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**CODE OF BUSINESS CONDUCT**

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## LETTER FROM THE CEO

For Mynd.ai to be successful over the long term, our relationships with customers, suppliers and partners must be built on a foundation of honesty and integrity. We are committed to this principle, because it is right and because it makes good long-term business sense. It means all of us must act honestly and with integrity at all times, and be respectful of others, responsible in our actions, and prepared to be held accountable for those actions.

The standards and guidelines set out in this Code of Business Conduct reflect our commitment to honest and ethical business practices and provide standards and guidelines for our employees, directors, officers, and others doing business on our behalf.

The standards are intended to promote an ethos that reflects high standards of integrity and compliance with all applicable laws, rules and regulations. They are not intended as a substitute for such laws, rules and regulations or as a comprehensive summary of their provisions, so all employees and others doing business on behalf of Mynd.ai must ensure that they understand what laws, rules and regulations apply to their respective roles.

The guidelines should be used to help you make better decisions when you are faced with difficult issues. However, they cannot cover every situation, and when in doubt, you should seek advice and, above all, always apply common sense.

Anyone who feels that the conduct of Mynd.ai, or any person employed by or engaging in business with the Company, is not complying with this Code or with the law, should raise their concerns with management or via the Company's Whistle-Blower Policy.

Mynd.ai's reputation is a valuable asset that each and every one of us is responsible for protecting. I ask you to take the time to read this Code of Business Conduct, familiarize yourself with it, and apply its principles in all the decisions you make.

Thank you.



Vin Riera

CEO

**WE ARE COMMITTED TO ETHICS AND COMPLIANCE**

Mynd.ai, together with all of its subsidiaries and controlled affiliates (referred to collectively as “**Mynd.ai**” or the “**Company**”) is committed to maintaining the highest standards of ethical conduct and compliance with the law in all of our business dealings.

Our Code of Business Conduct (the “**Code**”) reflects this commitment. The Code identifies the standards that guide our actions, describes the values and ethical behavior expected of individuals acting on Mynd.ai’s behalf, and reinforces our collective commitment to doing business the right way. Mynd.ai expects you, as a Covered Person (defined below), to adhere to the Code and comply with the letter and spirit of all applicable laws, rules, regulations, and Mynd.ai’s policies.

Mynd.ai encourages you to ask any questions you may have about the Code and its applicability, and any other ethical or legal issues. Please speak up and contact Mynd.ai’s Legal Department if you have questions, or raise concerns through contacting the Legal Department at legal@mynd.ai, your manager, or our SafeCall system (see detail in section on Reporting).

**Our Eight Core Values**

Our core values are our guiding principles. They provide a framework for our leadership, daily decisions, and employee satisfaction.

Act like Owners	Fixate on Customers and Partners	Debate and then Commit	Be Discrimination Free
Choose Speed and Action	Continuous Improvement & Growth	Build Trust and Integrity	Design with Intent

**OPERATING UNDER THE CODE**

**Who Does the Code Apply To?**

This Code applies to you, if you are a director, officer, or employee of Mynd.ai, Mynd.ai’s subsidiaries, and those affiliates directly and indirectly controlled by Mynd.ai globally, as well as if you are a temporary employee, self-employed worker, or independent contractor acting on behalf of Mynd.ai or any of the above-described subsidiaries and affiliates (collectively referred to as “**Covered Persons**” or “**you**”).

## **Expectations for Covered Persons**

You must read, understand, and comply with the Code. You may not take any actions that are contrary to the Code, nor may you authorize, direct, or condone Code violations by any other individual or entity working on Mynd.ai's behalf.

In addition, you are expected to:

1. Act honestly and ethically in all business dealings, and in a manner consistent with the values and principles of the Code;
2. Know and comply with relevant laws, regulations, rules, standards, and restrictions related to your duties, function, and responsibilities;
3. Deal fairly with customers, suppliers, business partners, competitors, and colleagues, and treat others with respect;
4. Refuse to take any action you know or suspect is illegal or unethical, even if directed to by a supervisor or manager, and even if such action appears to benefit Mynd.ai;
5. Speak up about potential misconduct and promptly report known or suspected violations of laws, regulations, rules, or the Code; and
6. Act in good faith and in the best interests of the Company.

