

Code of Conduct

To ensure safety and security and provide the best possible work environment, we expect employees to follow basic, common-sense rules of conduct that will protect everyone's interests and safety. The Code applies to all Company staff, 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 staff.

We expect all Company staff 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 Company staff and clients.

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 a Staff member, vendor or partner of attempting to circumvent a security control.
- Being respectful toward all patrons or customers when you attend events on behalf of the Company of events.

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 a Staff, 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 Staff, allowing any Staff to record another Staff's work time, or allowing falsification of any time card, whether yours or another Staff member;
- Theft or the deliberate or careless damage of any Company property or the property of any Staff 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 Staff'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 Staff the right to maintain a lawfully possessed firearm in a locked vehicle in the employer's parking lot, Staff members will be permitted to maintain a firearm in their own locked vehicle in compliance with the law. Under those circumstances, Staff members 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 Staff members 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 Company staff, including those with decision-making authority, will not be tolerated. Anyone asked to stop unacceptable behavior is expected to comply immediately. If a Company staff member engages in unacceptable behavior, Company leadership may take any action deemed appropriate, up to and including suspension or termination.

Reporting Violations

Staff members 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 Abnormal leader
- People Operations
- Legal / Compliance

When a Staff member 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 Staff 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.

More Information

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.

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. Contact us at ethics@abnormalsecurity.com. Further, our Whistleblower policy can be found attached hereto as Exhibit 1.

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.

Attendance and Punctuality

Employees are expected to be regular in attendance and to be punctual. If employees are absent, their work generally must be performed by others or go undone. To limit problems caused by employees' unapproved absences, we have adopted the following policy.

Employees are expected to report to work as scheduled, be on time and be prepared to start work. Employees are also expected to remain at work for their entire work schedule, except for meal or break periods, or when required to leave on authorized Company business or other authorized reason. Unapproved late arrivals, early departures or other absences from scheduled hours are disruptive and must be avoided.

If an employee is unable to report for work on any particular day, they must call their manager at least one hour in advance of the time the employee is scheduled to begin working for that day (unless it is impossible to do so, in which case the employee must call as soon as possible thereafter). Employees who need to leave early must notify their manager as soon as they learn that they will not be able to complete their scheduled shift. The Company may inquire about the general reason for an absence, tardiness or early departure. Unless extenuating circumstances exist, employees must call in on each and every scheduled day on which they will not report to work, unless they are on an approved leave of absence.

Excessive absenteeism or tardiness may result in disciplinary action up to and including termination of employment, unless the absence or tardiness is excused or approved. The following are examples of types of time off that will not be considered grounds for disciplinary action under this policy:

- Time off that was previously approved, including vacation;
- Paid sick and safe time provided under a mandatory sick and safe time leave law;
- Approved state and federal leaves of absence, including but not limited to jury duty leave, military leave, leave protected under the Family and Medical Leave Act or similar state laws, and time off or leave specifically approved by the Company as an accommodation under the Americans with Disabilities Act or similar state laws; and/or
- Time off due to a work-related injury that is covered by workers' compensation.

Each situation of absenteeism, tardiness or early departure will be evaluated on a case-by-case basis. Even one unexcused absence or tardiness may be considered excessive, depending upon the circumstances. However, the Company will not subject employees to disciplinary action or retaliation for an absence, tardiness or early departure for which discipline may not be imposed under applicable law. If the employee believes that an absence, tardiness or early departure is (or should be) excused pursuant to applicable law, the employee should notify their manager of this fact as soon as possible, but no later than at the time of the absence, tardiness or early departure. (For the required timing of an employee's notice of the need for a foreseeable leave of absence, see the applicable leave policy). If an employee believes they have mistakenly been subject to disciplinary action for an absence, tardiness or early departure that the employee believes is or should be excused/approved, the employee should promptly discuss the matter with their manager or People Operations. The Company will investigate the situation and any errors will be corrected. Employees who fail to report for work without any notification to their manager and whose absence continues for a period of 3 days (No Call / No Show) will be considered to have abandoned and voluntarily terminated their employment, absent extraordinary circumstances.

Personal Appearance

The image Abnormal Security projects to the public is reflected in the appearance of our employees. Simply stated, employees should look well-groomed and should be dressed appropriately for their specific duties. Employees are expected to use good judgment in their appearance and grooming, keeping in mind the nature of the work, their own safety and the safety of coworkers, and their need to interact with the public.

