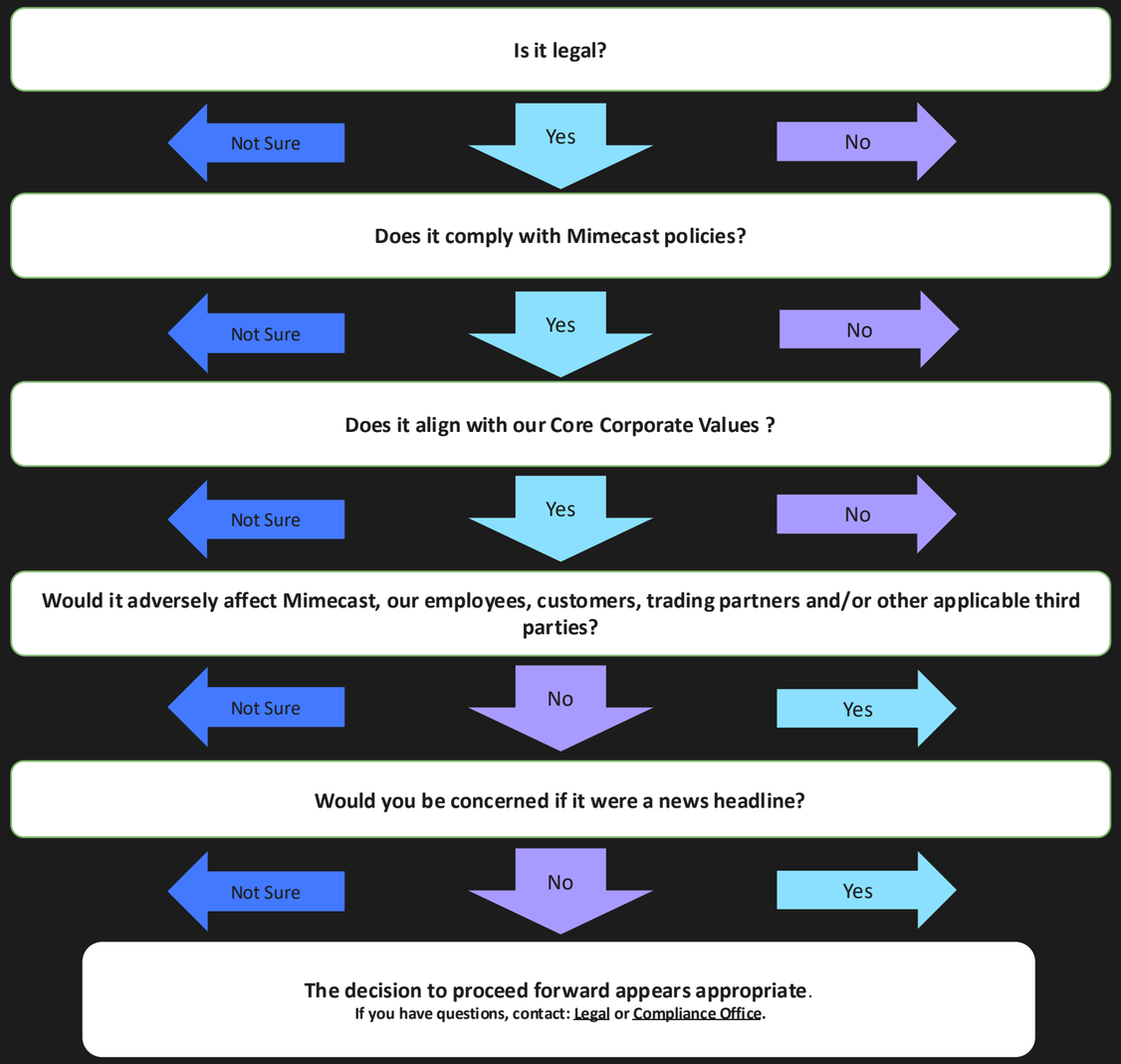
Legal

Or

Compliance Office

Or

Your manager



STOP

Do not proceed.
There may be serious consequences for this action.

Contact:

Legal

Or

Compliance Office

Mimecaster Responsibilities

- Follow all applicable laws and regulations;
- Read and understand the Code;
- Speak up if you have a concern or suspect any violations with our policies (See section 'Seek Guidance & Report Guidance & Report Suspected Violations');
- As coordinated with the Compliance Office, cooperate with any investigations; and
- Seek guidance if you are unsure about Mimecast's policies.