## **Expectations for Managers and Leaders**

Managers and other leaders at Mynd.ai are expected to be role models and to lead by example in all aspects of their work, including by maintaining the highest standards of ethical conduct in all of their business dealings, and fostering a culture of ethics among their teams. Managers and Leaders must ensure that their direct reports are familiar with the Code and report known or suspected violations. Managers and other leaders are also responsible for creating an atmosphere in which you are encouraged to raise concerns and report suspected violations in good faith, without fear of retaliation. Managers and other leaders must escalate any reports they receive related to known or suspected violations of the Code, laws, regulations, or policies to their supervisors, or to the legal department or the compliance reporting system.

## **Working with Business Partners**

Business Partners are third parties acting on Mynd.ai's behalf or at Mynd.ai's direction. Mynd.ai is committed to working with Business Partners that share our values and commitment to legal and ethical conduct. You may not direct, authorize, condone, tolerate, or knowingly benefit from, behavior by

Business Partners that would violate the Code if directly engaged in by a Covered Person, or willfully ignore suspicions of such behavior.

## **Violations of the Code**

Violations of the Code, as well as any law, regulation, or other Mynd.ai policy, may result in significant legal consequences and reputational harm for Mynd.ai. If you direct, approve, conduct, overlook or commit a violation of this Code, you may be subject to disciplinary action including, but not limited to, termination of employment or contractual relationship, removal from the Board (if a Director), legal action or referral for criminal prosecution, subject to applicable laws and regulations.

The General Counsel is responsible for creating and maintaining systems to secure awareness of and compliance with this Code.

As part of those systems, Covered Persons must complete periodic training and certification on this Code.

## **REPORTING**

### **Duty to Report**

You must report known or suspected violations of the Code, as well as any law, regulation, or other Mynd.ai policy, to your manager or supervisor, the Legal Department, or through Mynd.ai's compliance reporting system. It is critical that you speak up about your concerns to help Mynd.ai prevent unethical conduct from occurring, continuing, or escalating. Failing to report or withholding information about any known or suspected Code violation may itself be a violation of the Code.

For more detail on reporting, please see Mynd.ai's Whistle-Blower Policy.

### **How to Report**

At any time, you may report any violations, or suspected violations, of this Code as well as any law, regulation, or Mynd.ai policy to your manager or supervisor, or the Legal Department.

Alternatively, you may report violations, or suspicions of violations, through Mynd.ai's compliance reporting system. You may use the Company's third-party operated and hosted confidential reporting hotline provided by SafeCall:

- By calling the third-party hosted telephone hotline via toll-free telephone numbers in the following countries: Australia 0011 800 72332255; Bahrain 8000 4264; Canada 1 877 599 8073; China Unicom 10800 744 0605; China Telecom 10800 440 0682; France 00800 72332255; Germany 00800 72332255; Italy 00800 72332255; Singapore Singtel 001 800 72332255; Singapore MI 002 800 72332255; Spain 00800 72332255; UK 0800 915 1571; US 1 866 901 3295.

- You can make a confidential report in one of 40 languages at the following website: [www.safecall.co.uk/report](http://www.safecall.co.uk/report). Hold down “Ctrl” and click on this link, and follow the instructions in your chosen language.

You may also make a report directly to the Audit Committee. For more detail, see the Whistle-Blower Policy.

Whichever way you report, you should provide enough detail so that Mynd.ai can effectively investigate your concern. You can report anonymously, unless otherwise prohibited by law. Nothing in this Code is intended to prevent you from reporting potential violations of law or regulations to any governmental authority.

### **Internal Investigations**

Mynd.ai takes reports made in good faith seriously. All reports will be acknowledged and feedback will be provided as described in the Whistle-Blower Policy.

