



# Chainalysis Global Code of Business Conduct and Ethics

Effective: November 28, 2023



# Table of Contents

<b>Table of Contents</b>	<b>2</b>
<b>Section 1: Introduction to the Code</b>	<b>3</b>
1.1 Objective and Scope	3
1.2 Applicability and Expectations	4
<b>Section 2: Our Values</b>	<b>4</b>
<b>Section 3: Our Policies</b>	<b>5</b>
3.1 Integrity	5
a. Legal Compliance	5
b. Conflicts of Interest	5
I. Responsibility and Reporting	6
II. Moonlighting and Side Projects	6
c. Confidential Information	6
d. Insider Trading	7
3.2 Business Ethics	8
a. Fair Dealing	8
b. Financial Integrity	8
c. Antitrust	9
3.3 International, Regulatory, and Government	9
a. International Business Laws and Norms	9
b. Anti-Money Laundering	10
c. Anti-Bribery and Anti-Corruption: Gifts and Entertainment	10
d. Trade Restrictions	10
e. Customer Vetting	11
3.4 Corporate Responsibility	11
a. Anti-Harassment and Discrimination	11
b. Commitment to Human Rights	12
c. Commitment to Sustainability	12
d. Use of Company Property	12
<b>Section 4: Code Questions and Reporting</b>	<b>13</b>
4.1 Questions	13
4.2 Reporting Obligation	13
4.3 Commitment to Non-Retaliation	13
4.4 False and Misleading Reports	14
4.5 Contact Methods	14
4.6 Inquiries and Investigations	15
<b>Section 5: General</b>	<b>16</b>
5.1 Consequences of Non-Compliance with this Code	16
5.2 Waivers	16
5.3 Annual Training and Acknowledgement	16
5.4 Dissemination and Amendment	16

# Global Code of Business Conduct and Ethics

## Section 1: Introduction to the Code

### 1.1 Objective and Scope

Chainalysis is committed to maintaining the highest standards of business conduct and ethics. This Code of Business Conduct and Ethics (this “**Code**”) reflects our business practices and principles of behavior that support our commitment. References to “**Chainalysis**,” “**we**,” “**us**,” or “**our**” in this Code refer to Chainalysis Inc. and its subsidiaries.

While this Code covers a wide range of topics relating to business conduct and ethics, it does not address all of our potential legal, regulatory, or ethical responsibilities, and it is not the only document that relates to acceptable conduct at Chainalysis. Rather, it is intended to act as a guideline and minimum requirement that must always be followed. Chainalysis maintains other more detailed policies, codes, and handbooks related to particular responsibilities, conduct, and other topics, including those referenced herein, that you should review separately. For instance, such other materials include:

- region-specific Employee Handbooks, which include, among other things, policies relating to harassment and discrimination;
- the Anti-Bribery and Anti-Corruption Policy, which supplements this Code and provides additional responsibilities applicable to all directors, officers, employees, agents, representatives, joint-venture and teaming partners, re-sellers, prime and subcontractors, and others working on behalf of or representing Chainalysis; and
- the Public Sector Code of Conduct Supplement (the “**PubSec Supplement**”), which augments this Code and provides additional responsibilities applicable to employees engaged in negotiating, performing, or supporting contracts, subcontracts, or other agreements related to Public Sector customers.<sup>1</sup>

---

<sup>1</sup> “Public Sector customers” are any agency, organization, or entity that is within (or is substantially owned, funded, managed, or controlled by): the executive, legislative or judicial branches of any government within the U.S. (federal, state, or local) and its territories, or by any other country’s government at any level; quasi-governmental entities (such as the World Bank); or international governing/regulatory bodies (such as European Union institutions); and publicly funded institutions (such as colleges, universities, and hospitals). This definition includes the employees, representatives, agents, contractors, and subcontractors of the above agencies, organizations, or entities.

If you have any questions about this Code, please reach out to the Chainalysis Compliance Team via the methods described in Section 4.

## 1.2 Applicability and Expectations

Compliance with this Code is mandatory for all employees, employees of record, officers, members of the Chainalysis board of directors (the “**Board**”), and others working on behalf of or representing Chainalysis. Chainalysis also requires its business partners to comply with this Code or to have adopted a code of business conduct and ethics of equivalent scope. All persons and entities to whom this Code applies are collectively referred to herein as “**providers**” or “**you.**”

When acting for or on behalf of Chainalysis, you are at all times expected to:

- conduct yourself in a legally and ethically compliant manner and consistent with this Code and other Chainalysis policies, procedures, guidelines, and practices;
- apply good judgment, common sense and the highest personal ethical standards when making business decisions; and
- be familiar with applicable laws and regulations in your area of operation. Any questions about laws and regulations should be addressed to the Chainalysis Legal Team via the methods described in Section 4.