SEEK GUIDANCE

Legal

Compliance Office

Your HR Partner

Your manager

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TOGETHER WE DELIGHT

- USE SOUND JUDGMENT IN MIMECAST'S FINANCIAL OPERATIONS
- RESPONSIBLE USE OF GIFTS AND ENTERTAINMENT
- PROHIBIT INSIDER TRADING

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Use Sound Judgment in Mimecast's Financial Operations

Mimecasters must comply with all financial reporting and accounting regulations applicable to our business. Our principal executive, financial, and accounting officers will use reasonable judgment and perform their responsibilities honestly, ethically, and objectively to ensure that we comply with these regulatory obligations. We must further cooperate with our internal and external auditors with respect to financial reporting matters.

We must maintain all necessary records, files, and accounts to fully and accurately accurately reflect corporate transactions and the acquisition, maintenance, and maintenance, and disposition of Mimecast's assets in accordance with generally generally accepted accounting principles and our accounting policies.

We must immediately report to Mimecast using one of the identified mechanisms mechanisms any errors or misstatements with respect to the same.

We must clearly identify accounts, and we will not create or maintain secret or secret or unrecorded funds or assets.

Mimecasters must use standard agreements and contract processes that reflect the actual deal we enter into. Non-standard terms must be reviewed by Legal and by Legal and approved by the commercial Finance team prior to entering into contractual commitments. We are prohibited from making side agreements or agreements or arrangements with anyone.

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Use Sound Judgment in Mimecast's Financial Operations

We must follow our Global Travel and Expense Reporting Policy and not commit fraud, make false, misleading, or fictitious entries, or list fictitious expenses on expense accounts or petty cash vouchers.

We must not make any payment on behalf of Mimecast without adequate supporting documents, and we must not make any payments for any purpose other than what is set forth in the authorizing documentation.

As a private company, we must not share financial or other performance information about Mimecast with unauthorized third parties without prior written approval from our Chief Financial Officer.

We must provide full, fair, accurate, timely, and understandable disclosure in all reports and documents and in public communications we make, including statements we make about Mimecast's solutions.

QUESTIONS?

Travel and Expense Hub

Legal

Compliance Office



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Responsible Use of Gifts and Entertainment

We value our relationships with customers, trading partners, and vendors. Building those relationships and creating goodwill might include meals, gifts, and entertainment (but never cash). It is important that giving or receiving anything of value is appropriate and reasonable in the circumstance and does not violate applicable laws and at all times complies with our Global Travel and Expense Reporting Policy.

Gifts and entertainment must never be given to individuals who are not permitted to accept them by applicable law, regulations, or by regulations, or by policies applicable to them.

Giving anything of value to a UK, U.S., or other government official is strictly regulated and, in many cases, prohibited by law. Mimecasters must obtain approval from our Compliance Office before providing anything of value to a government official.

Who is considered a government official?

Any officer or employee of a government or governmental department or agency, or of a public organization. They can also be a person acting in an official capacity for or on behalf of a government, governmental department or agency, or of a public organization.

MORE INFORMATION

Global Travel and Expense
Expense Reporting Policy

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Prohibit Insider Trading

As part of who we are and our transparent management philosophy, Mimecasters may have access to material, non-public information about our customers, partners, and other entities with whom we do business. Mimecasters must not use or share this information about any company conducting business with Mimecast for financial gain until it becomes public or is no longer material.

This obligation extends to members of our households (e.g., our spouse, significant other, child, parent, or other family member living in the same household).

What's "material, non-public information"?

It's information that a reasonable investor would consider important in important in making a decision to buy buy or sell company stock (e.g., mergers or acquisitions, new products, products, changes in senior executive executive management, non-public public information on financial or company performance).

MORE INFORMATION

Insider Trading Policy

QUESTIONS? CONTACT:

Compliance Office

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TOGETHER WE COLLABORATE

- COMMITMENT TO WORKPLACE SAFETY
SAFETY
- COMMITMENT TO INCLUSION AND BELONGING
- MINDFULNESS IN SOCIAL MEDIA USE
- INVOLVEMENT WITH CIVIC ACTIVITIES
- BUILD A HEALTHY CULTURE
- COMMITMENT TO THE ENVIRONMENT, SOCIAL, AND GOVERNANCE FRAMEWORK

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Commitment to Workplace Safety

Mimecasters are dedicated to maintaining a safe and violence-free workplace. At no time are we permitted to intimidate or threaten physical violence or carry a weapon of any kind into the office or to any Mimecast-sponsored meetings or functions, including those with Mimecast customers, trading partners, or vendors.