### **Prohibition on Retaliation**

Mynd.ai prohibits retaliating or attempting to retaliate against anyone who makes or helps someone make a good faith report of a known or suspected violation of the Code, policies, procedures, or illegal or unethical behavior. Mynd.ai also prohibits any form of retaliation or intimidation against those for participating in an investigation. Mynd.ai also prohibits retaliation against anyone who in good faith refuses to carry out a request or perform an action that would violate this Code. Retaliation, or attempted retaliation, in these circumstances is itself a violation of the Code.

### **Duty of Cooperation and Prohibition on Obstruction in Internal Investigations**

You are required to cooperate fully in internal investigations, including by providing truthful and complete information. You may not attempt to conceal or cover up any known or suspected Code, policy, or legal violation, including by attempting to stop another Covered Person from reporting a known or suspected violation of this Code, or from cooperating in an investigation regarding the Code.

### **Government Inquiries and Investigations**

From time to time, you or Mynd.ai may be contacted by, or receive requests for information from, government investigators during a governmental investigation. Mynd.ai is committed to cooperating in good faith with all government investigations and requires you to do the same. You must not destroy or alter documents relevant to, provide inaccurate or misleading information about, or otherwise obstruct a government investigation.

You must immediately notify your manager and the Legal Department if you are contacted by or receive a request for information from a government investigator. In general, you may not provide corporate

documents to any government investigator without written pre-approval from the General Counsel. If government investigators demand corporate documents during a search of Mynd.ai facilities despite the lack of Mynd.ai's consent, you should endeavor to make copies of such documents and a list of every document inspected, copied, or seized.

## **ADHERENCE TO THE LAW**

Following all applicable laws and regulations is critically important to Mynd.ai's reputation and ability to operate globally. Failure to do so can create significant legal, regulatory, and reputational risk for Mynd.ai. You must follow all applicable laws and regulations of each of the countries where Mynd.ai operates.

We expect you to comply with the Code and other Mynd.ai policies, as applicable to you, as well as all applicable laws and regulations regardless of your geographic location. If a provision of the Code or any other Mynd.ai policy conflicts with any local law or regulation where you are based, the more restrictive provision applies.

### **Accurate Record-Keeping**

Mynd.ai is committed to maintaining accurate books, records, and accounts. You must keep accurate, complete, and reasonably detailed records of all Company transactions. You must document transactions in a timely manner. Agreements with partners, customers, and others must be transparent and documented in written agreements, accurately reflect the terms of the arrangement, and not include "side deals" or other off-the-books arrangements.

For clarity, Mynd.ai specifically prohibits:

- Establishing or using any secret or off-balance sheet function or account for any purpose;
- Using corporate funds to establish or use any numbered bank account that is not identified by the name of the owner; and
- Establishing or using any offshore corporate entity for any purpose other than a legitimate Company business purpose.

You are also required to retain Mynd.ai records for the period of time specified by applicable laws, Company policies (including retention requirements related to pending investigations or litigation), and business requirements.

### **Antitrust Laws and Restrictive Trade Practices**

Antitrust laws are designed to protect the integrity of open and fair competition. They prohibit agreements between competitors to restrict trade, as well as practices of a single company to monopolize an industry or trade. Mynd.ai is committed to complying with all applicable antitrust laws and regulations.

If you are making decisions for Mynd.ai, you need to be aware that antitrust laws and regulations can apply to almost all aspects of the Company's activities: marketing, procurement, contracting, selling, mergers and acquisitions, and more. Moreover, certain types of conduct or transactions are more likely to have potential antitrust implications. For example:

- Agreements with competitors to fix or control prices;
- Bid rigging;
- Boycotts of certain suppliers;
- Coordinating with competitors to divide up customers and/or geographic areas;
- Agreements to limit production or sale of products;
- Tying arrangements;
- Exclusive dealing contracts or arrangements;
- Agreements with competitors not to poach employees; and
- Certain restrictive agreements with suppliers and customers.

You must seek guidance from the Legal Department any time you are contemplating entering into a contract or arrangement that might involve any of the above, or otherwise raise antitrust concerns.