Below are a few guidelines for professional appearance:

- Clothing should not constitute a safety hazard.
- All employees should practice common sense rules of cleanliness and comfort.
- Personal appearance should include cleanliness.

Nothing in this policy is intended to prevent employees from wearing a hair or facial hair style that is consistent with their cultural, ethnic or racial heritage or identity. This policy will be interpreted to comply with applicable local, state or federal law.

The Company will reasonably accommodate exceptions to this policy if required due to an employee's religious beliefs, medical condition or disability. Employees who need such an accommodation should contact their manager or People Operations.

Personal Devices

Employees should only engage in personal phone calls and communications and other use of personal electronic devices during non-working time, including breaks and meal periods. Outside of this time, personal phone calls and use of other personal devices should be kept to a minimum and for emergency use only.

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 a Company staff member's personal interests are inconsistent with those of the Company and create conflicting loyalties. Company staff must avoid situations where his or her 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.

Laws, Rules, and Regulatory Compliance

All Company staff must conduct their business activities in full compliance with all applicable laws and regulations while conducting business on behalf of the Company, and must, without limitation, comply with the following:

Anti-Bribery & Anti-Corruption Policy

Abnormal's policy prohibits bribery in any form. It is Abnormal 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, Company staff 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 Abnormal's commitment to the highest prevailing international anti-corruption standards.

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

Abnormal strictly prohibits engaging in or tolerating bribery or any other form of corruption. No employee will be penalized for refusing to pay a bribe. Our full policy is attached hereto as Exhibit 2.

Antitrust

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

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 a member of the Company staff, 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.

Trade and Export Control Laws.

All Company staff 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.

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, Abnormal Security 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, Company staff 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, Company staff 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).

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.

Employment and Labor

Company is committed to diversity and treating all persons fairly and with dignity and respect. We expect all Company staff to comply with all applicable diversity, equity, and inclusion ("DEI") laws and consider how business decisions affect DEI in our workplace. Abnormal expects our Company staff 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.

Anti-Human Trafficking

Company supports the elimination of modern slavery and human trafficking. Company will not tolerate any human rights abuse or offenses and follow 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, and the UK Modern Slavery Act of 2015, and the Australian Modern Slavery Act 2018. Company regularly reviews its employment practices and performs due diligence to ensure against modern slavery and human trafficking in its supply chains. Our full policy is attached hereto as Exhibit 3.

Health, Safety, & Environment

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

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@abnormalsecurity.com 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.

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@abnormalsecurity.com.

Exhibit 1

Whistleblower & Complaints Policy

Abnormal Security Corporation (“Abnormal Security” or “Abnormal”) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Abnormal Security, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Abnormal Security can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of Abnormal Security’s code of ethics or suspected violations of law or regulations that govern Abnormal Security’s operations.

No Retaliation

It is contrary to the values of Abnormal Security for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Abnormal Security. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

Abnormal Security has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with your Executive Leader. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Abnormal Security’s Head of Legal, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may submit their concerns: (1) in writing directly to their supervisor or the Executive Leader or the organization’s Head of Legal, or (2) to the Abnormal Security Ethics Portal located at ethics.abnormalsecurity.com, including via anonymous submission.

Head of Legal

Abnormal Security’s Head of Legal is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Head of Legal will advise the CEO and VP of Operations and Finance of all complaints and their resolution and any reported issues will be presented to the Board on at least an annual basis.

Accounting and Auditing Matters

The Abnormal Security VP of Operations and Finance shall immediately notify the Board of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. Acting in good faith means that the report is made with sincerity and honesty; it does not matter whether the report proves true or not.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Abnormal Security will make every effort to safeguard the confidentiality (and, if applicable, the anonymity) of any persons reporting potential misconduct.

Handling of Reported Violations

Abnormal Security's Head of Legal will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

More Information

Anyone in violation of this policy is subject to the sanctions as described in the Disciplinary Actions Policy. This policy is owned by the Legal team. Contact us at legal@abnormalsecurity.com.

Exhibit 2

Anti-Bribery & Anti-Corruption Policy

Purpose

To demonstrate and reflect the commitment to the highest prevailing international anti-corruption standards at Abnormal Security Corporation (“Abnormal”). This policy is designed to ensure the organization complies with the letter and the spirit of anti-corruption laws in the United States and every other jurisdiction in which we do business.

Scope

This policy is applicable to Abnormal, its subsidiaries and affiliates worldwide. Where specific conduct may be permitted under this policy but is prohibited by local law, Abnormal employees must comply with local law. Managers are responsible for ensuring that their teams comply with this policy. Where additional guidance is needed, please contact the Head of Legal.