QUESTIONS? CONTACT:

Human Resources

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Commitment to Inclusion and Belonging

We treat each other with respect. Mimecast is committed to providing a work environment that is free of discrimination and harassment and seeks to prevent it. prevent it.

In our Equal Employment and Anti-Discrimination Policies , we provide equal opportunity employment and do not discriminate. We maintain a strict policy prohibiting prohibiting unlawful discrimination, harassment, and sexual harassment against both against both applicants and Mimecasters and prohibit such conduct even if it does not does not rise to the level of being unlawful.

We prohibit discrimination and harassment in the workplace based on any legally protected characteristic, including without limitation:

race or color;

religion;

sex or gender (including pregnancy, lactation, childbirth, or related related medical conditions);

gender identity or expression;

sexual orientation;

age;

national origin or ancestry;

physical or mental disability;

genetic information (including testing and characteristics);

veteran status or uniformed servicemember status; or

any other status protected by laws wherever we have employees.

MORE INFORMATION

Equal Employment and Anti-Discrimination Policy

Equal Employment and Anti-Discrimination Policy - Australia

QUESTIONS? CONTACT:

Your HR Partner

Compliance Office

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Mindfulness in Social Media Use

- When sharing Mimecast-related content, follow requirements published by Marketing.
- Be mindful that your profile and any content you post are consistent with the professional image you present to clients and colleagues, particularly if you are "connected" with them.
- If your social profiles or posts identify you as Mimecast employee, make it clear that your personal posts are on your own opinions. own opinions.
- Be aware that you are personally responsible for all communications you post.
- Mimecast prohibits racism, bigotry, misogyny, express or implied threats of harassment or physical harm, and/or hate speech in the workplace.

What if a Mimecaster receives a a request for quotes or posts?

Internal Communications

MORE INFORMATION

Social Media Guidelines

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Build a Healthy Culture

In our commitment to make Mimecast the place that we do our best work, best teamwork, and greatest learning, Mimecasters should at all times promote a respectful workplace where we have the ability to reach our fullest potential.

We strive to create a workplace that actively promotes mental, physical, and emotional wellbeing, requires appropriate and responsible alcohol use, and is free from influence of illicit drugs.

Involvement with Civic Activities

We encourage Mimecasters to participate lawfully and respectfully in respectfully in civic and political activities. However, these activities must activities must be conducted on our own time and must not use any any Mimecast facilities or assets, including funds for political contributions of any kind.

Mimecasters are not permitted to represent that a political contribution was made on behalf of Mimecast.

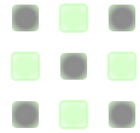
What if a third party asks for a a contribution to their charity? charity?

CONTACT:

Employee Engagement

MORE INFORMATION

Global Illicit Drug and Alcohol Policy



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Commitment to the Environment, Social, and Governance Framework

Mimecasters recognize that our commitment to global community resilience must go hand in hand with an equally strong dedication to protecting our environment and natural resources. We are actively investing in and exploring ways to reduce our carbon footprint and have adopted various energy efficiency measures across our facilities. We are committed to complying with applicable environmental laws and regulations, including those related to recycling and waste disposal. We also expect third parties with which we partner to share these commitments and uphold similar principles.

At Mimecast, we take pride in supporting the communities where we work and live. While we relentlessly innovate through cloud technology to deliver cyber resilience that is cyber resilience that is cost-effective, simple, and comprehensive, we also strive to build resilience in the world around us. This commitment is reflected in our corporate in our corporate donations, employee gift-matching programs, and volunteer initiatives.

Our dedication to ethical practices is published in our Modern Slavery Act Disclosure Statement which demonstrates our commitment to supporting and promoting human rights within our supply chain and in the communities we serve. Mimecast has implemented key governance policies that reflect our dedication to fostering resilience in our global community, both through our cybersecurity solutions and our commitment to environmental and social responsibility.