### **Trade Control Restrictions**

Mynd.ai is committed to adhering to applicable trade control laws and regulations, including import and export controls, embargoes, and other economic sanctions. If you are involved in exports, imports, or technology transfers, you must be aware that, in certain instances, governmental licenses or approvals may be required for the cross-national transmission of goods, services, software and technical data, and sometimes even for oral or written disclosure to a foreign person within the same country. In addition, you must be sensitive to prohibitions on most activities associated with locations that are designated as being embargoed and parties that are designated as being sanctioned. You should contact the Legal Department with questions before consummating the transaction.

## **INTEGRITY**

### **Bribery and Corruption**

Mynd.ai prohibits bribery and corruption in all forms. As part of our deep commitment to doing business the right way, we prohibit seeking any improper advantage in business dealings, and we are committed

to avoiding even the appearance of impropriety in our interactions with government officials, business partners, customers, suppliers, competitors, and other third parties. Mynd.ai expects you to abide by Mynd.ai's Anti-Bribery and Anti-Corruption Policy and all relevant laws in every jurisdiction where we operate.

Mynd.ai prohibits improper payments and benefits. Specifically, you may not offer, promise, provide, or authorize giving anything of value, directly or indirectly, to anyone in exchange for an improper business advantage. Similarly, you may not request or accept anything of value in exchange for improperly obtaining or maintaining a business relationship or granting business or a business advantage.

You may not use your own funds to engage in any activity that is otherwise directly prohibited by this Code or other applicable Mynd.ai policy, law, or regulation, nor may you make, authorize, or condone improper payments through Business Partners or other third parties.

For more detail on your obligations in this area, see Mynd.ai's Anti-Bribery and Anti-Corruption Policy.

### **Business Courtesies**

Mynd.ai recognizes that reasonable business courtesies can create goodwill and facilitate sound working relationships. However, a business courtesy may trigger anti-corruption laws when the provision crosses a line into conduct that could be characterized as bribery.

You must be particularly cautious when providing anything of value to government officials. In many instances, you must obtain prior written approval from the Legal Department. For more detail on your obligations in this area, see Mynd.ai's Anti-Bribery and Anti-Corruption Policy.

### **Insider Trading and Corporate Communications**

You must not use or share material non-public information about Mynd.ai for trading purposes because doing so is illegal and would harm our relationships with investors, regulators and the public. For guidance on what constitutes material non-public information and other rules about trading, review our Insider Trading Policy. You must also not share significant non-public information about Mynd.ai with anyone outside the Company, unless authorized by the Mynd.ai Corporate Communications Policy.

### **Conflicts of Interest and Corporate Opportunities**

You are expected to uphold the Company's best interests when acting on the Company's behalf. This means avoiding situations where your personal relationships or interests interfere with, or could be seen as interfering with, your duties and responsibilities to Mynd.ai. These situations are called "conflicts of interest."

Conflicts of interest can arise when you have an outside interest, duty, responsibility, or obligation that conflicts with the interests of Mynd.ai. They can also arise when you have a personal or close familial

relationship that could be seen as interfering with your responsibility to Mynd.ai. While this Code cannot list them all, some examples of conflicts of interest may include:

- Engaging a close family member or close friend to provide services to the Company;
- Accepting payments or other benefits from a competitor;
- Having a significant financial interest in a competitor or a business that does business with the Company or seeks to do business with the Company;
- Accepting certain outside employment; and
- Personally benefitting, or having a family member benefit, from a Mynd.ai procurement decision.

You must disclose any actual or potential conflict of interest to the Legal Department in writing at [legal@mynd.ai](mailto:legal@mynd.ai). In appropriate circumstances, the Legal Department can approve certain relationships or transactions that may otherwise have given the appearance of creating a conflict.

You also may not compete with Mynd.ai or take personal advantage of business opportunities that the Company might want to pursue. You must not take for yourself personally (or for the benefit of your family members or other close personal relationships) opportunities that are discovered through the use of Mynd.ai property, information, or position. Even opportunities that are acquired through independent sources may be questionable if they are related to the Company's existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to Mynd.ai's existing or proposed lines of business must be pre-approved by the Legal Department. If you are in doubt about a corporate opportunity, please contact the Legal Department via email at [legal@mynd.ai](mailto:legal@mynd.ai).