## Section 2: Our Values

Chainalysis observes the following company values:

- **Build Trust** - take every chance to build trust in your team, Chainalysis, and the industry
- **Earn the Right** - don't rest on your laurels, we re-earn our rights every day
- **Rigor** - question everything, be data-driven and deliver high quality work
- **Team First** - success comes through collaboration
- **Strong Convictions/Loosely Held** - act on today's information, not yesterday's

Further information on company values can be found [here](#).

## Section 3: Our Policies

At Chainalysis, we promote the highest standards of integrity by conducting our affairs in an honest and ethical manner. Our integrity and reputation depends on the honesty, fairness, and integrity brought to their jobs everyday by all employees. This also includes respect and integrity when interacting with each other and other third parties.

### 3.1 Integrity

#### a. Legal Compliance

Obeying the law is the foundation of this Code. Our success depends upon all of you operating within legal guidelines and cooperating with national, state, and local authorities in the U.S., and around the world. We expect all of you to understand the legal and regulatory requirements applicable to your business units and areas of responsibility. You also are expected to use good judgment, common sense, and the highest personal ethical standards in seeking to comply with all applicable laws, rules, and regulations. If you have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your manager, or the Legal Team via the methods described in Section 4.

#### b. Conflicts of Interest

We expect our providers to act in the best interests of Chainalysis and to refrain from engaging in any other employment, occupation, consulting relationship, commitment, or activity or having a personal interest that presents—or even gives the appearance of—a “conflict of interest.” A “conflict of interest” occurs when your personal interest (including interests of a member of your family) hinders your ability to perform your Chainalysis duties and responsibilities honestly, objectively, and/or effectively, or otherwise interferes with the interests of Chainalysis.

Whether or not a conflict of interest exists depends on the circumstances, but some situations that could be considered conflicts of interest include:

- soliciting or accepting gifts, favors, loans, benefits, or preferential treatment from any person or entity that does business or seeks to do business with us;
- selecting vendors, customers, other business partners, and new hire candidates based on any considerations other than the best interest of Chainalysis;
- owning a significant financial interest in an entity that does business, seeks to do business or competes with Chainalysis; for the avoidance of doubt, an investment by a professional

investment fund affiliated with a member of our Board shall not, by itself, be considered a conflict of interest;

- using Chainalysis assets for personal purposes;
- engaging in other employment, occupation, consulting relationships, or commitments (a) directly related to Chainalysis's business or (b) for or on behalf of a competitor, customer, or vendor of Chainalysis;
- allowing a member of your family to receive improper benefits as a result of your position with Chainalysis; and
- certain types of "moonlighting" (see below for additional detail).

**Government Contracts Supplement:** For additional information regarding preventing conflicts of interest in compliance with the U.S. Federal Acquisition Regulation (FAR) and in connection with Chainalysis's performance of government contracts, please refer to the [Employee Handbook for U.S. employees](#).

## I. Responsibility and Reporting

It is the responsibility of each provider to avoid not only any situation that is a conflict of interest, but also to be aware of situations that might appear to be a conflict, as they might not be in the best interest of Chainalysis. Also, you must fully cooperate in the remediation of any situation in which a conflict exists or may arise.

If you have any questions about a potential conflict of interest, or wish to report a potential conflict of interest, please reach out to the Compliance Team via the prescribed methods described in Section 4.

## II. Moonlighting and Side Projects

Chainalysis recognizes that employees may want to engage in outside activities and projects, and it supports its employees when those activities and projects do not conflict or interfere with their ability to perform their duties or act in the best interest of Chainalysis. However, you may not take personal advantage of opportunities for Chainalysis that are presented to you or discovered by you as a result of your position with us (or services provided to us) or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. All moonlighting opportunities are subject to review and approval by the People Team, your executive leader and the Legal Team.

Further details on moonlighting and side projects and the required approval process can be found in the applicable regional [Employee Handbook](#).

