

Code of Conduct

To ensure safety and security and provide the best possible work environment, Abnormal AI, Inc. (the “Company”) expects employees to follow basic, common-sense rules of conduct that will protect everyone’s interests and safety. The Code of Conduct (the “Code”) applies to all employees, including full-time, part-time and contractor staff employed at every seniority level. The Code is to be upheld during all professional functions and events, including but not limited to business hours at the Company office, during Company-related extracurricular activities and events, while attending conferences and other professional events on behalf of the Company, and while working remotely and communicating on Company resources with other employees.

We expect all employees to abide by this Code in all business matters - online and in-person - as well as in all one-on-one communications with customers and staff pertaining to Company business.

This Code also applies to unacceptable behavior occurring outside the scope of business activities when such behavior has the potential to adversely affect the safety and well-being of employees and clients.

Our Commitment to Conduct

Acceptable Behavior

- Participating in an authentic and active way.
- Contributing to the health and longevity of others.
- Maintaining a safe and secure work environment.
- Exercising consideration and respect in speech and actions.
- Attempting collaboration before creating conflict.
- Refraining from demeaning, discriminatory, or harassing behavior and speech.
- Being mindful of your surroundings and of your fellow participants.
- Alerting Company leaders in a timely manner if a dangerous situation presents itself or someone appears to be in distress.
- Reporting suspected violations of this Code of Conduct, even if they seem inconsequential.
- Reporting any suspected information security policy infraction, including witnessing an employee, vendor or partner attempting to circumvent a security control.
- Being respectful toward all patrons or customers when you attend events on behalf of the Company.

The above list of Acceptable Behavior does not require an employee to tolerate behavior, by other employees or third parties such as customers, that violates our Equal Employment Opportunity, Sexual and Other Unlawful Harassment, or Anti-Retaliation policies. If an employee or third party engages in behavior that violates any of these policies, employees should follow the reporting procedures outlined in the relevant policy.

Unacceptable Behavior

It is not possible to list all the forms of behavior that are considered unacceptable as an employee, but the following are examples of infractions of rules of conduct that may result in disciplinary action, including suspension, demotion or termination of employment:

- Falsification of employment records, employment information, time-keeping or other records;
- Recording the work time of another employee, allowing any employee to record another employee’s work time, or allowing falsification of any time card, whether yours or another employee;
- Theft or the deliberate or careless damage of any Company property or the property of any employee or client;
- Use of Company materials, supplies, technology resources, tools or products for personal reasons without advanced permission from management;
- Using unlicensed or otherwise illegally obtained software programs or services;
- Circumventing, or attempting to circumvent, any information security control or physical security control;

- Unauthorized access (or exceeding authorized access) to any Company information, computing system or other resource;
- Abuse of the Company's technology resources, including sending personal electronic messages (e.g., email, chat, text, etc.) during working time or in a manner that interferes with the employee's work performance;
- Possessing, distributing, selling, transferring or using or being under the influence of alcohol or illegal drugs in the workplace or during working hours;
- Provoking a physical fight or engaging in physical fighting during working hours or on premises owned or occupied by the Company;
- Carrying firearms, weapons or dangerous substances at any time, on premises owned or occupied by the Company, unless state law provides otherwise. Note: This prohibition applies only to the extent allowed by applicable state law. In those states that specifically give the employee the right to maintain a lawfully possessed firearm in a locked vehicle in the employer's parking lot, employees will be permitted to maintain a firearm in their own locked vehicle in compliance with the law. Under those circumstances, employees are strictly prohibited from removing the firearm from their vehicle or carrying it on their person or into a building.
- Using abusive, violent, threatening or vulgar language at any time during working hours, while on premises owned or occupied by the Company, during online ("virtual") Company meetings or events, via any Company messaging or communications system, etc.;
- Absence of three (3) consecutive scheduled workdays without prior notice to the Company (in which case the Company may assume the employee has abandoned the role and therefore resigned);
- Failing to obtain permission to leave work during normal working hours;
- Failing to observe working schedules, including meal and rest breaks;
- Abusing or misusing paid sick leave (note: for employees subject to mandatory sick leave laws, the provisions of the applicable policy govern sick leave issues);
- Failing to provide a certificate from a health care provider when requested or required to do so in accordance with applicable law;
- Working overtime without authorization or refusing to work assigned hours;
- Violating any safety, health or security policy, rule or procedure of the Company; and
- Committing a fraudulent act or intentional breach of trust under any circumstances.