Directors and officers may not participate in any deliberation or decision-making process relating to transactions in which such director or officer has a potential conflict of interest, or which involves a situation where that director or officer may be considered to be competing with Mynd.ai or taking advantage of a Mynd.ai corporate opportunity.

### **Fair Dealing and Fraud**

You should deal fairly with customers, suppliers, business partners, competitors, and employees. No person may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, or any other unfair-dealing practice. Nor should you engage in fraud, including intentional misrepresentation or nondisclosure with an intent to deceive, in connection with any Company affairs.

## **PROTECTING COMPANY RESOURCES AND CONFIDENTIAL INFORMATION**

You must use Mynd.ai's resources, including confidential information, data, physical resources and information technology resources, responsibly and only for the benefit of the Company, and safeguard these resources from damage or theft. You must spend Company funds and use Company resources wisely, guarding against waste and abuse. You must vigorously protect Mynd.ai's intellectual property (including the Company's trademarks, logos, copyrights, trade secrets, "know how," and patents). These obligations are further outlined in your engagement agreements and applicable laws and regulations.

You must not disclose Mynd.ai's confidential information, including operational, financial, trade-secret, or other business information externally without express authorization, and exercise caution in sharing such information internally, except where there is a business need to know.

You must also take care to prevent the unauthorized disclosure of confidential information, including storing such information securely and being cautious when discussing this information in public settings.

Additionally, you must respect and protect the confidentiality of other Covered Persons by maintaining the confidentiality of their personal information.

You are also responsible for protecting and maintaining the confidentiality of any information entrusted to us by our partners, customers, suppliers and other parties with whom we do business.

This Code also prohibits the illegal use of anyone else's intellectual property or confidential information, including information obtained from a prior employer or business partner.

For more detail on your obligations in this area, see the IT and Privacy Policies for Mynd.ai and its subsidiaries applicable to you.

## **A SAFE AND INCLUSIVE WORKPLACE**

### **Safe and Healthy Work Environment**

Mynd.ai is committed to ensuring the health, safety and welfare of all employees and visitors, and providing and maintaining safe working conditions. Maintaining a safe and healthy work environment requires your continuous cooperation. Mynd.ai's commitment to safety and health in the workplace means more than simply following safety rules. Mynd.ai can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. You have a personal responsibility while at work to take reasonable care of your own and others' health and safety.

This means that you must:

- Take all reasonable precautions to prevent workplace illness, accidents, or injuries, by understanding and managing the risks present in the daily work environment.

- Always follow safety and workplace procedures and expect visitors to do the same.
- Speak up if you observe an unsafe working environment or cannot complete your task safely. Listen to others who speak up.
- Report any accident, injury, illness, or unsafe condition immediately to your manager or the HR team at [HumanResources@Mynd.ai](mailto:HumanResources@Mynd.ai). Do not assume that someone else has reported a risk or concern.
- Know the emergency procedures that apply to your office or workplace.

### **Drug-Free Workplace**

Mynd.ai strives to maintain a professional, drug-free work environment. Use of alcohol, illegal drugs, or controlled substances, whether on or off the job, can detract from work performance, efficiency, safety, and health and seriously impair an employee's responsibility to the Company. Specifically, Mynd.ai prohibits possession or use of an illegal or controlled substance or being under the influence of an illegal or controlled substance while on the job, driving a vehicle while on Mynd.ai business while under the influence of alcohol or an illegal or controlled substance, distribution, sale, or purchase of an illegal or controlled substance while on the job.

Moderate consumption of alcohol by legal-age individuals at Mynd.ai-sponsored events is permitted. Everyone involved must exercise good judgment, act in a professional and responsible manner, and follow directions provided for the sponsored event. Attendance at Mynd.ai social events is not mandatory, and Covered Persons who choose to attend should not be pressured to consume alcoholic beverages.

For more detail on your obligations in this area, see your applicable Employee Handbook.