### **c. Confidential Information**

While working for Chainalysis, you will be privy to confidential information of Chainalysis and other third-parties. All non-public information of or about Chainalysis, our products, services, plans, trade secrets, customers, employees, partners, or other third-parties with which we do business is considered “**confidential information**.” Importantly, all customer information is confidential information. Unauthorized disclosure of any confidential information is prohibited, and providers must take appropriate precautions to safeguard confidential information and ensure that it is communicated within Chainalysis only to those who have a need to know such information to perform their responsibilities.

All Chainalysis emails, voicemails, slacks, and other communications are presumed confidential to Chainalysis and should not be forwarded or otherwise disseminated to individuals outside of Chainalysis, except where required for Chainalysis-related business reasons.

Failure to safeguard such information may significantly harm Chainalysis and its competitive position, and the use of such confidential information for any purpose except to conduct our business is unlawful and may lead to civil and/or criminal liability.

Your obligation to treat certain information as confidential does not end when you leave Chainalysis, and you will be prohibited from disclosing any confidential information to a new employer or to others after leaving. All employees are required to sign either a Confidential Information, At-Will Employment, Arbitration and Invention Assignment Agreement, or an employment agreement, with Chainalysis which provides additional detail on your confidentiality obligations that are not contained in this Code.

### **d. Insider Trading**

Providers who have access to confidential information are not permitted to use or share that information for purposes of trading in Chainalysis securities or in securities or digital assets of another company. All material, non-public information about Chainalysis or about companies with which we do business is considered confidential information. You may also have access to material, non-public information about other third-parties in the course of your services to Chainalysis. To use material, non-public information in connection with buying or selling securities or digital assets, including “tipping” others who might make an investment decision on the basis of this information, is both unethical and illegal, and may be subject to disciplinary action. You must exercise the utmost care when handling material non-public information.

## 3.2 Business Ethics

### a. Fair Dealing

Chainalysis strives to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our solutions and services, not through unethical or illegal business practices. Providers are expected to deal honestly, ethically and fairly with customers, partners, vendors, competitors, and other third parties. This includes:

- ensuring clear and precise communication in our contracts, advertising, literature, and other public statements, and attempting to eliminate misstatements of fact or misleading impressions;
- reflecting accurately on all invoices to customers the sale price and terms of sale for products and services sold or rendered;
- protecting all proprietary data that is provided to us by customers, partners, vendors, employees, or developed by us as reflected in our agreements and policies or as compelled by law; and
- prohibiting our representatives from otherwise taking unfair advantage of our customers, partners or vendors, or other third parties, through manipulation, concealment, abuse of privileged information, or any other unfair-dealing practice.

Be aware that the Federal Trade Commission Act provides that “unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful.” It is unlawful to engage in deceptive, unfair, or unethical practices, and to make misrepresentations in connection with sales activities.

### b. Financial Integrity

The integrity of our records, reports, presentations, and other materials that we use internally and share with third parties (collectively, our “**financial records**”) depends upon the validity, accuracy, and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees, and others.

We also rely upon our accounting and other business and corporate departments in preparing our financial records. Our financial records must provide full, fair, accurate, and understandable disclosure. Employees and other providers who contribute in any way in preparing or verifying these reports should strive to ensure that our financial records are complete, accurate, and transparent. Any



employee or other provider who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor or to the Compliance Team via the methods described in Section 4.

### **c. Antitrust**

Antitrust laws are designed to protect the competitive process and impose severe penalties for certain types of violations, including criminal penalties. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. When representing Chainalysis in the community, you are expected to compete energetically by promoting Chainalysis on the merits, not by disparaging competitors. Product or service comparisons should be fair and accurate. Please also keep in mind that outside the U.S. there are further constraints under comparative advertising regulations.

Competitive information must be gathered with care. We must conduct all interactions with competitors, including social activities, as if they were completely in the public view, because they may later be subject to examination and unfavorable interpretation. Certain kinds of information, such as our strategies, business plans, budgets, forecasts, financial and operating information, pricing, production, and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be.

If you have any doubt about the legality or impropriety of a situation, please reach out to the Compliance Team via the methods described in Section 4.

## **3.3 International, Regulatory, and Government**

### **a. International Business Laws and Norms**

Providers are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where otherwise do business, including laws prohibiting bribery, and/or corruption or governing the conduct of business with specified individuals, companies, or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance.

Many countries and cultures also have unique customs, norms, and traditions including with respect to business transactions. Providers are encouraged to become familiar with the customs, norms, and traditions of the countries that they do business with.