Unacceptable behavior from any employee, including those with decision-making authority, will not be tolerated. Anyone asked to stop unacceptable behavior is expected to comply immediately. If an employee engages in unacceptable behavior, Company leadership may take any action deemed appropriate, up to and including suspension or termination.

Speaking Up: Reporting Violations & Non-Retaliation

Reporting Violations

Employees can submit their good faith questions or concerns about conduct they believe may violate our Code, our policies or the laws and regulations under which we do business to:

- Their manager
- Any Company leader
- People Operations
- Legal / Compliance

When an employee raises a concern, the Company will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review.

When raising concerns, we ask that employees provide as much detailed information as possible, including the background and history of the concern, names, dates and places where possible, and the reasons why the situation is cause for concern. This is especially important for concerns raised anonymously, so that the Company may conduct an appropriate review and if necessary, begin an investigation.

Non-Retaliation

It is a violation of this policy to retaliate against any person for making a complaint of unacceptable behavior or against any person for participating in the investigation of (including testifying as a witness to) any such allegation. Any retaliation or intimidation may be subject to punitive action up to and including termination.

Right to Report to Government Agencies

Nothing in this Code, or in any Company policy or agreement, restricts or is intended to restrict any employee's right to communicate directly with, report a possible violation of law to, or otherwise provide truthful information to any federal, state, or local government agency or self-regulatory organization (including the U.S. Securities and Exchange Commission, the Equal Employment Opportunity Commission, the Occupational Safety and Health Administration, or the National Labor Relations Board), or to receive a monetary award for information provided to a government agency, in each case without prior notice to or authorization from Company.

Furthermore, anyone in violation of this policy is subject to the sanctions as described in the Disciplinary Actions Policy. This policy is co-owned by the Ethics and HR teams who can be contacted at ethics@abnormal.ai. Full details on how to report a concern are set out in our [Whistle Blower & Complaints Policy](#).

Discipline & At-Will Employment

Although employment may be terminated at-will by either the employee or the Company at any time, without following any formal system of discipline or warning, we may exercise discretion to utilize forms of discipline that are less severe than termination. Examples of less severe forms of discipline include verbal warnings, written warnings, demotions and suspensions. Although one or more of these forms of discipline may be taken, no formal order or procedures are necessary. The Company reserves the right to determine which type of disciplinary action to issue in response to any type of performance issue or rule violation.

This statement of prohibited conduct does not alter or limit the policy of at-will employment. Either the employee or the Company may terminate the employment relationship at any time for any reason, with or without cause, and with or without notice. As previously set forth in this Employee Handbook, only the CEO/Owner of the Company or that person's authorized representative has the authority to enter into an employment agreement that alters the fact that the employment relationship is at-will, and any such agreement must be in writing signed by the President/Owner of the Company or an authorized representative.

Business Integrity & Ethics

Conflicts of Interest

All employees must conduct themselves in such a way as to avoid actual or potential conflicts of interest. A conflict of interest exists when an employee's personal interests are inconsistent with those of the Company and create conflicting loyalties. Employees must avoid situations where their personal interests conflict, or appear to conflict, with the interests of Company. The following are examples of prohibited conflicts of interest in any aspect of their jobs:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor or any entity that engages in business with the Company;
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, customer, competitor or any entity that engages in business with the Company;
- Receiving from or giving to any supplier, customer or competitor gifts, gratuities, special allowances, discounts or other advantages not generally available to employees of the Company;
- Having any significant direct or indirect personal interest in a business transaction involving the Company;
- Conducting outside activities that materially detract from or interfere with the full and timely performance of an employee's job duties for the Company;
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on the Company or its business.