### **Fair and Equal Workplace**

Mynd.ai is committed to a workplace culture that values and promotes diversity, inclusion, and equal employment opportunities. Mynd.ai prohibits discrimination on the basis of national origin, ancestry, race, religion, gender (including pregnancy and gender identity and expression), veteran status, political affiliation, sexual orientation, marital status, disability, medical condition, age, parental status, family or medical leave status, or any other protected class under applicable federal, state, or local laws.

Mynd.ai is also committed to maintaining a respectful working environment that is free from harassment. Mynd.ai prohibits harassment of any kind toward any individual in the workplace or outside the workplace on matters connected to Mynd.ai. This policy of non-discrimination and harassment is not limited to employees and potential employees, but extends to how the Company treats our partners, investors, customers, suppliers, and other stakeholders.

For more detail on your obligations in this area, see your applicable Employee Handbook.

## **CARE FOR OUR COMMUNITIES**

### **Human Rights**

Mynd.ai recognizes its responsibility to uphold internationally recognized human rights in all aspects of its business operations worldwide and supports the principles contained within the United Nations Universal Declaration of Human Rights.

### **Lobbying Activities and Political Contributions**

Mynd.ai recognizes the right to lawfully lobby on behalf of issues that affect Mynd.ai and its business operations. You are not authorized to lobby on Mynd.ai's behalf without approval from the Legal Department at legal@mynd.ai.

Any political contributions on Mynd.ai's behalf, including allowing the use of Mynd.ai facilities by politicians, political parties, or candidates, must be pre-approved in writing by the Legal Department. Requests for political contributions must be submitted for approval to the Legal Department at legal@mynd.ai. The Legal Department will review the request and, if appropriate, elevate the request to the Board for approval. You may not use personal funds to make political contributions in Mynd.ai's name or to obtain improper business or business advantage for Mynd.ai.

While you are free to participate fully in the political process with your own resources, you should not use Mynd.ai resources or perform political activities (such as working on a political campaign or conducting business as a public official) during work time. It is also impermissible for a supervisor, manager, or officer to encourage a subordinate employee to make a personal contribution of funds or services to any candidate or holder of public office, or a person or group promoting a position on a public issue or candidate.

### **Charitable Contributions**

Mynd.ai encourages you to volunteer and give back to your communities. However, as with political activities, all charitable donations, grants, and sponsorships made by or on behalf of Mynd.ai must be pre-approved by the Legal Department in writing. These transactions must be transparent, documented, and appropriately recorded in Mynd.ai's books and records. This requirement does not apply to the donation of time and services that Covered Persons are permitted to take as part of the volunteer days approved by the Company.

## THE FINE PRINT

The Code cannot cover every situation or ethical issue employees might face, and it is not a substitute for common sense. You are expected to be guided not just by the exact guidelines in the Code, but by the spirit of the Code and by your own sense of what is ethical. Thus, even if a topic or situation is not covered by the Code, but seems to be wrong or unethical, you should speak up and follow the reporting procedures described in the Code.

### Waivers of the Code

Any request for waivers from the Code must be made in writing to Mynd.ai's General Counsel at legal@mynd.ai. The Company will waive application of the Code only in rare circumstances, and where there is extraordinary justification for the waiver. Notwithstanding the foregoing sentence, only Mynd.ai's Board of Directors may waive a provision of the Code for a Director or Executive Officer of Mynd.ai.

### Disclaimers

Mynd.ai continuously looks to improve its operations and compliance in all areas. Accordingly, the Code may be modified from time to time, the latest version of which will be displayed on Mynd.ai's website. Additionally, the Code supersedes and replaces any prior Mynd.ai Code of Business Conduct. To the extent there are any conflicts between the Code and any other Mynd.ai policies or procedures, the more restrictive requirements shall apply. The Code was designed to be compliant with all applicable laws and regulations, but the Company recognizes that legal changes may occur. Therefore, to the extent any provisions of the Code conflict with applicable laws, the provisions of the applicable laws shall apply.

### Revision History

Version	Effective Date	Approved By	Notes (e.g., description of changes)
1.0	December 13, 2023	Mynd.ai Board of Directors	