All full-time employees, part-time employees, contractors, and interns (“employees”) of Abnormal, and its direct and indirect subsidiaries, are subject to this policy. As discussed more fully below, it also applies to third parties acting on Abnormal’s behalf. All employees are expected to become familiar with and comply with this policy, to participate in training, and to communicate the values underlying this policy in interactions with colleagues and third parties.

Requirements

This policy requires the following:

Abnormal’s policy prohibits bribery in any form. It is Abnormal 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. This policy demonstrates and reflects Abnormal’s commitment to the highest prevailing international anti-corruption standards.

In particular, as a corporation domiciled in the United States, Abnormal is subject to the United States Foreign Corrupt Practices Act (“FCPA”). The UK Bribery Act 2010 applies to Abnormal 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 Abnormal 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.

Abnormal strictly prohibits engaging in or tolerating bribery or any other form of corruption. No employee will be penalized for refusing to pay a bribe.

I. Policy Details

A. Public Bribery – Prohibition of Bribery of Government Officials

This policy strictly prohibits Abnormal and its officers, directors, employees and agents from offering, promising or giving anything of value to a Government Official, directly or indirectly, with the intention of influencing such official in their capacity as a Government Official to obtain or retain business or obtain or retain a business advantage.

This policy prohibits an offer or promise of a bribe, even if the Government Official rejects the offer, or it fails to bring about the desired outcome.

1. *What is “Anything of Value”?*

Under this policy the term “anything of value” is broadly defined to include both financial and other non-financial advantages. Things of value include, for example, gifts, entertainment, favors, services, loans and loan guarantees, the use of property or equipment, job offers, transportation, and the payment of expenses or debts.

This policy does not recognize any “small payment” exception for payments made with an intention to bribe. Specifically, this policy prohibits “speed,” “grease” or “facilitation” payments, which include payments made solely to expedite or secure the performance of routine actions such as: (1) obtaining licenses, permits and other official documents to qualify to do business in a foreign country; (2) processing governmental papers, such as visas and work orders; (3) providing police protection, mail services and inspection of goods or of contract performance; (4) providing telephone service, utilities, loading or unloading cargo and protecting perishable goods from deteriorating; and (5) actions of a similar nature.

It may be permissible, in relation to Abnormal’s business with a Government Official, to incur expenses in connection with the legitimate promotion or demonstration of Abnormal’s services and products. Such expenses are discussed more fully below.

2. *Who is a “Government Official”?*

The term *Government Official* is broadly defined to include any individual who holds a legislative, administrative or judicial position of any kind, whether appointed or elected; who exercises a public function; or who is an official or agent of a public international organization (such as the United Nations, the World Bank or the International Monetary Fund). *Government Official* also includes any official of a political party, and any candidate for political office.

In addition, under this policy, *Government Official* refers to any executive, officer, agent or employee of a government-owned or government-controlled business (such as a state-owned bank or utility, a sovereign wealth fund, or a public university).

Finally, under this policy, *Government Official* includes any person who is acting in an official capacity for the entities described above, including a private consultant who also holds a position with, or acts on behalf of, a government or with a public international organization, or with an enterprise owned or controlled by a government.

3. What is an “Improper Advantage”?

- Giving or agreeing to give a Government Official a thing of value that could violate this policy may arise in varied settings. Bribery concerns do not arise solely in the context of trying to win a contract or business. Governing law and Abnormal policy prohibit payments designed to secure any business advantage. By way of example, improper payments or benefits must not be conveyed to a Government Official:
 - To influence the award of a government contract;
 - to prevent some governmental action, such as the imposition of a tax or fine;
 - to obtain confidential information about business opportunities, bids or the activities of competitors;
 - to obtain a permit or license, other than to cover appropriate application fees;
 - to obtain relief or exemption from government controls or regulations of any kind; or
 - to affect the nature of regulations or the application of regulatory provisions.

B. Private Bribery: Prohibition of Bribery in the Private Sector

Abnormal and its officers, directors, employees and third-party agents are prohibited from offering, promising or giving anything of value to a private person, directly or indirectly, with the intention of inducing a person to improperly perform a relevant function or activity (such as his or her work) or to reward a person for having improperly performed a relevant function or activity.

This policy prohibits an offer or promise of a bribe, even if the private person rejects the offer, or it fails to bring about the desired outcome.