If an employee has, or is considering the assumption of, a financial interest or outside employment relationship that might involve a conflict of interest, or if the employee is in doubt concerning the proper application of this policy, they should promptly discuss the matter with the Legal team and refrain from exercising responsibility on the Company's behalf in any manner that might reasonably be considered to be affected by any adverse interest.

Failure to disclose the fact of a conflict or potential conflict may constitute grounds for disciplinary action.

This policy in no way prohibits employee affiliations or activities that are protected under applicable state and federal laws, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to organize collectively and to speak with others about their terms and conditions of employment.

Outside Employment

The Company respects each employee's right to engage in activities outside of employment such as those that are of a personal or private nature, to the extent that such activities do not create a conflict of interest as described in the Conflicts of Interest policy set forth in this Handbook or adversely affect the employee's ability to perform their job. Under certain circumstances, however, if an employee's personal conduct adversely affects performance on the job or makes it impossible for the employee to carry out any or all job duties while at work, appropriate disciplinary action up to and including termination of employment may be appropriate.

An example of an activity that might adversely affect an employee's ability to perform their job duties is outside employment. While the Company does not prohibit employees from holding other jobs, the following types of outside employment are generally prohibited (to the extent allowed under applicable law):

- Employment that conflicts with the employee's work schedule, duties and responsibilities or creates an actual conflict of interest;
- Employment that impairs or has a detrimental effect on the employee's work performance with the Company;
- Employment that requires employees to conduct work or related activities during working times or using any of the Company's tools, materials or equipment; and
- Employment that directly or indirectly competes with the business or the interests of the Company.

For the purposes of this policy, self-employment is considered outside employment. The Company will not assume any responsibility for employees' outside employment. Specifically, Company will not provide workers' compensation coverage or any other benefit for injuries occurring from, or arising out of, such outside employment.

Gift Policy

All business transactions should be impartial, objective and free of improper influence. While it may be appropriate to exchange business courtesies in certain situations, Employees must not (a) offer or provide gifts or entertainment from vendors, customers or other third parties; or (b) seek or solicit gifts or entertainment from vendors, customers, or other third parties with the intent of improperly influencing a business decision. Furthermore, Employees must not offer entertainment or gifts to foreign officials or government employees - or make direct or indirect political contributions - on Company's behalf.

Gifts for employees, clients, and vendors must be approved by the department VP and generally kept under \$100 USD. Anything above \$100 USD should be reviewed by Finance. Employees may accept token gifts from customers only if they are non-monetary and valued at less than \$100 USD. Gift offers that exceed \$100 USD may not be accepted, and the offer must be reported to the People Operations team. Accepting substantial gifts, entertainment, loans, compensation, concessions or benefits from, or providing them to, an actual or potential competitor, supplier, or customer is prohibited. Gifts shall not be given or received if the gift would present or result in any conflict of interest (see Conflicts of Interest).

Laws, Rules, and Regulatory Compliance

All employees must conduct their business activities in full compliance with all applicable laws and regulations while conducting business on behalf of the Company.

Anti-Bribery & Anti-Corruption Policy

Company policy prohibits bribery in any form. It is Company's policy to comply with the letter and the spirit of anti-corruption laws in the United States and every other jurisdiction in which we do business. Whether in dealings with foreign officials, government employees, or individuals in the private sector, employees must never directly or indirectly engage in any bribery, kickbacks, or other types of corruption when dealing with such persons. This policy demonstrates and reflects Company's commitment to the highest prevailing international anti-corruption standards.