MORE INFORMATION

Environmental, Social, and Governance Report

QUESTIONS? CONTACT:

ESG Council

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TOGETHER WE INNOVATE

- RESPONSIBLE AND ETHICAL USE OF ARTIFICIAL INTELLIGENCE
- PROTECT INTELLECTUAL PROPERTY
- MAINTAIN CONFIDENTIALITY

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TOGETHER WE INNOVATE

Responsible and Ethical Use of Artificial Intelligence

At Mimecast, innovation is essential to deliver value to our customers and stay ahead of the evolving cybersecurity landscape. To accelerate our innovation, we are committed to leveraging the transformative power of Artificial Intelligence ("AI") across every part of our business. AI not only strengthens our services to protect against external cyber-threats but also plays a crucial role in our customer's internal human risk management.

Using AI is essential in driving better customer outcomes by enabling more efficient and effective experiences. At the same time, AI plays a same time, AI plays a critical role in improving Mimecast operational efficiencies, streamlining processes, and boosting productivity. productivity.

Consistent with our AI Trusted Development Pledge and our Guidelines for the Responsible Use of AI , we are committed to leveraging AI committed to leveraging AI responsibly and ethically. All Mimecasters are expected to adhere to these principles so that AI is used in ways AI is used in ways that are transparent, fair, unbiased, and aligned with our core values.

QUESTIONS? CONTACT:

AI Governance Committee

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Protect Intellectual Property

Mimecast's intellectual property (e.g., our trademarks, logos, copyrights, trade secrets, "know-how", and patents) are among our most prized assets. Mimecasters know that any unauthorized use of our intellectual property can lead to their loss of value. We must respect intellectual property laws, including laws governing our patents, copyrights, and trademarks, and look to safeguard Mimecast's intellectual property against infringement and misappropriation.

Mimecasters must respect the intellectual property rights of others, including rights of former employers. We must always cooperate with our Legal team to preserve all applicable intellectual property rights.

Maintain Confidentiality

Mimecasters must honor our confidentiality obligations in our agreements with Mimecast and with our customers, trading partners, partners, and vendors, as well as under applicable law. When joining joining Mimecast and throughout our careers, Mimecasters must not must not disclose any misappropriated confidential information from information from former employers or any other third party. While While working here, we must use sound judgment in safeguarding, safeguarding, using, and disclosing confidential information of of Mimecast and of any other party where confidentiality agreements agreements are in place, or such information is protected by applicable applicable law. When we depart Mimecast, we must leave well and not and not take any confidential information of Mimecast or any customer, customer, trading partner, or vendor with us.

