RAMPEDUP, LLC · GOVERNANCE

Business Ethics & Code of Conduct

VERSION	EFFECTIVE	OWNER	REVIEW
1.0	September 30, 2026	CEO / Data Protection Lead	Annual

RampedUp is in the business of trusted data. Customers, regulators and the people whose information we hold rely on us to act with integrity — and our own view is that a data company should be willing to show its work. This Code sets the standards every RampedUp colleague is expected to meet, whether employee, officer, contractor or director.

1 Who this applies to

This Code applies to everyone acting for RampedUp: employees, officers, directors, contractors and temporary staff. Compliance is a condition of working with RampedUp and is a factor in performance review. Where a local law sets a higher standard than this Code, the law governs; where this Code sets a higher standard than local practice, this Code governs.

2 Act with integrity

We are honest in what we say and accurate in what we publish. We do not misrepresent our data, our coverage, our certifications or our capabilities to customers, partners or the public. When we publish a number — a record count, a match rate, a coverage figure — it is one we can stand behind, and we are transparent about its limits rather than inflating it.

3 Comply with the law

RampedUp operates globally and complies with the laws that apply to its business, including the data protection and privacy regimes at the core of what we do:

- The EU and UK GDPR, and the EU–U.S., UK, and Swiss–U.S. Data Privacy Frameworks under which RampedUp is certified.
- U.S. state privacy laws, including the CCPA/CPRA and comparable state statutes.
- Data broker registration requirements in every state that has them, kept current and verifiable.
- Anti-bribery, anti-corruption, sanctions, competition and anti-money-laundering laws.

No colleague may take, or ask anyone else to take, an action that breaks the law on RampedUp's behalf — not to close a deal, hit a target, or avoid a cost.

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4 Handle data responsibly

Data is the whole of our business, so how we treat it is the heart of this Code.

- **Source lawfully.** RampedUp builds its file from publicly available business information and licensed sources. We do not acquire data through deception, unauthorized access, or in breach of another party's terms, and we do not source data on minors.
- **Minimize and purpose-limit.** We collect and retain only what serves a defined business purpose, and we use customer data only for the purposes the customer has agreed to.
- **Honor people's choices.** We maintain a public opt-out and a do-not-sell process, and we act on removal and subject-access requests within the timeframes the law requires. A person's request to be removed is respected across our file, not just the copy that received it.
- **Protect what we hold.** RampedUp data is encrypted in transit and at rest, access is role-based and least-privilege, and every colleague follows the Information Security, Acceptable Use and Password policies. Report any suspected incident immediately under the Incident Response Plan.

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5 Use AI responsibly

RampedUp uses artificial intelligence to draw business insight from publicly available sources. We do not expose customer data to our AI systems and we do not train models on customer data. AI use is scoped to defined business purposes, documented, and audited to confirm it stays within those bounds. The full commitments are set out in RampedUp's Responsible AI Policy.

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6 Avoid conflicts of interest

We make decisions in RampedUp's interest, not our own. Disclose any outside interest that could influence — or appear to influence — your judgment: a financial stake in a customer, partner or competitor; a side arrangement with a vendor you help select; or a role that competes with RampedUp. Disclosure resolves most conflicts; concealment turns a manageable situation into a violation.

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7 No bribery, no improper advantage

RampedUp does not offer, give, solicit or accept bribes, kickbacks or improper payments, directly or through third parties, anywhere we operate. Modest, customary business courtesies are acceptable; anything that could reasonably look like an attempt to buy a decision is not. We also expect the suppliers and partners in our chain to operate free of forced labor and human trafficking, consistent with our Compliance Brief on bribery, corruption and modern slavery.

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8 Deal fairly

We compete on the merits of our data and our service. We do not disparage competitors with claims we cannot support, misappropriate their confidential information, or make agreements that unlawfully restrain competition. Our comparison materials describe what others do well as well as where we differ.

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9 Protect confidential information

Colleagues protect RampedUp's confidential information — and the confidential information customers and partners entrust to us — during and after their time with

RampedUp. Use it only for the work it was shared for, and never for personal gain or the benefit of a third party.

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10 Treat people with respect

RampedUp is an equal-opportunity workplace. We do not tolerate discrimination or harassment on the basis of any characteristic protected by law, and we expect a professional, safe and respectful environment for everyone. Employment matters are governed in detail by the RampedUp Employee Handbook; this Code states the principle.

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11 Speak up — and no retaliation

If something looks wrong, raise it. Report a known or suspected violation of this Code, of the law, or of RampedUp policy to your manager or to legal@rampedup.io. Reports are taken seriously and handled as confidentially as the circumstances allow. **RampedUp does not retaliate** against anyone who raises a concern in good faith or takes part in an investigation — and retaliation is itself a violation of this Code.

> **How to raise a concern.** Talk to your manager, or email legal@rampedup.io. If a matter concerns senior leadership or you prefer not to use your manager, contact the Data Protection Lead directly. Good-faith reports are protected from retaliation.

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12 Accountability

Violations of this Code can lead to disciplinary action up to and including termination, and, where the law is broken, referral to the authorities. This Code is not a contract of employment and does not change the at-will nature of employment where that applies. RampedUp reviews the Code at least annually and may update it; the current version is the one that governs.

© 2026 RampedUp, LLC · P.O. Box 88129, Atlanta, GA 30356 · Adopted September 30, 2026. Related policies: Responsible AI Policy · Information Security Policy · Acceptable Use Policy · Compliance Brief on Bribery, Corruption & Modern Slavery · Privacy Center.