In particular, as a corporation domiciled in the United States, Company is subject to the United States Foreign Corrupt Practices Act ("FCPA"). The UK Bribery Act 2010 applies to Company operations in the UK and has

broad extra-territorial effect. Finally, laws implementing the OECD Convention Against Corruption, the United Nations Convention Against Corruption, and additional laws in countries throughout the world (such as the Brazil Clean Companies Act and the Canada Corruption of Foreign Public Officials Act) govern the conduct of Company employees in various jurisdictions. Virtually, all of these laws prohibit bribery of "Government Officials". The UK Bribery Act, and laws in other jurisdictions (including certain U.S. states) also criminalize bribery of private persons.

Company strictly prohibits engaging in or tolerating bribery or any other form of corruption. No employee will be penalized for refusing to pay a bribe. Further details on gifts, hospitality, facilitation payments, and dealings with government officials are set out in our [Anti-Bribery & Anti-Corruption Policy](#).

Anti-Money Laundering & Anti-Terrorist Financing

Company is committed to complying with all applicable anti-money laundering and countering-terrorist-financing laws. Employees must never assist in structuring or facilitating a transaction intended to conceal the source, ownership, or use of illegally obtained funds, and should be alert to red flags such as requests for payment in cash, to unrelated third parties, or to accounts in jurisdictions unconnected to the underlying transaction.

Political Activities and Lobbying

Employees may participate in the political process on their own time and using their own resources. Employees must not use Company funds, time, or resources to support a political candidate, party, or cause, and must not represent personal political views as those of the Company. Employees must not lobby government officials on Company's behalf unless specifically authorized by the Company in writing.

Antitrust & Fair Competition

Company is committed to fair competition. This means following the antitrust and fair competition laws of the countries where we operate. We expect all employees to not enter into any agreement that violates the letter or spirit of any antitrust or fair competition law.

Gathering Competitive Intelligence

When researching competitors, employees may rely only on appropriate public sources, such as public websites, news articles, public filings, customer feedback, and information shared at trade shows or conferences. Employees must never misrepresent their identity or employer to obtain information, solicit confidential information from a competitor's current or former employees, or use documents or data obtained through a data breach or other unlawful means. Any "found" confidential competitor materials (e.g., a misdirected email) should be reported without being reviewed or used further.

Insider Trading

Under federal and state laws, it is illegal to trade in the securities of a company while in possession of material nonpublic information about that company. As an employee of Company, you may gain access to material, non-public information about the Company, our customers or business partners as part of our business relationship. You must not share that information with others or use it for market trading or to tip anyone else in market trading.

This prohibition also extends to "tipping" which is the passing material, non-public information to family, friends, or others who may trade on it. To the extent Company designates certain employees as subject to trading windows, blackout periods, or pre-clearance requirements under a Company insider trading policy, those employees must comply with such requirements in addition to the general prohibition above.

Financial Integrity & Accurate Books and Records

All employees who create, maintain, or contribute to business records, including expense reports, timekeeping records, sales and pipeline data, and financial statements, must ensure those records are accurate, complete, and made in good faith. No employee may create a false or misleading business record, or direct or pressure another employee to do so, or intentionally omit or misclassify a transaction.

Trade and Export Control Laws

All employees must comply with all applicable international trade laws and regulations, including those related to export of commodities, technical data, and written or oral disclosures of technical data from the United States, as well as trade with the provision of services to certain individuals, entities, and nations.

Government Customers and Prospects

Company is proud to support government and quasi-governmental entities among its customer base. Activities that are appropriate when marketing to or communicating with commercial customers may be improper, or even illegal, when directed at a government entity. Employees involved in selling, marketing, or communicating with a government customer or prospect are responsible for knowing and following the specific requirements that apply. Failing to follow government procurement and marketing rules can expose Company to civil and criminal penalties, as well as debarment from future government business.