For more information, please consult the [Anti-Bribery and Anti-Corruption Policy](#) and the [Travel Policy](#), or contact the applicable members of the Legal Team via the methods described in Section 4.

## **b. Anti-Money Laundering**

Providers are prohibited from engaging in any activity that facilitates money laundering or the funding of terrorist or criminal activities in connection with our business. Money laundering is the act of concealing or disguising the existence, illegal origins, and/or illegal application of criminally derived income so that such income appears to have legitimate origins or constitute legitimate assets. While money laundering involves giving “dirty” money, terrorist, or criminal financing often involves using legally earned income to finance illegal activities through means that appear legitimate. Chainalysis expects all providers to comply with all applicable anti-money laundering laws and regulations.

## **c. Anti-Bribery and Anti-Corruption: Gifts and Entertainment**

Providers must always use good judgment and moderation when offering or receiving business gifts, meals, entertainment, or travel. While there may be times when it is appropriate to provide reasonable business courtesies in the context of a business relationship, we must avoid potential conflicts of interest and the appearance of impropriety.

Chainalysis prohibits bribery of any kind and requires full compliance with all anti-bribery and anti-corruption laws that apply in the United States and/or internationally. Violation of these laws can lead to civil and/or criminal prosecution of Chainalysis and/or the individuals involved.

All providers are prohibited from offering, promising, authorizing, or receiving an improper payment or anything of value to or from (as applicable) any person, entity, government official, or third party to obtain or retain business or a business advantage; and must comply fully with all applicable U.S. local, state, federal, and/or national and international anti-bribery and anti-corruption laws.

For questions, please consult the [Anti-Bribery and Anti-Corruption Policy](#) and the [Quick Reference Guide: Gifts and Government Employees in the United States](#), or contact the applicable members of the Legal Team via the methods described in Section 4.

## **d. Trade Restrictions**

Chainalysis has a global reach, and the privilege of doing business globally also comes with export control obligations. Some of the strictest export controls are maintained by the United States against countries that the U.S. government considers unfriendly, adverse to U.S. foreign policy interests, or to be supporting international terrorism. These controls include the trade and economic sanctions administered by the Office of Foreign Assets Control (“**OFAC**”). The U.S. regulations are complex and apply to certain transfers of goods and technology to foreign companies and foreign persons, whether in the United States or abroad. Thus, even an oral presentation containing technical

information made to foreign nationals in the United States or access by foreign nationals to certain technology may constitute a deemed export. Chainalysis is currently prohibited from exporting its products and services to certain countries, as addressed in the Chainalysis [Customer Vetting Policy and Process](#). The consequences for not complying with the export control and economic sanctions laws could be severe for Chainalysis and the individuals involved, with administrative, criminal, and reputational repercussions. If you have any questions regarding the potential export of any products or services, please reach out to the Compliance Team via the methods described in Section 4.

## **e. Customer Vetting**

Chainalysis is committed to working with customers spanning many jurisdictions, sectors, and industries. Working with a diverse customer base offers many benefits, it also means we have a responsibility to make sure we are minimizing risk and that our customer engagements reflect our mission of building trust in the cryptocurrency ecosystem.

All prospective and current customers are evaluated pursuant to the [Customer Vetting Policy and Process](#) must go through appropriate evaluations with the vetting committee to ensure we mitigate potential risk of U.S. and international sanctions violations (ranging from significant fines to criminal penalties), reputational damage, and/or fractured customer relationships.

For further information on customer vetting, including contact information if you have any questions, please refer to the [Customer Vetting Policy and Process](#).

## **3.4 Corporate Responsibility**

### **a. Anti-Harassment and Discrimination**

Chainalysis prohibits harassment of any kind, including sexual harassment and harassment based on other characteristics, such as actual or perceived race, color, age, religion, creed, sex, gender, gender identity, gender expression, sexual orientation, marital status, partnership status, alienage, citizenship status, national origin, ancestry, medical condition (cancer/genetic characteristics and information), pregnancy, physical or mental disability, military or veteran status, request for family care leave, or any other category protected by applicable law.

Chainalysis takes allegations of discrimination, intimidation, and harassment very seriously and will promptly conduct an investigation and take appropriate corrective action when warranted, which may include disciplinary action, up to and including termination of employment or contract. For details regarding Chainalysis's policy regarding harassment and discrimination, please refer to the [Employee Handbook](#) for your region. You can also contact us via the methods described in Section 4.

