

## **MIRO CODE OF CONDUCT**

RealtimeBoard, Inc. dba Miro (collectively with its subsidiaries, "Miro") is committed to conducting its business in an ethical, legal, and socially responsible manner. We act with integrity in all our business dealings in accordance with this Code of Conduct ("Code").

The parties agree that this Miro Code of Conduct Addendum shall be incorporated into and form part of the Agreement and be subject to the provisions therein, including limitations of liability.

This Code outlines Miro's company standards and expectations for itself for meeting goals while transacting business with transparency, honesty, trust, and social responsibility.

### **Compliance with Laws**

Miro commits to maintaining awareness of and comply with applicable laws and regulations in all jurisdictions where Miro conducts business, including but not limited to:

- Trade controls, as well as all applicable export, re-export, and import laws and regulations;
- Antitrust and fair competition laws;
- All laws and regulations on bribery, corruption, money laundering, terrorist financing, and prohibited business practices, including but not limited to (i) the Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UK Bribery Act), and other anti-corruption laws, (ii) laws governing lobbying, gifts, and payments to public officials, and (iii) political campaign contribution laws; and
- Privacy and information security laws and regulatory requirements.

### **Transparency and Ethical Business Practices Antitrust, Competition Laws and Fair Dealing**

Miro is committed to conducting business honestly and ethically within the framework of a free market. Miro competes fairly and follows all applicable antitrust and competition laws. In particular, Miro will not:

- Propose or agree with any competitor to fix, restrict, adjust or control prices, margins, or contractual terms and conditions;
- Coordinate competing bids or otherwise orchestrate any bid process in the attempt to direct a contract to a particular competitor;
- Boycott suppliers or customers;
- Divide or allocate markets, territories or customers;
- Limit the production or sale of products or product lines; or
- Otherwise discuss, plan or arrange to unreasonably restrain competition.

### ***Anticorruption and Bribery Laws***

Miro commits itself to never offering, promising, giving or paying (directly or indirectly) something of value in order to obtain or retain business or improperly influence a recipient's actions, or accepting such an improper payment or benefit, while working on behalf of its customers.

Providing gifts or entertainment to the employees of Miro customers to obtain or retain business or gain improper advantage is prohibited. Furthermore, it is never appropriate to give or receive a gift or offer of entertainment that is extravagant, creates a sense of obligation, or has the intent to influence a business decision.

An exception allows the employees of our customers to accept minor value marketing or “swag” items bearing trademark or logo of Miro (e.g., cups, pens, mousepads or notepads) as a business courtesy if the customer employee is not primarily involved in the sourcing, procurement, or contracting for goods or services. Miro will not offer gifts or entertainment the employees of its customers during a Request for Proposal (RFP) or other vendor selection process.

### *Conflicts of Interest*

Miro commits itself to avoiding situations or relationships that involve an inappropriate conflict, or the appearance of a conflict, with the interests of its customers.

### *Insider Trading*

Miro commits itself to complying with insider trading laws and regulations and its own internal policies governing insider trading. Miro will refrain from trading securities based on material, non-public information obtained from its customers and providing such information to others who might trade on it. Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a company’s securities.

### *Business Record Keeping*

Specifically, Miro commits itself to:

- Honestly and accurately recording and report all business information and complying with all applicable laws regarding their completion and accuracy;
- Creating, retaining, and disposing of business records in full compliance with all applicable legal and regulatory requirements; and
- Being honest, direct, and truthful in discussions with regulatory agency representatives and government officials.

## **Social Responsibility**

### *Respect for Human Rights*

Miro commits itself to sharing its commitment to human rights and dignity. While working on any Miro customer’s behalf, Miro will:

- Observe and comply with international principles relating to human rights, including but not limited to the Trafficking Victims Protection Act and the UK Modern Slavery Act of 2015;
- Treat all individuals with respect and dignity;
- Respect and safeguard individual privacy rights;
- Prohibit violent behavior, harassment and discrimination;

- Ensure voluntary employment and prohibit use of forced or involuntary labor of any type, including support for any form of human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercive means; and
- Not require workers to lodge “deposits” or their identity papers (government-issued identification, passports, or work permits) with their employer and make sure all workers are free to resign their employment in accordance with local and national laws or regulations without penalty.
- Not partake in the use any child labor. No person under the age of 15 (or under 14 where permitted by local law) may be employed. Workers under the age of 18 may not perform work that is likely to jeopardize their health or safety.

#### *No Tolerance for Discrimination*

Miro commits itself to maintaining a work environment free from unlawful discrimination and harassment against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, based on their actual or perceived race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex (including pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), age, sexual orientation, AIDs/HIV status, weight and height, military and veteran status and any other consideration protected by law (collectively referred to as “protected characteristics”). Miro will not tolerate discrimination or harassment based upon these protected characteristics or any other characteristic protected by applicable law.

#### *Labor and Wages*

Miro commits itself to:

- Furnishing fair compensation and comply with all applicable wage laws, including, but not limited to, those relating to minimum wages, overtime hours, maximum work hours and all applicable regulations.
- Observing and complying with local law requirements governing maximum work hours.
- Respecting employees’ right to freely associate and bargain collectively in accordance with all applicable laws and regulations;

#### *Health and Safety*

Miro commits itself to providing workers with a safe, secure and healthy environment in compliance with all applicable laws and regulations, and implementing reasonable and effective occupational health and safety measures.

#### *Protecting the Environment*

Miro recognizes its social responsibility to protect the environment. Miro commits itself to conducting operations in ways that are environmentally responsible and in compliance with all applicable environmental laws, regulations and standards.

#### **Reporting Concerns or Questionable Behavior**

If you wish to report questionable behavior or a possible violation of this Code, you are encouraged to work with your primary Miro contact to resolve your concern. If such reporting is not feasible or

appropriate or you otherwise have questions about this Code, please contact Miro through the following means:

- Email: [legal@miro.com](mailto:legal@miro.com)
- Mail: Send a letter to the Compliance Officer at RealtimeBoard, Inc. dba Miro, 525 Brannan Street, Suite 100, San Francisco, CA 94107