No Implied Government Endorsement

Employees must not state or imply that any government customer endorses, recommends, or has approved the Company or its products and services. The name, seal, logo, or likeness of any government customer may not be used in marketing materials, case studies, press releases, proposals, or investor communications without that customer's prior written approval, in addition to any internal approval otherwise required by Company for use of customer names generally.

Procurement Integrity

No marketing or sales activity may be used to circumvent, or appear to circumvent, competitive bidding, sole-source justification, or other procurement requirements applicable to a government customer or prospect. Employees should identify and follow the procurement rules that govern each government engagement and seek guidance where those rules are unclear.

Protecting Information, Technology & Intellectual Property

Information Security & Data Privacy

Protecting Company systems and data, including customer, employee, and business partner information, is inseparable from our mission and core to our business. All employees are expected to comply with applicable data protection and privacy laws and Company's security policies, including safeguarding login credentials, staying alert to phishing and other social engineering attempts, and using Company-approved tools and systems to handle Company or customer data. Employees should promptly report any suspected security incident or loss of personal data to the Privacy team at privacy.abnormal.ai.

Protecting Confidential Information

Company possesses sensitive, detailed information about our customers who rely on Company to safeguard that information. Laws and regulations tell us how to treat such data. Any inappropriate use of confidential customer information violates our customers' trust and may also violate a law or regulation. Preserving our customers' trust by safeguarding their private data is critical.

Intellectual Property

Company's intellectual property is its most valuable asset. Employees must safeguard Company intellectual property from unauthorized use or disclosure and never use or disclose the confidential information or trade secrets of a prior employer in the course of their work for Company. Employees must also respect the intellectual property rights of others, including customers, partners, and competitors, and may not use unlicensed software or knowingly incorporate third-party code in violation of its license terms.

Records & Information Management

Employees must manage business records, whether physical or electronic, including emails, chat logs, contracts, and expense reports, in accordance with Company's records retention schedule. Employees must never destroy, alter, or conceal a record in anticipation of, or in response to, a litigation hold, audit, or government investigation. Any employee who receives a litigation hold notice must preserve all records within its scope until notified in writing that the hold has been lifted.

Acceptable Use of Artificial Intelligence ("AI") Tools

Employees may use Company-approved AI tools to support their work. Employees must not input customer data, confidential Company information, or other sensitive information into any AI tool, chatbot, or coding assistant that has not been approved by the Company. Outputs generated using AI tools should be reviewed for accuracy before being relied upon or shared externally, and human review is required before relying on AI output for any decision with material, legal, or reputational impact. Questions about approved tools, or requests

to use a new AI tool, should be directed to the AI & Data team. Detailed requirements governing employee use of AI tools are set out in our Internal AI Usage Standard.

Responsible AI Development

As a company that builds AI-powered security capabilities, Company is committed to the responsible design, development, and deployment of artificial intelligence. Employees involved in building or training AI-driven features must: (a) maintain appropriate human oversight over AI-driven detection and decision-making capabilities; (b) ensure models are trained, tested, and enriched in a manner consistent with Company's Data Privacy and Security policies and applicable contractual commitments; (c) document the intended use, data inputs, and known limitations of a model before production deployment; and (d) escalate any identified bias, safety, or reliability concern before release.

People, Human Rights & Labor

Employment and Labor

Company is committed to diversity and treating all persons fairly and with dignity and respect. We expect all employees to comply with all applicable diversity, equity, and inclusion ("DEI") laws and consider how business decisions affect DEI in our workplace. Company expects our employees to respect employees' rights and to follow all applicable laws regarding working hours and conditions, freedom of association, collective bargaining, and the payment of fair and equitable compensation.

Equal Employment Opportunity & Anti-Harassment

Company is an equal opportunity employer and is committed to a workplace free of discrimination and harassment. Company prohibits discrimination or harassment on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions), sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, military or veteran status, or any other characteristic protected by applicable law. This commitment applies to all employment decisions, including recruitment, hiring, promotion, compensation, training, and termination.