It is permissible, in relation to Abnormal’s business with private persons, to incur reasonable, proportionate and good faith expenses in connection with the promotion of Abnormal’s services and products and in the provision of corporate hospitality. Such expenses are discussed more fully below.

C. Solicitation, Extortion, Health and Safety

Bribery payments are prohibited even if they have been requested or demanded by a Government Official or if the Government Official threatens adverse action against Abnormal unless a payment is made.

If a payment is made to protect an employee’s health and safety, it must be immediately reported to the Head of Legal and must be accurately recorded in Abnormal’s books and records to reflect the amount and purpose of the payment. If at all practicable, contact should be made with the Head of Legal before such a payment is made. If prior consultation is not practicable, the fact of payment and the circumstances should be reported as soon as possible thereafter.

D. Conflicts of Interest and Kickbacks

Conflicts of interest arise when a personal interest interferes or even appears to interfere with Abnormal’s best interests. It is a duty for all employees to at all times act in the best interests of

Abnormal. Employees are required to be familiar with Abnormal’s policies about conflicts of interest (see the Employee Handbook). A conflict of interest can escalate to the level of bribery when an employee requests, agrees to receive or receives anything of value (whether financial or otherwise), in a manner that interferes with the employee’s judgment in performing their functions on behalf of Abnormal. Abnormal’s policy strictly prohibits receiving bribes, kickbacks, or improper benefits.

E. Books, Records and Accounting

Abnormal is required to maintain books and accounting records that accurately reflect all transactions in reasonable detail. These record-keeping requirements apply to all payments, not merely those that would be material in the traditional financial sense.

Officers, directors, employees and third parties are prohibited from manipulating books or records in an effort to mask transactions, either by characterizing them in some oblique way, or by omitting them from Abnormal’s books or records entirely. Accordingly, no undisclosed or unrecorded accounts may be maintained for any purpose.

F. Penalties Are Severe

In a situation where an employee of any company is found to have violated the law, the company itself may face harsh penalties, including significant fines. In addition, such a company may be precluded from doing business with government entities in the US, Europe and elsewhere. Individuals who violate the law may be subject to imprisonment.

II. Meals, Entertainment, Travel, and Gifts

It is permissible under this policy to incur certain expenses for a Government Official that are directly related to the promotion or demonstration of Abnormal’s services and products. In addition, this policy allows reasonable meal and entertainment expenses for private persons in the context of establishing and maintaining appropriate business relationships. As discussed more fully below, any such expenses must be reasonable and appropriate.

In all interactions – both in the public and private sector – hospitality and promotional expenses may not be used to exert improper influence. Thus, even reasonable expenses are prohibited if they are for the purpose of improperly influencing a business or regulatory decision, or if they are to reward a person for having improperly performed a relevant function or activity.

Finally, a benefit (even if considered reasonable under this policy) may not be conveyed if the recipient is not permitted to accept it; for example, because the recipient’s company policy forbids it or it is prohibited under local law or regulation.

All promotional expenses must also be fully documented, supported by original receipts, properly approved, and submitted in accordance with the following procedures, and any other procedures governing expense authorization and approval policies and procedures.

A. Meals, Gifts, and Entertainment of Government Officials

Meals, entertainment, and gifts are “things of value” under this policy, and may never be provided to a Government Official for the purpose of influencing a Government Official to obtain or retain business or to secure a business advantage. Lavish meals, extravagant entertainment or cash gifts are never appropriate.

Meal and related entertainment expenses for a Government Official paid by Abnormal require the prior written approval of the Head of Legal. If it is not feasible to obtain such prior approval, meal and related entertainment expenses for a Government Official may be incurred without such prior approval by the Head of Legal only if all of the following conditions are met:

1. The meal or entertainment occurs in connection with substantive business meetings, occurs in the same general location as such meetings, and is attended by appropriate Abnormal representatives;
2. The value of the meal or entertainment expenses are consistent with applicable entertainment or expense policy;
3. The entertainment or meals are permitted under applicable U.S. and local written laws, as well as any rules or regulations of the recipient's employer; and
4. The expenses are properly recorded and approved in accordance with Abnormal's policies.

The Head of Legal should be informed of any such expenditures as soon as possible after they are incurred.

Gifts to a Government Official should only be given as a goodwill gesture, and gifts may never be provided for the purpose of obtaining or retaining business or any improper advantage. Cash gifts are never permitted. Any items provided to a Government Official should be limited to logo gifts and may be provided only if the following conditions are met:

1. The item is of nominal value bearing Abnormal or a subsidiary company's logo.
2. The gift is permitted under applicable U.S. and local written laws, as well as any rules or regulations of the recipient's employer; and
3. The expenses involved are properly recorded and approved in accordance with Abnormal's policies.

