

Markup AI Code of Conduct

Revised: December 2025

I) Preamble

At Markup AI, we believe in the power of building organizational culture on our Company Values. How we choose to act, interact, communicate, and make decisions every day brings those values to life.

This Markup AI Code of Conduct (the “Code”) provides guidance on what is expected of any director, officer, employee, or temporary staff of Markup AI (the “Staff”). It serves as a framework and blueprint for behavior and communication. As such, it becomes an inherent element of the agreements, contracts, and engagements made with the stakeholders listed above.

The Markup AI Chief Compliance Officer is appointed to support and guide all stakeholders to comply with this Code.

II) Our Operating Framework: The CLEAR Values

The five Markup AI Company Values—our **CLEAR** framework—shall guide any action, interaction, and behavior of Markup AI and Staff, in public and in the marketplace. Living up to these values every day is the first and most important principle of this Code.

- 1. Courageous** We embrace bold risks and lead with conviction, pioneering new solutions when others hesitate. We speak up and call out unethical behavior.
- 2. Linguistically Brilliant** We honor our heritage in the power of language while bringing the magic of innovative AI to transform communication.
- 3. Empowering** We trust our people with genuine authority and foster a culture of transparency where information flows openly and honestly across all levels.
- 4. Agile** We move with purposeful speed, adapt quickly to change, and aren't afraid to pivot when necessary.
- 5. Reliable** We deliver on our promises with precision and follow through on our commitments, building trust through consistent excellence.

III) Courageous: Speaking Up & Accountability

1. Our Commitment We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith. Staff shall report—without hesitation—any unethical behavior or suspected case of a breach of this code to:

- Their People Leader
- The Chief Compliance Officer
- NAVEX EthicsPoint (External Whistleblowing Platform).

2. Leadership Responsibility People Leaders at Markup AI have a responsibility to create an open and supportive environment where employees feel comfortable raising questions. Leaders must not consider ethics concerns as threats, but as an encouraged form of business communication.

IV) Empowering: Respect & Environment

1. Respect for the Individual As an **Empowering** organization, we trust our people and believe everyone deserves to work in an environment where they are treated with dignity and respect. We extend this same respect to our colleagues, customers, and partners.

The work environment shall be kept free from:

- Any discrimination or harassment (race, sex, religion, disability, age, national origin, and sexual orientation, etc.).
- Sexual abuse, inappropriate advancements, or offensive jokes/slurs.
- Intimidation or bias that prevents employees from reaching their fullest potential.

2. Respect for the External Environment Markup AI is conscious of the impact our activities have on the environment. We are committed to our Sustainability Agenda and the UN Sustainable Development Goals. Staff should make decisions—from sorting trash to choosing public transport—that support climate protection.

V) Reliable: Honesty, Integrity & Transparency

1. Integrity in Action To be **Reliable** means we deliver on our promises. The success of our business is dependent on the trust we earn from employees, customers, and partners. We must ask ourselves: *Will this action build trust and credibility for Markup AI?*

2. No Conflict of Interest We avoid relationships or activities that might impair our ability to make objective, reliable decisions. Conflicts often arise in areas such as:

- Acting as a consultant to a competitor.
- Hiring family members in direct reporting lines.
- Accepting gifts or discounts not available to all employees.

3. Accurate Public Disclosures All disclosures in financial reports and public documents must be full, fair, accurate, timely, and understandable. No business goal is ever an excuse for falsifying records.

4. Fair Competition We are dedicated to ethical, fair, and vigorous competition. We will not improperly cooperate with competitors on pricing or marketing, nor will we offer improper payments or gratuities.

5. Data Protection We safeguard company, employee and customer data by handling it responsibly and following all security and privacy policies.

VI) Linguistically Brilliant & Agile: Innovation & Assets

1. Intellectual Property & Assets As we honor the power of language and AI, we must rigorously protect the intellectual property of Markup AI and our partners.

- **Protection:** Staff is obliged to protect physical (equipment, systems) and intellectual (software, templates, inventions) property.
- **Third Parties:** We must respect the trade secrets and software rights of others. We will not engage in unauthorized use, copying, or distribution of software.

2. Use of Company Resources While we are **Agile** and move with purposeful speed, we must use resources responsibly.

- **Data Security:** Markup AI reserves the right to monitor data on company-issued devices in compliance with country-specific laws.
- **Appropriate Use:** We will not tolerate the use of company resources to create or store harassing, sexually explicit, or offensive materials.

3. Media Inquiries To maintain clarity in our communication, all media inquiries should be directed to the VP Marketing.

VII) Legality

Markup AI's commitment to integrity begins with complying with the laws, rules, and regulations where we do business. This particularly includes:

- European and US data protection laws.
 - Employment laws in the countries in which we employ Staff.
 - Competition and antitrust laws.
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VIII) Remedies; Disciplinary Action

In case any breach of this Code has been determined, the Executive Leadership Team (ELT) will decide on the disciplinary action. This may include:

- Admonition or Written Warning
 - Temporary suspension of voluntary benefits
 - Reassignment
 - Termination based on conduct
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IX) Conclusion

It is impossible to anticipate every possible ethical scenario. Because of that, we rely on one another's good judgment to uphold the **CLEAR** values. If you are unsure about the right thing to do, do not be afraid to ask your People Lead, the People Team, or the ELT.