Any employee who experiences or witnesses discrimination or harassment should report it immediately using the channels described under the Reporting Violations section.

Labor Practices

Company supports the principles reflected in the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the core labor standards of the International Labor Organization, including the right to freedom of association and collective bargaining.

Wage & Hour Compliance

Company complies with all applicable minimum wage, overtime, and equal-pay laws in the jurisdictions where it operates. Employees who are responsible for timekeeping, payroll, or compensation decisions must ensure pay practices comply with applicable wage and hour laws, including equal pay for equal work regardless of sex, race, or other protected characteristic.

Anti-Human Trafficking

Company supports the elimination of modern slavery and human trafficking. Company will not tolerate any human rights abuse or offenses and follows all applicable local, national, and international laws and regulations concerning human trafficking, child labor, forced or compulsory labor, and involuntary prison labor, including, but not limited to the Trafficking Victims Protection Act, the UK Modern Slavery Act of 2015, and the Australian Modern Slavery Act 2018. Company strictly prohibits the use of child labor and does not employ, or knowingly engage any vendor, contractor, or supplier that employs, any individual below the minimum working age required by applicable law. Further details are set out in our Modern Slavery and Human Trafficking Statement. Company regularly reviews its employment practices and performs due diligence to ensure against modern slavery and human trafficking in its supply chains. Review Company's [Modern Slavery and Human Trafficking Statement](#) for more information and details.

Health, Safety, & Environment

Environmental responsibility and sustainability are an integral part of Company's business strategy. At a minimum, we expect our employees to follow all applicable environmental laws and consider how to reduce environmental impact from our operations.

Workplace Violence Prevention

Company is committed to a workplace free from violence, threats, and intimidation. Employees must immediately report threats of violence, weapons in the workplace (except as permitted under applicable law), or other concerning behavior to People Operations. Where there is imminent danger, employees should contact law enforcement first and then promptly notify People Operations or Company leadership.

External Communications & Third Parties

Contact with the Media

To ensure that the Company communicates with the media in a consistent, timely and professional manner about matters related to the Company, you should notify media@abnormal.ai that you have been contacted by the media whenever you are asked to speak on behalf of the Company so that the Company knows that a media inquiry has been made. Do not respond to media inquiries on the Company's behalf without authorization. This rule does not prevent you from speaking with the media, but you should not attempt to speak on behalf of the Company unless you have specifically been authorized to do so by an officer of the Company.

Social Media and Public Commentary

Employees may participate in social media and other public online forums in their personal capacity. When doing so, employees should not represent themselves as speaking on behalf of the Company or disclose confidential or proprietary information unless authorized. Employees should exercise good judgment in their participation in social media consistent with this Code. This Code does not restrict any activity protected under Section 7 of the National Labor Relations Act.

Third-Party & Supplier Expectations

Company expects the vendors, suppliers, and other third parties it engages to conduct business consistent with the principles in this Code as set forth in its [Vendor Code of Conduct](#), including with respect to anti-corruption, data privacy and security, human rights and labor practices, and fair competition. Employees who engage or manage third-party vendors are responsible for ensuring appropriate due diligence is performed before onboarding, consistent with Company's vendor risk management and procurement policies, and for escalating any vendor conduct inconsistent with this Code.

Training and Administration

Required Training

The Company requires employees to complete certain trainings, which may include but are not limited to the below trainings:

- Sexual Harassment and Prevention Training
- Anti-Bribery and Anti-Corruption
- Security Awareness Training
- Privacy and Data Protection Training
- Job-role specific training (e.g., secure coding training for developers, etc.)
- Annual refresher training of some required training.

Purpose

This policy assures that Abnormal's mission, values, and principles are clearly documented and linked with standards of professional conduct.

More Information

This policy is owned by the Ethics and HR teams. For more information or to provide feedback, send an email to ethics@abnormal.ai.