#### MIRO'S SUPPLIER CODE OF CONDUCT

#### **About Miro**

RealtimeBoard, Inc. dba Miro (collectively with its subsidiaries, "Miro") is the visual workspace for innovation that enables teams of any size to dream, design, and build the future together. Our mission is to empower teams to create the next big thing. Miro has over 70 million users and over 230,000 organizations around the world depend on Miro to accelerate product development, drive collaboration, and manage the entire innovation lifecycle, from discovery to definition to delivery.

At Miro, we believe in our values of empathy, innovation, collaboration, and learning. We encourage all of our Suppliers to engage the same behaviors and values that guide how we, as Mironeers, operate everyday including: Build Together; Empower and Care about Each Other; Listen First and Talk Second; Deliver Results and Prioritize Wisely; Never Stop Learning and Launch Fast and Iterate.

To learn more about Miro go to www.miro.com.

# Miro's Supplier Code of Conduct - Applicability

This Supplier Code of Conduct (the "Code") outlines the expectations for doing business in Miro's supply chain with transparency, governance, ethics, environmental sustainability, and social responsibility. The Code applies to any entity providing services, people, or products to Miro, including Miro's Suppliers (including all subprocessors and subcontractors), and a Supplier's employees, partners, vendors, subprocessors, business partners, agents, and subcontractors (combined in total "Suppliers").

Proper corporate governance, controls, and compliance with the Code is required to do business with Miro. Any failure to comply with this Code or applicable law, as updated by Miro, may be grounds for Miro to terminate or suspend its relationship with a Supplier. Miro may conduct reasonable inquiries of a Supplier's compliance with the Code at any time. Suppliers must ensure compliance with the Code throughout their supply chain for work related to a Miro contract.

#### **Human Rights and Workers Rights**

Miro is committed to promoting the fundamental principles of human rights throughout our supply chain and business operations - supporting our employees, communities and the workers that provide us with products and services. Suppliers are expected to share Miro's commitment to human rights including abiding by the United Nations Universal Declaration of Human Rights. Suppliers must, without limitation:

- 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 inappropriate behavior, violence, harassment, and discrimination. Suppliers shall have in place a mechanism that addresses abuse of authority and sexual harassment;
- prohibit involuntary labor; slavery and forced, bonded, or indentured labor; including not allowing the use of or employ any child labor;

- Not require workers to lodge "deposits" or their identity papers (government-issued identification, passports, or work permits) with their employer. All workers shall be free to resign their employment in accordance with local and national laws or regulations without penalty;
- Employ workers who are legally authorized to work and regularly validate eligibility;
- Furnish fair compensation and comply with all applicable wage laws, including, but not limited to, those relating to minimum wage, overtime, maximum work hours and all applicable regulations;
- Respect employees' right to freely associate and bargain collectively;
- Provide workers with a safe, secure and healthy work environment; and
- Implement reasonable and effective occupational health and safety measures including measures to prevent, manage, track, and report occupational injury and illness; encouraging worker reporting; investigating cases and implementing corrective actions; and facilitating return to work.

### **Compliance with Laws**

Suppliers must maintain awareness of and comply with federal, state, and local laws and regulations in all jurisdictions where Miro and the Supplier conduct business, including but not limited to:

- Trade controls, as well as all applicable export, re-export, and import regulations;
- Antitrust and fair competition laws;
- All laws and regulations on bribery, corruption, money laundering, sanctions, terrorist financing, and prohibited business practices, including but not limited to the following must be followed regardless of where the Supplier does business (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; Corruption, in any form, including bribes, kickbacks, or lavish gifts and/or entertainment, are strictly prohibited;
- Privacy and information security laws and regulatory requirements;
- Employment eligibility laws;
- Policies supporting sustainability and social responsibility including the UN Global Compact; and
- Insider trading laws

If a law and this Code address the same issue, the more stringent requirement shall apply to Supplier. If any law invalidates a portion of this Code then the rest of the Code shall remain in effect.

# **Business Ethics and Integrity**

Miro is committed to conducting business honestly; promoting ethical business practices. Suppliers shall perform work with the highest degree of ethical conduct and maintain a corporate code or policy of business conduct and ethics. This policy should incorporate effective controls, including training, monitoring, auditing and good record keeping, to prevent and detect unlawful and unethical conduct.