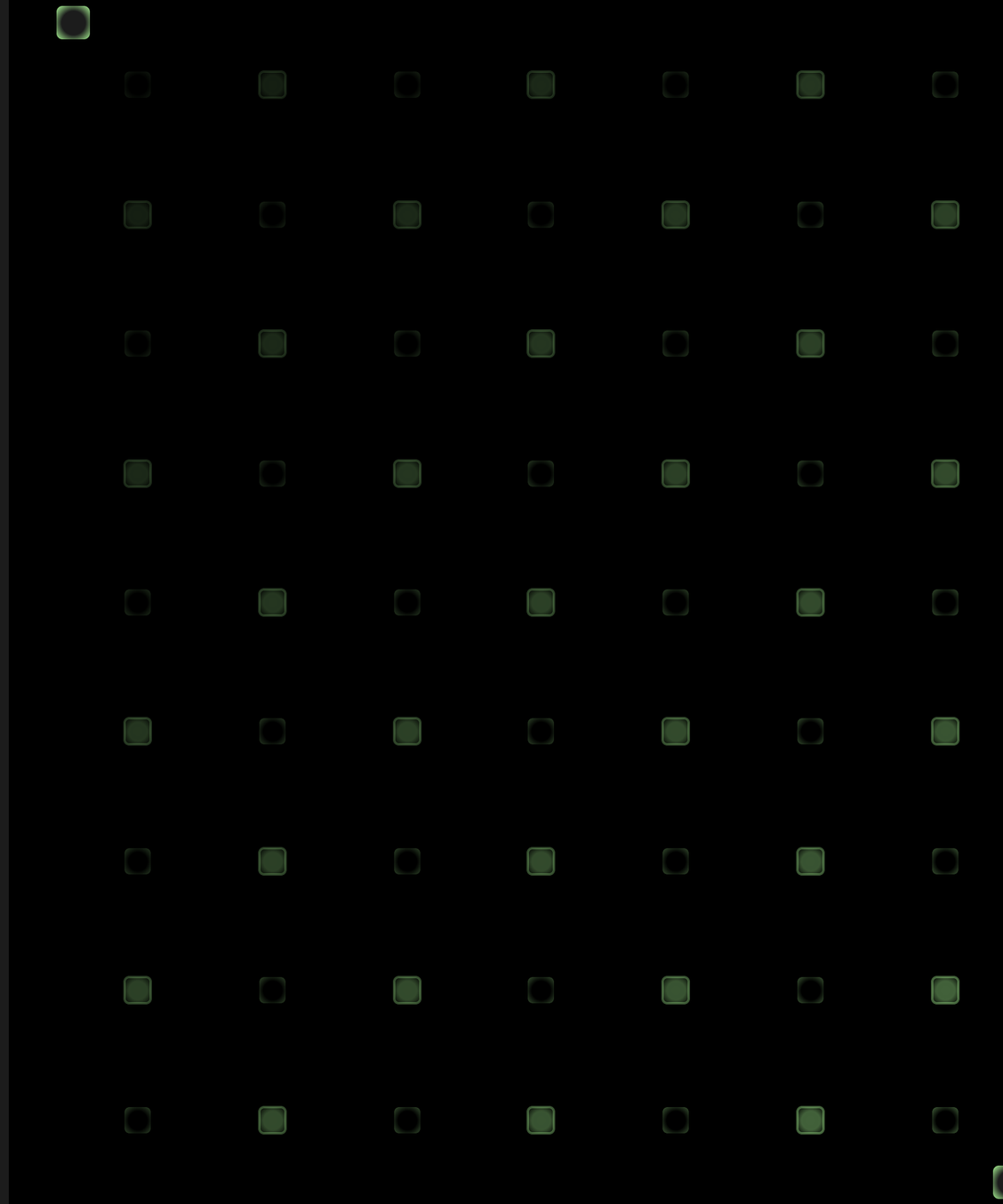
QUESTIONS? CONTACT:

Legal

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TOGETHER WE DELIVER

- PROTECT CORPORATE OPPORTUNITIES AND ASSETS
- PROTECT PERSONAL DATA
- NO OUTSIDE EMPLOYMENT
  EMPLOYMENT
- AVOID CONFLICTS OF INTEREST



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Protect Corporate Opportunities and Assets

We owe a duty of loyalty to Mimecast to always advance its legitimate business interests. Mimecasters are prohibited from diverting to themselves or to others any opportunities that are discovered through the use of Mimecast's property or information, or as a result of their position with Mimecast, for improper personal gain or competing with Mimecast.

As the stewards of proprietary and confidential information of Mimecast and our third parties third parties with whom we conduct business, as well as the personal data of our employees, employees, applicants, customers, trading partners, and vendors, we work every day to day to safeguard these assets that make us a leader in cyber resilience.

QUESTIONS? CONTACT:

Compliance Office

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Protect Personal Data

Mimecast is committed to the lawful and secure collection, processing, and storage of storage of personal data that is entrusted to us by our customers, applicants, and our applicants, and our employees, as is required by the EU GDPR, UK GDPR, CCPA and CCPA and other applicable data privacy regulations worldwide.

When handling personal data as part of our responsibilities with Mimecast, we must ensure that we are following the appropriate safeguards that Mimecast has implemented to ensure the protection of such data.

Mimecasters must not collect or otherwise process personal data unless required by our individual roles and there is a valid legal basis to do so, including but not limited to appropriate consent.

We must maintain the confidentiality of personal data that is processed, accessed, or accessed, or used and must not share it with any other individuals that do not have the not have the appropriate authorization.

We must use personal data for only for the purpose for which it was initially collected, as disclosed in our contractual terms, and/or as permitted by applicable law.

NOTE: PROFESSIONAL SECRECY OBLIGATION UNDER GERMAN LAW

During the performance of our work, Mimecasters may process confidential information subject to professional secrecy under Sec. 203 of the German Criminal Criminal Code (Strafgesetzbuch - "StGB"). Accordingly, Mimecasters may be subject to subject to the same secrecy obligations as a person with professional secrets. A secrets. A "professional secret" means any information, in particular a secret relating relating to a person's personal sphere of life or to a business or trade secret which was which was revealed or otherwise made known to a person subject to professional professional secrecy under Sec. 203 StGB (e.g., physicians, professional psychologists, psychologists, lawyers, state recognized social workers).

