

# COMMTOUCH CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

## 1.0 SCOPE

The provisions of this Code of Ethics herein are applicable to Senior Financial Officers, i.e. CEO, principal financial officer, controller, principal accounting officer and the like of Commtouch Software Ltd. (hereinafter "Commtouch" or "Company").

Wholly owned subsidiary companies of Commtouch are encouraged likewise to adopt this Code of Ethics, mutatis mutandis.

## 2.0 POLICY STATEMENT

Each Commtouch Senior Financial Officer must observe the highest ethical standards and exercise proper judgment in all financial reporting and business dealings. In particular, each such individual shall:

- Be honest and ethical, and act in good faith, in all business dealings on behalf of the Company, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, and comply with Commtouch's Code of Business Conduct.
- Have a good working knowledge of the rules and regulations governing the accounting for and reporting of all financial and business matters/transactions of the Company.
- Respect and maintain the confidentiality of information acquired in the course of one's work, except when specifically authorized or legally obligated to disclose such information.
- Act to provide full, fair, accurate, timely and understandable disclosures in reports and documents, including those filed with the Securities and Exchange Commission and in other communications.
- Endeavor to periodically attend continuing education seminars and courses for their chosen field.
- Follow all applicable rules and regulations in performing their accounting and finance duties for the Company.
- In case of doubt or uncertainty in the handling of any accounting or finance matter, endeavor to seek independent counsel from a qualified third party.
- Refrain from accepting instructions from those who are not qualified to make determinations in regards to the treatment of an accounting or finance issue.
- Reject any attempt by a third party to unduly influence any Senior Financial Officer in the performance of his/her duties, and report said attempt to the CEO, General Counsel, Board of Directors and/or Audit Committee.
- Maintain periodic contact with the Audit Committee of the Company, and divulge to the Audit Committee, as soon as reasonably practical, any unusual accounting or finance issues arising outside the normal course of business.
- Be truthful and forthcoming during any formal or informal investigation of matters relating to the accounting or finance practices and procedures of the Company.
- Refrain from taking any action to fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant or independent internal auditor engaged in the performance of an audit of the financial statements of the Company for the purpose of rendering such financial statements materially misleading or for any other improper purpose.
- Establish and maintain internal controls.
- Investigate and divulge to the appropriate Company entity (i.e. CEO, General Counsel, Board of Directors and/or Audit Committee) in a timely manner any reports of misapplication of Company or governmental policies, rules and procedures which may have a deleterious effect on the financial condition or statements of the Company.