Gifts that do not meet all of the foregoing criteria must be reviewed and approved in advance by the Head of Legal in writing.

B. Travel for Government Officials

At times, Abnormal may be requested to pay the travel and lodging expenses of a Government Official in connection with trips to meet with Abnormal representatives, or attend seminars sponsored by Abnormal. Reimbursements by Abnormal for such expenses on behalf of a Government Official require the prior written approval of the Head of Legal.

Reimbursement is generally acceptable where the expenses relate to reasonable and bona fide travel, accommodation and meal expenses in connection with a contract between Abnormal and the government, or the demonstration of Abnormal capabilities relating to proposed business

with the government. Wherever possible, Abnormal should arrange to directly reimburse expenses to the governmental entity rather than reimburse the Government Official personally.

In no case should reimbursements be made:

1. By cash payment directly to a Government Official;
2. For expenses relating to family members or other persons accompanying a Government Official;
3. For expenses relating to destinations that are not directly related to Abnormal's facilities, products, or services; or
4. For travel expenses in excess of those that would likely be incurred by Abnormal's employees of equivalent status as the Government Official if such Abnormal employees were to travel to the same destination.

C. Private Hospitality

In the private sector, hospitality may never be provided if the purpose is to improperly influence a person in the performance of his or her duties, or to reward improper performance of his or her duties.

Reasonable, proportionate hospitality made in good faith in interactions with private persons and entities is permitted for purposes of establishing and maintaining business relationships.

Meal and related entertainment expenses for private persons may be incurred without prior approval by the Head of Legal only if all of the following conditions are met:

1. The meal or entertainment occurs in connection with substantive discussions of Abnormal's services and is attended by appropriate Abnormal representatives;
2. The value of the meal or entertainment expenses are consistent with applicable entertainment or expense policy;
3. The entertainment or meals are permitted under applicable laws, as well as any rules or regulations of the recipient's employer; and
4. The expenses are properly recorded and approved in accordance with Abnormal's policies.

Abnormal hosts a number of annual promotional and educational events. Employees must take particular care in inviting a businessperson to these events if there is a business decision expected or pending with the person's employer that could benefit Abnormal. Questions regarding the appropriateness of extending an invitation to a promotional or educational event should be presented to the Head of Legal.

III. Political Contributions

No Abnormal funds, assets, services, or facilities shall be contributed to any politician, candidate for political office, political party, or political action committee without the prior written approval of Abnormal's Chief Executive Officer (CEO), whether or not the written laws of the relevant country allow such payments. A "political contribution" includes not only monetary contributions, but also payments for fundraising dinners or other material support.

All of the following criteria must be met when Abnormal makes a political contribution to a politician, candidate for political office, political party, or political action committee in a foreign country:

- A. Compliance with Local Law: The Head of Legal must be consulted and provide confirmation that such a payment is legal under the applicable foreign country's law.
- B. CEO Approval: Abnormal's CEO must approve any political contribution before any payment is made. The request for approval must be written and include information sufficient to prove the political contribution is bona fide.
- C. Record Retention: All documents pertaining to the contribution, including documents described in paragraphs (a) and (b), should be forwarded to the Accounting Department and to the Head of Legal for Abnormal's compliance files.

IV. Donations to Charities and Event Sponsorships

Charitable donations and event sponsorships may be used as a means to conceal a bribe. Even bona fide donations could be construed as an attempt to influence a Government Official or another person.

Accordingly, donations to charities and event sponsorships must not be made in an effort to obtain or retain business or a business advantage for Abnormal with a Government Official or any other private person, or company. The following procedures must be observed before making a donation of Abnormal funds, assets, services, or facilities to a charitable entity or in connection with an event sponsorship (these are in addition to, not in lieu of, any other applicable expense or authorization policy or procedure):

- A. If the donation involves a Government Official (including an event honoring a Government Official or an organization established or controlled by or named after a Government Official), written notice must be provided to the Head of Legal: This notice should describe the charity, the identity of the party requesting the donation, the names of persons contacted at the charity, the amount of the proposed contribution and any supporting documentation should be submitted. Head of Legal, in consultation with the Legal Department, must first determine that the contribution fully complies with local law before any donation is made. All documents relating to the donation, including documents should be forwarded to the Accounting Department and to the Head of Legal for Abnormal's compliance files.
- B. If the donation does not involve a Government Official, appropriate due diligence must be performed to ensure that the recipient of the donation is a bona fide and legitimate organization (the organization must be a legitimate charitable organization in the case of a charitable contribution). Unless the recipient entity is both known to Abnormal and to the general business community, this diligence should include documented research to confirm that the recipient is a legitimate charitable entity.