## **b. Commitment to Human Rights**

Chainalysis strives to comply with all applicable laws and respect internationally recognized human rights where we operate, and expects the same of our partners. All labor must be voluntary. We don't engage in child labor, forced, bonded, or indentured labor, involuntary prison labor, slavery, trafficking of persons, or physical punishment. We pay applicable legal wages under humane conditions. We comply with all applicable environmental laws and regulations.

## **c. Commitment to Sustainability**

Chainalysis is committed to promoting environmentally conscious behaviors in our day-to-day interactions and to taking steps to minimize our impact on the environment. We strive to create a healthier and more sustainable future by supporting the development of innovative solutions that address environmental challenges both at Chainalysis and with our customers.

## **d. Use of Company Property**

Company assets should only be used for the legitimate business purposes allowed by Chainalysis. All employees and other providers have an obligation to use Chainalysis property efficiently and to report any theft or damage to Chainalysis property to appropriate Chainalysis management personnel. This includes both electronic and non-electronic equipment, and/or systems.

Further information on baseline requirements for electronic equipment can be found in [IT Security Best Practices for User Devices Policy](#) and other security [policies](#).

For employees, further information on expected use of company property can be found in the applicable regional [Employee Handbook](#) and in your Confidential Information, At-Will Employment, Arbitration and Invention Assignment Agreement or employment agreement.

# **Section 4: Code Questions and Reporting**

## **4.1 Questions**

Every provider has the responsibility to ask questions, seek guidance, and express concerns regarding this Code. If you have any questions about this Code, please contact the Compliance Team via one of the methods described in Section 4.5.

## 4.2 Reporting Obligation

Chainalysis is a workplace where employees and third parties can express concerns about its business practices and are protected from unlawful retaliation or discrimination if they properly report illegal or unethical conduct.

If you become aware of any circumstances that are—or that you suspect are—inconsistent with or in violation of this Code, any other Chainalysis policy, or applicable law, it is your right and responsibility to report such information to the appropriate Chainalysis personnel via one of the methods described in Section 4.5. If you are unsure, you can also contact the Compliance Team to answer any questions and advise of any next steps.

Because our ability to investigate depends on the quality and specificity of the information provided, when reporting a suspected inconsistency or violation, we encourage you to provide as much detail as possible about the complaint or concern, including names, a description of the alleged conduct, the dates of the alleged conduct, and the policy or law that you suspect was violated. To the extent possible, all complaints and concerns will be kept confidential.

## 4.3 Commitment to Non-Retaliation

No retaliation will be taken against you for reporting irregularities with, voicing concerns under, or suspected violations of this Code, any other Chainalysis policy, or applicable law that you believe in good faith to be true, or for participating in an investigation. Examples of retaliation can include harassment, intimidation, threats, coercion, discrimination, or negative performance feedback that is not reflective of actual performance. Any provider who feels that he or she has been subjected to retaliation should immediately report such behavior to his or her manager or primary Chainalysis contact, unless the conduct at issue concerns that manager or primary Chainalysis contact. In that case, the provider should speak to their HR Business Partner or the People Team at [hrbp@chainalysis.com](mailto:hrbp@chainalysis.com), or reach out to the appropriate personnel via one of the methods described in Section 4.5. All reports will be investigated and anyone who is found to have engaged in retaliatory behavior may be subject to disciplinary action, up to and including termination of employment or contract.

## 4.4 False and Misleading Reports

Employees who knowingly file misleading or false reports, or without a reasonable belief as to their truth or accuracy, will not be protected by this Code and may be subject to disciplinary action, including potential termination of employment or contract, subject to applicable law.

## 4.5 Contact Methods

Please use one of the methods below to ask questions regarding, or report suspected inconsistencies with or violations of, this Code, any other Chainalysis policy, or applicable law:

- **Compliance Reporting Portal:** The centralized reporting portal can be found via the Legal Intake Service Desk under “[Compliance](#).” The intake will provide you with options to submit a question about, or report any suspected noncompliance with, the Code, another policy, or applicable law. For information on how to use the Compliance Reporting hub, please see the [Compliance Hub User Guide](#).
- **Email:** Alternatively, you may contact the appropriate Chainalysis groups by email:
  - **Code:** Please contact the Compliance Team at [compliance@chainalysis.com](mailto:compliance@chainalysis.com)
  - **Other Chainalysis policies:** Please contact (a) the appropriate team listed in such policy or (b) if no team is listed, the Compliance Team at [compliance@chainalysis.com](mailto:compliance@chainalysis.com)
  - **Applicable law:** Please contact the Legal Team at [legal@chainalysis.com](mailto:legal@chainalysis.com)
- **Oral Reports:** You may also report suspected inconsistencies with or violations of, this Code, any other Chainalysis policy, or applicable law to your manager or to a member of the Legal Team. Managers must promptly report any such complaints or observations of inconsistencies or violations using one of the methods described above or to a member of the Legal Team.