Mimecasters participating in the occupational duties of a person with professional professional secrets may be liable to prosecution pursuant to Sec. 203 StGB, if they StGB, if they disclose, without authorization, a professional secret that they learned in learned in the course of performing their duties. This also applies to interrogations or interrogations or questioning by courts, public prosecutors, police departments or departments or other authorities. Against this background, we acknowledge that it is acknowledge that it is strictly forbidden to disclose professional secrets to third third parties.

What is personal data?

Any information relating to an identified or identifiable person such as a name, telephone number, email address, or IP address. It can also include more sensitive information such as a social security number or national ID, banking information, employment record, sexual orientation, race, or family status.

QUESTIONS? CONTACT:

Compliance Office

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Avoid Conflicts of Interest

We are always responsible for acting in the best interests of Mimecast. To uphold our reputation for integrity, Mimecasters must avoid situations that create actual or perceived conflicts of interest between our personal interests (including members of our families or close friends) and the best interests of Mimecast or any of our customers, trading partners, or vendors. We must not engage in any business or personal relationships with anyone in our reporting chain, including but not limited to, renting property, borrowing, or lending money. As always, when in doubt, ask.

If there is a possibility that an actual or perceived conflict of interest may exist, it should be reported promptly to our Compliance Office or your HRBP.

Mimecast's General Counsel may notify the Board of Directors of Mimecast Holding Limited, the parent company of the Mimecast Group, regarding any actual or potential conflicts of interest, depending on the facts and circumstances.

Any actual or potential conflict of interest involving a member of the Board of Directors, Directors, an executive officer, or member of our Legal team must be disclosed to the disclosed to the Board of Directors.

No Outside Employment

Mimecasters know that we should not engage in any any outside work that could interfere with Mimecast's Mimecast's business interests or violate any employment obligations that apply to us.

QUESTIONS? CONTACT:

Compliance Office

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TOGETHER WE ACT

- COMPLY WITH ANTI-BRIBERY AND ANTI-CORRUPTION LAWS
- ADHERE TO INTERNATIONAL TRADE CONTROLS
- FOLLOW COMPETITION AND ANTI-TRUST REQUIREMENTS
- SEEK GUIDANCE & REPORT SUSPECTED VIOLATIONS
- DISCIPLINARY ACTION
- PARTICIPATE IN INVESTIGATIONS
- PROHIBITION ON RETALIATION AND VICTIMIZATION

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Comply with Anti-Bribery and Anti-Corruption Laws

We pride ourselves on selling our solutions based on their merits and we hold ourselves to high standards when dealing with our prospects and customers. Mimecasters are prohibited from offering anything of value that could be perceived as a bribe to win business. In all cases, we will decline any business opportunity that is tied to the perception of improper influence to close a deal.

Mimecast requires strict adherence to the requirements of the UK Bribery Act Bribery Act 2010, U.S. Foreign Corrupt Practices Act, South Africa's Prevention and Prevention and Combating of Corrupt Activities Act, and any other local laws in local laws in the areas where Mimecast conducts business.

Adhere to International Trade Controls

Mimecasters must comply with U.S. and international trade laws that govern govern where Mimecast can sell its solutions, including prohibitions on selling into selling into certain countries and to certain restricted parties. Compliance is Compliance is required even if it may result in the loss of business opportunities. opportunities. We will work with Legal to support our international trade trade compliance obligations, especially as we move into new markets.

MORE INFORMATION

Global Anti-Bribery and Anti-Anti-Corruption Policy

QUESTIONS? CONTACT:

Legal

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Follow Competition and Anti-Trust Requirements

Competition, anti-trust, and other similar laws are designed to promote a fair market for all participants and is beneficial to our customers. While Mimecast will always compete vigorously, we will always compete ethically and fairly and in compliance with these laws in the UK, U.S., and anywhere else we conduct business. Mimecast will never enter into anti-competitive agreements with competitors and others around fixing or controlling prices, bid-rigging, non-solicitation of each other's employees, dividing markets, or other impermissible arrangements. Mimecast will never take unfair advantage of another entity in business dealings on Mimecast's behalf through the abuse of privileged or confidential information, improper manipulation, concealment, or misrepresentation of material facts. In addition, we will not participate in unfair and deceptive trade practices in promoting our solutions, especially with respect to misleading or false claims about competitors and their solutions.