V. Relationships with Agents and Business Partners

A. Agents

The use of an agent, consultant, intermediary, or other third party to pay or give a bribe is prohibited. The actions of third parties present particular risks due to limited oversight from Abnormal. In certain circumstances, Abnormal and its employees can be held liable for improper

payments made by a third party even if Abnormal did not have actual knowledge of the payment. Accordingly, this policy provides for strict due diligence and controls when dealing with third parties who may interact with a Government Official or who may interact with private parties for or on behalf of Abnormal. Whenever Abnormal seeks to engage a consultant, agent, representative, subcontractor, or other third party (“Agent”) in a context in which the Agent may interact with a Government Official or act for or on behalf of Abnormal in private matters, the following guidelines must be followed:

1. Due Diligence

Due diligence must be performed to ensure that the agent is a bona fide and legitimate entity; is qualified to perform services for which it will be retained; and maintains standards consistent with Abnormal’s ethical and reputational standards. Diligence should be tailored to the particular corruption risks of the situation and be undertaken in accordance with applicable Abnormal Policies. In appropriate circumstances, this diligence may include external research and confirmation of the Agent’s qualifications, and an in-person meeting or interview with the principals of the agent. In addition to public profile information, it may be appropriate to have the agent respond to written questions regarding its structure, history, connections to Government Officials, and references.

2. Record Retention:

All documents relating to the diligence must be retained for seven years following the end of the Agent’s work on the project. Diligence should be enhanced if there are red flags of improper activity, such as the following:

- unusual or excessive payment requests, such as requests for over-invoicing, up-front payments, unusual commissions, or mid-stream compensation payments;
- requests for payments in a different country, to a third party, to a bank account outside of the country in which the Agent operates, or in cash or other untraceable funds;
- a close relationship between the representative and a Government Official or commercial counterparty;
- any refusal or hesitancy by the Agent to promise in writing to abide by Abnormal policy and governing law;
- charges against the Agent for violation of local or foreign laws, or regulations concerning the award of government or other contracts;
- a demand or strong suggestion by a Government Official or commercial counterparty that a particular Agent should be retained;
- reliance by the Agent on government or business contacts as opposed to knowledgeable staff and investment of time to promote Abnormal’s interests; or
- the Agent expresses a desire to keep his representation of Abnormal or the terms of his retention secret.

3. *Written Contract*

Agreements with Agents must be in writing and must describe the services to be performed, the basis for compensation of the Agent, the amounts to be paid, and other material terms and conditions of the representation. Written agreements must contain the following provisions:

- A representation that the Agent will remain in compliance with all relevant anti-corruption laws, including the FCPA. The Agent should be required periodically to certify its compliance with laws, and to notify Abnormal of any breaches of compliance with anti-corruption laws.
- A provision allowing Abnormal to terminate the contract if Abnormal believes, in good faith, that the Agent has breached relevant anti-corruption laws or the FCPA.
- A provision that requires the Agent to respond to reasonable requests for information from Abnormal regarding the work performed under the agreement and related expenditures by the Agent.

Agreements with Agents who may interact with Government Officials must be reviewed and approved by the Legal Department.

4. *Supervision*

The Abnormal Business Contact (the person in Abnormal's business unit who is procuring the services of the Agent) is responsible for supervising the Agent and monitoring the Agent's conduct at a level commensurate with the risks associated with the Agent's activities.

5. *Payment Procedures*

Payments to an Agent should never be made in cash, and should be made directly to the Agent's bank account in the country where the services are performed or where the Agent's offices are located. Payment to other locations must be approved in advance by the Head of Legal.

6. *Business Partnerships and Co-Promotion Activities*

From time to time, Abnormal may partner with another entity ("Business Partner"). Such combinations could present legal and reputational risks to Abnormal, if the conduct of the Business Partner is inconsistent with Abnormal's policy or in violation of relevant anti-corruption laws. Accordingly, Abnormal should perform appropriate diligence of potential Business Partners in such circumstances. In addition, Abnormal should obtain written agreement that the Business Partner will act in compliance with all relevant anti-corruption laws in connection with proposed business.