The person receiving an oral complaint should encourage the individual making the complaint to prepare a written complaint or, if he or she refuses, the person receiving the complaint should prepare a written complaint based on the oral reporting.

**For General Questions:** In addition to the above, you can submit questions regarding this Code or any other Chainalysis policy, you can submit questions to the Compliance Team via Slack at [#help-compliance](#). If the question is sensitive in nature or if you prefer for it to remain confidential, please use one of the other methods identified above.

While it is Chainalysis’s desire to address matters internally, nothing in this Code should discourage you from reporting any illegal activity, including any violation of the securities laws, antitrust laws or any other federal, state or foreign law, rule or regulation, to the appropriate regulatory authority. This Code should not be construed to prohibit you from testifying, participating, or otherwise assisting in any state or federal administrative, judicial, or legislative proceeding or investigation.

## 4.6 Inquiries and Investigations

Chainalysis takes seriously all properly reported suspected inconsistencies with, or violations of, this Code, any other Chainalysis policy, and applicable law. Chainalysis will review all such reports promptly and determine whether it is necessary to conduct an informal inquiry or formal investigation and, if so, initiate such inquiry or investigation. Chainalysis will determine the appropriate scope and nature of all investigations, but will endeavor to keep the reporter informed where possible and appropriate. Chainalysis will also endeavor to avoid any actual or potential conflicts of interest when conducting such inquiries or investigations, including by restricting persons from taking part in any investigation regarding a grievance in which they are named as an alleged wrongdoer or witness. The results of any such inquiries and investigations, together with a recommendation as to disposition of the matter, shall be reported to the Chief Legal Officer for action.

Results and any reports will be treated as confidential to the largest extent possible, however, that may not always be feasible based on the nature of the allegation and/or Chainalysis's reporting and compliance obligations.

All providers are required to cooperate in such investigations. If the result of the investigation indicates corrective action is required, Chainalysis will decide what steps it should take, including, when appropriate, legal proceedings to rectify the problem and avoid the likelihood of its recurrence. Where required, violations of law will be brought to the attention of the appropriate law enforcement authorities and/or disclosed to any impacted third parties.

Executive Officers and Board Members: For reports relating to alleged conduct of an executive officer or member of the Board, the Chief Legal Officer shall determine whether to report the alleged conduct and/or the results of any such inquiry or investigation to the Chief Executive Officer and/or Board or its delegate(s).

Accounting Matters: All alleged violations regarding matters involving accounting, internal accounting controls, and financial audits shall be reported to the Board or its delegate(s) by the Chief Legal Officer.

## Section 5: General

### 5.1 Consequences of Non-Compliance with this Code

Depending on the nature of the violation, the action may result in disciplinary action, up to and including termination of employment with or service to Chainalysis. As noted herein, certain conduct in violation of this Code may also violate the law and involve civil and/or criminal penalties, and may require Chainalysis to refer the matter to the appropriate governmental or regulatory authorities for

investigation or prosecution. Moreover, any manager who directs or approves of any conduct in violation of this Code, or who has knowledge of such conduct and does not immediately report it, also will be subject to disciplinary action, up to and including termination of employment or contract.

## **5.2 Waivers**

Any waiver of any provision of this Code by executive officers or members of the Board must be approved in writing by the Board or its delegate(s), and any waiver by other providers must be approved in writing by the Chief Legal Officer.

## **5.3 Annual Training and Acknowledgement**

All providers must review and acknowledge that you have received, read, understand, and agree to comply with this Code on an annual basis, or more often if otherwise directed by Chainalysis. This acknowledgement will generally occur as part of mandatory annual training provided related to this Code.

## **5.4 Dissemination and Amendment**

Chainalysis reserves the right to amend, alter or terminate this Code at any time for any reason, subject to written approval by the Board or its delegate(s). The most current version of this Code can be found on [Confluence](#).

This document is not an employment contract between Chainalysis and any of its employees, officers or directors and does not alter Chainalysis's at-will employment policy in jurisdictions where such policy applies.