QUESTIONS? CONTACT:

Legal

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Seek Guidance & Report Suspected Violations

Mimecast is committed to the highest standards of openness and accountability. As part of our Whistleblower Whistleblower Policies , Mimecasters are expected to report concerns or suspected violations of this Code or this Code or other Mimecast policies as soon as we become aware of them. We are encouraged to contact our to contact our HR Partner or direct manager, if that is a comfortable option. We can also contact our our Compliance Office or our Legal team.

Certain methods of communications can be anonymous. Mimecast's Compliance Office manages all inquiries and inquiries and strives to maintain confidentiality to the extent permitted by applicable law.

Mimecasters must not use these reporting channels in bad faith or in a false or unreasonable manner. In addition, we will not use the Reporting Hotline to report grievances that do not involve this Code or other ethics-related issues.

MORE INFORMATION

Global Whistleblower Policy

Whistleblower Policy - Australia

To raise concerns to our Compliance Office, Mimecast offers the following methods:

- **By writing via U.S. or international mail to:**
  Chief Compliance Officer c/o Mimecast North America, Inc. 191 Spring Street Lexington, MA 02421 USA (may be anonymous)

- **By phoning, texting, or making an online report:**
  Mimecast Reporting Hotline (may be anonymous)

- **By emailing:**
  Compliance Office (anonymity may not be maintained)

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Disciplinary Action

Mimecast's management shall take reasonable steps to: (i) monitor and audit compliance with this Code, including the establishment of monitoring and auditing systems that are reasonably designed to investigate and detect conduct in violation of this Code; and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of this Code. Disciplinary measures for violations of this Code will be determined at Mimecast's sole discretion and may include, but are not limited to, counseling, oral or written warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution. Mimecast's management may periodically report to the Board of Directors of Mimecast Holding Company Limited on these compliance efforts including, without limitation, periodic reporting of alleged violations of this Code and the actions taken with respect to any such violation.

Participate in Investigations

Mimecast's Compliance Office coordinates investigations of suspected violations of this Code or our other policies or procedures, or any applicable law or regulation. Mimecast Legal, Human Resources, Security, IT, and other functions may participate in any investigation as may be necessary.

Mimecasters always cooperate with Mimecast in any investigation.

Mimecasters can always contact our General Counsel with any concerns around any investigation or its outcome.

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Prohibition on Retaliation and Victimization

As part of our Whistleblower Policies , Mimecast expressly forbids any retaliation against any Mimecaster who, acting in good faith on the basis of a reasonable belief, reports any suspected misconduct or participates in an investigation of a possible violation of this Code, other policies or procedures, or any applicable law, rule, or regulation. Any person who participates in any such retaliation is subject to disciplinary action, up to and including termination. Contact our Compliance Office immediately with any concerns around retaliation and victimization.

Individuals must not suffer any detrimental treatment as a result of raising a concern in good concern in good faith.

MORE INFORMATION

Global Whistleblower Policy

Whistleblower Policy - Australia

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Waivers

While some of the policies in this Code must be strictly adhered to and no exceptions are permitted, in other cases exceptions may be possible. Requests for waivers of any part of the Code must be submitted to our Compliance Office and approved by Mimecast's General Counsel and Chief Human Resources Officer. Waivers requested by executive officers or members of the Board of Directors must be submitted to our Compliance Officer and General Counsel and must also be approved by the Board of Directors.

Review

The Code is subject to approval by Mimecast's General Counsel, Chief Compliance Officer, and Officer, and Chief Human Resources Officer. This Code is also reviewed by the Board of Directors of Directors of Mimecast Holding Company Limited.

Review is conducted in response to significant changes in Mimecast's business practices or applicable law and regulations, and amendments may be made to ensure this Code remains current with Mimecast's strategy and business objectives and applicable law.

- [ ] This Code is required to be read and acknowledged annually by all Mimecasters. Electronic affirmation confirms that the Code has been read and understood and that there is agreement to comply with the Code.

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