B. *Joint Ventures and Business Combinations*

In considering and executing joint ventures and other business combinations, Abnormal must ensure that there is appropriate due diligence of the potential partner, and that there are appropriate legal protections in agreements with the partner. Because each transaction is likely to involve unique factors, the Head of Legal should be consulted early in the process regarding an appropriate due diligence work plan, and appropriate representations, warranties, and covenants.

More Information

If employees have any doubts or questions as to whether their conduct is permissible under governing law or this policy, they should contact the Head of Legal at Legal@abnormalsecurity.com.

Anyone in violation of this policy is subject to the sanctions as described in the Disciplinary Actions Policy. This policy is owned by the Ethics and HR team. Contact us at ethics@abnormalsecurity.com.

You may ask questions about this policy or report suspected violations by contacting the Head of Legal or any member of the Legal Department.

Exhibit 3

Abnormal Security Corporation Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement (“Statement”) addresses the reporting requirements set out in section 54(1) of the United Kingdom Modern Slavery Act of 2015 (the “Modern Slavery Act 2015”) and the Australian Modern Slavery Act 2018 (the “Australian Act”). The Modern Slavery Act 2015 and Australian Act require certain businesses to disclose their modern slavery risks and efforts to mitigate those risks in their operations and supply chains.

This Statement is given on behalf of Abnormal Security Corporation, which is a reporting entity for the purposes of the Australian Act, and its subsidiaries (collectively, “Abnormal”). Abnormal is committed to complying with modern slavery laws and effectively managing its modern slavery risks. Abnormal strives to act ethically and with integrity in all of its business relationships, which means that Abnormal takes great effort to implement and enforce effective systems and controls, including those that would address the risks of modern slavery practices occurring in Abnormal's operations or supply chain.

In this Statement, the collective expressions 'Abnormal', 'we', 'us' and 'our' are used conveniently to refer to Abnormal Security Corporation and its subsidiaries. This is because, in relation to modern slavery risk assessment and management, we operate using group-wide policies and procedures. It is not intended to convey how we are structured, managed or controlled.

Organization Structure and Operations

Abnormal offers a unique multi-tenant SaaS platform that is designed to protect organizations from the most sophisticated and targeted cybersecurity attacks. Abnormal Security Corporation is a private company incorporated in Delaware and headquartered in San Francisco, California, but has operations through its subsidiaries and various regional offices in a number of markets throughout the world, including the United Kingdom through its subsidiary Abnormal Security UK Ltd. and in Australia through its subsidiary Abnormal Security Australia Pty Ltd.

Operations and Risks

Overall, due to the nature of Abnormal's business as a developer and provider of a SaaS platform, Abnormal considers itself to be low risk with respect to modern slavery practices in its operations. This is based on an assessment of Abnormal's geographical footprint against the Global Slavery Index's list of high, medium, and low risk countries. Abnormal primarily operates in lower geographic risk countries, including in the United States, Europe, and Australia. Abnormal also operates in Singapore which is recognized by the Global Slavery Index as medium risk. In the event Abnormal begins operating in higher risk areas, Abnormal will continue to assess and revise our systems and controls to ensure we mitigate our risks with respect to modern slavery.

The Abnormal workforce is primarily made up of skilled full-time employees, which further supports our low-risk status. Abnormal does, however, engage some contractors, which is addressed further below.

Supply Chain and Risks

Abnormal suppliers primarily provide software, software-as-a-service, professional services, and finished physical products, such as computer hardware, office equipment, and related goods. Abnormal does not directly manufacture goods, supplies or physical products.

Overall, due to the nature of Abnormal's business and taking into account modern slavery risk factors, Abnormal considers itself to be low risk with respect to slavery and human trafficking issues in its supply chain. However, Abnormal recognizes that risks of modern slavery and human trafficking can exist for global organizations, especially with regards to suppliers to the IT and software sector linked to electrical product manufacturing, which is a known high-risk sector.

Although some of the goods and services that Abnormal procures may be in a higher risk sector (e.g., computer hardware, cleaning services, security, telecommunications), Abnormal strives to source goods and services from reputable third parties and we continue to enhance our supply chain selection and management processes with these risks in mind. Abnormal suppliers and partners are predominantly based in the United States and Europe and are mostly technology and services providers. Only a very small percentage of Abnormal suppliers provide hardware, and those vendors are also typically large, multinational companies, with their own company codes of conduct, often including human rights commitments. Our technology and services providers include Amazon.com, Inc., Google LLC, Salesforce.com, Inc., and Microsoft Corporation, each of which have stated codes of conduct and ethics.