The following are some of the business ethics Supplier should have in place:

- Policies to procure items in line with ethical practices including avoiding any activities involving bribes, kickbacks, or giving an appearance of impropriety.
- Guidelines that prohibit employees from engaging in self-dealing and conflicts of interest among directors, officers, customers, employees, subprocessors, and subcontractors., Miro requires its Suppliers to avoid situations or relationships that involve an inappropriate conflict, or the appearance of a conflict, with the interests of Miro. Suppliers are expected to disclose all actual and potential conflicts of interest to Miro, where circumstances arise that could cast doubt on Supplier's ability to conduct business with Miro with complete objectivity.
- Oversight to ensure a Supplier never discusses, plans or arranges to unreasonably restrain competition in any way including: a strict commitment to not to fix, restrict, adjust or control prices, margins, or contractual terms and conditions with any competitor; or Coordinate competing bids or otherwise orchestrate any bid process in the attempt to direct a contract to a particular competitor,
- Business practices to ensure Supplier does not offer or provide (directly or indirectly) something of value to Miro employees or directors with the intent to influence or reward them outside of Miro's policies. Providing gifts or entertainment to Miro employees in order to obtain or retain business or gain an improper advantage is prohibited.

If you believe corrupt practices are occurring within Miro's supply chain, Suppliers must report such concerns to Miro immediately to <a href="mailto:legal@miro.com">legal@miro.com</a>.

# **Diversity and Inclusion.**

Suppliers shall demonstrate a commitment to diversity and inclusion by embracing a diverse workforce and proactively engaging diverse suppliers of their products and services. Miro promotes a culture of Diversity, Equity & Inclusion in our company, with our customers and across our communities.

Suppliers must maintain 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 race, religious creed, color, national origin, ancestry, physical or mental disability, gender, age, sexual orientation, veteran status and any other consideration protected by law. Miro will not tolerate discrimination or harassment based upon these protected characteristics or any other characteristic protected by applicable law.

# Information and Data Management.

Suppliers shall conduct their business with the highest care for Miro's confidential information and data and follow industry standard security practices and conducting business according to applicable privacy laws and regulations including:

- Honestly and accurately recording and reporting 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;
- Respecting the intellectual property rights of Miro, its customers and other and all third parties;

- Protecting confidential information and complying with privacy and information security laws and regulations and utilizing industry standard security best practices to protect confidential and sensitive information including how data and information is stored, shared, processed, and/or transmitted.
- Obtaining appropriate permissions to utilize data of Miro, its customers and business partners, including their employees, as well as the data of third parties, for advanced analytics and artificial intelligence, including to train artificial intelligence technologies or models.
- Maintaining responsible practices for the governance, design, development, monitoring, and performance of AI systems that uphold honesty and fairness in system decisions, and ensure safe, secure, auditable, transparent, and explainable processing of information.

### <u>Sustainability</u>

Miro recognizes its social responsibility to protect the environment. Suppliers are expected to conduct operations in ways that are environmentally sustainable and in compliance with all applicable environmental laws. Miro expects Suppliers to support Miro's sustainability and environmental priorities through its products and services and the Suppliers' own corporate initiatives.

Suppliers shall demonstrate a commitment to responsible environmental stewardship by: supporting Miro's environmental policies; providing Miro with applicable reporting and data; and conducting business with actions that benefit Miro's clients, stakeholders, employees, and communities. Miro fosters innovative thinking about a workplace that reduces environmental footprints including reducing resource consumption, greenhouse gas emissions, and managing waste responsibly and expects Suppliers to do the same.

# **Reporting Concerns or Questionable Behavior**

Miro expects Suppliers to uphold our values and ethical standards globally and to report questionable behavior or any possible violation of this Code. Whether a violation by a Miro employee or a Supplier —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 via email at <a href="legal@miro.com">legal@miro.com</a> or send a letter to the Compliance Officer at RealtimeBoard, Inc. dba Miro, 201 Spear Street Suite 1100, San Francisco, CA 94105

If you learn of a possible violation of law, regulation, or the Code through your own internal ethics reporting structure that may impact Miro, please also report it through the above channels.