Additionally, Abnormal generally uses placement and recruiting agencies to source independent contractors for its workforce, and these agencies are selected following a standard sourcing process. All workers employed by Abnormal and its suppliers are subject to background checks, as allowed under applicable local law. Abnormal contractually requires its suppliers to adhere to applicable laws, including employment laws related to child labor, wages, working hours, and working conditions. Further, if Abnormal learns that any party has acted in a manner inconsistent with its ethical standards, Abnormal will take appropriate action, including termination of the relationship.

Abnormal Policies and Values

Abnormal believes that its corporate culture has been a critical component to its success. Abnormal has invested substantial time and resources in building its team and ensuring that the type of people it employs and works with have high moral standards and integrity. The Abnormal workforce celebrates diverse perspectives and unique identities, respects each other, and makes a real impact every day.

Abnormal employees, vendors, and contractors are also required to adhere to a Code of Conduct (the "Code"). The Code reflects the business practices and principles of behavior that support our values and is updated regularly. Among other things, the Code sets forth guidelines regarding:

- Acceptable behavior;
- Laws, rules, and regulatory compliance;
- Conflicts of interest;
- Gift policy; and
- Outside employment.

The Code also includes mechanisms for dealing with violations, encouraging reporting and redressing concerns.

In accordance with these guidelines and values, Abnormal aims to ensure that it hires and works with people who possess high ethical standards and integrity and who have zero tolerance towards any sort of modern slavery or human trafficking.

Controls and Due Diligence Processes

To ensure that Abnormal contractors and all those in the Abnormal supply chain comply with Abnormal values, Abnormal shall require suppliers and partners to comply with all applicable laws. Abnormal also may require certain suppliers and partners to adhere to the Code, or to certify that they have implemented their own code of conduct with the same effect. However, we recognize that in order to manage its growth and increasing risks effectively and sustainably, Abnormal must continue to improve its operational, financial, and management systems and controls by, among other things:

- effectively attracting, training, and integrating a large number of new employees, particularly members of sales and marketing teams and employees and consultants in all jurisdictions;
- enhancing information, training, and communication systems to ensure that employees are well-coordinated, well-informed, and can effectively communicate with each other and customers; and
- when entering into new contracts, undertake due diligence to ensure that the parties with whom we are doing business have the relevant policies and procedures in place to address modern slavery risks.

Abnormal believes that no individual should be subjected to any form of modern slavery and will continue to review its processes to take necessary steps within its power to prevent this from existing within its business and supply chains. Abnormal is committed to engaging with and educating its suppliers and workforce regarding modern slavery risk identification and mitigation.

A component of the Abnormal growth strategy involves the further expansion of its operations and customer adoption internationally. Operating in international markets requires significant resources and management attention and subjects Abnormal to regulatory, economic, and political risks that are different from those in the United States — e.g., the Modern Slavery Act 2015 and the Australian Act. Abnormal monitors and updates its policies in response to changing legislation and keeps its employees informed through appropriate training and updates.

Governance

To ensure that Abnormal is successful in continuing to implement the foregoing efforts, the Abnormal Legal Department and PeopleOps Team oversee program responsibilities, which include:

- investigating possible violations;
- requiring contractors and vendors to alert the company and relevant authorities of possible violations;
- training new employees;
- conducting regular training sessions to maintain employees' understanding of the issues;
- obtaining annual confirmations from employees as to compliance with applicable policies;
- updating policies as needed and alerting employees to any updates; and
- otherwise promoting an atmosphere of responsible and ethical conduct.

Any employee, contractor, or third party can contact the Abnormal Legal Department by emailing legal@abnormalsecurity.com.

Abnormal has zero tolerance in relation to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with Abnormal's values, Abnormal has in place mechanisms for our employees, suppliers, and third parties to ask questions or to report concerns about possible violations of Abnormal policies and applicable laws, including those related to modern slavery.

Looking Ahead

Compliance with the Modern Slavery Act 2015 and the Australian Act is an ongoing commitment. As an organization, Abnormal is continuing to develop the way it works to ensure that modern slavery risks are effectively identified and managed throughout our operations and supply chains. Going forward, we intend to continue to engage with key suppliers to improve modern slavery risk awareness, review relevant policies and explore opportunities for collaboration and partnerships to combat modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and section 13 of the Australian Act and constitutes Abnormal's slavery and human trafficking statement for the financial year ending 31 January 2023.