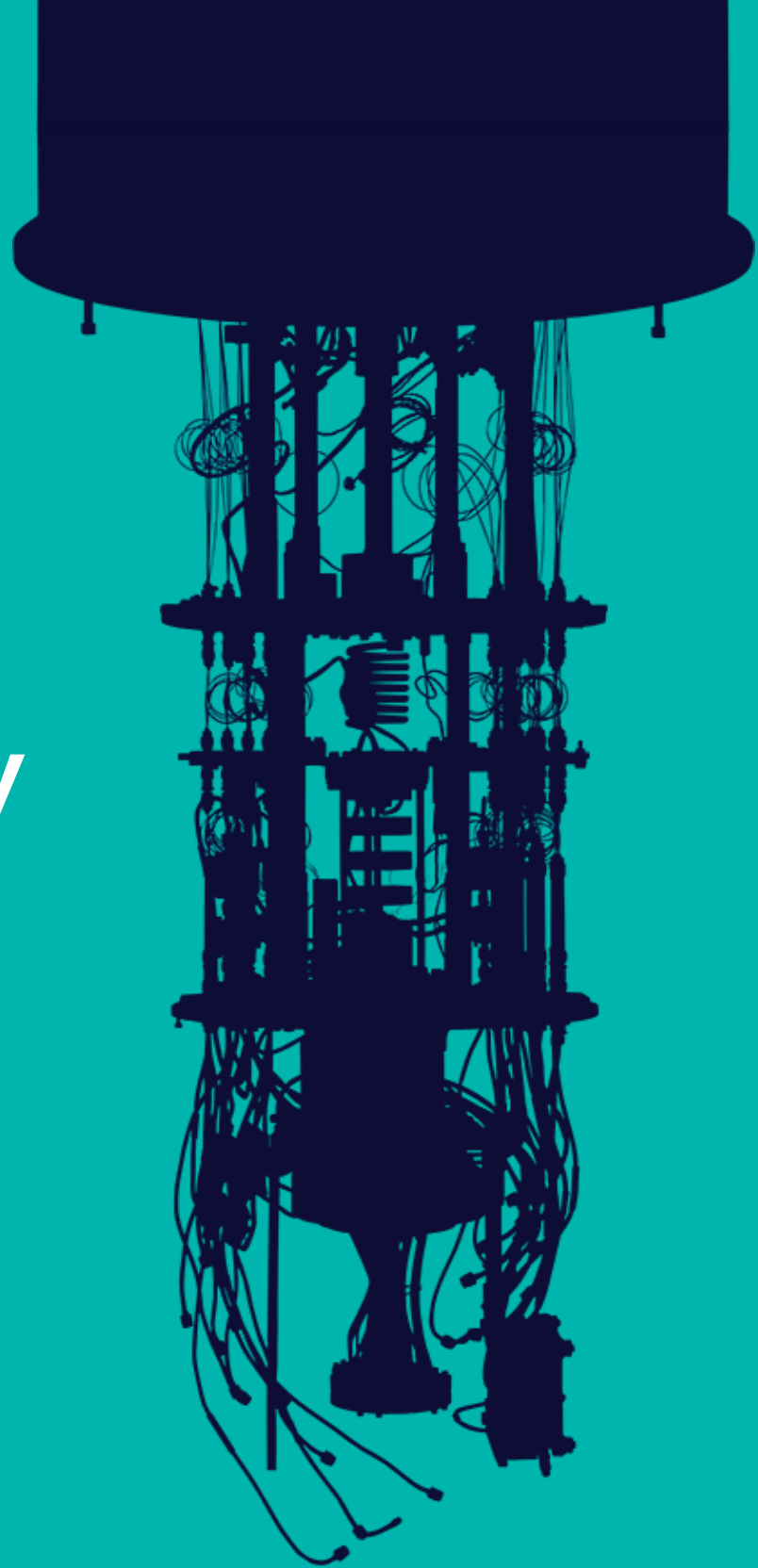


rigetti

# Third Party Code of Conduct

2023

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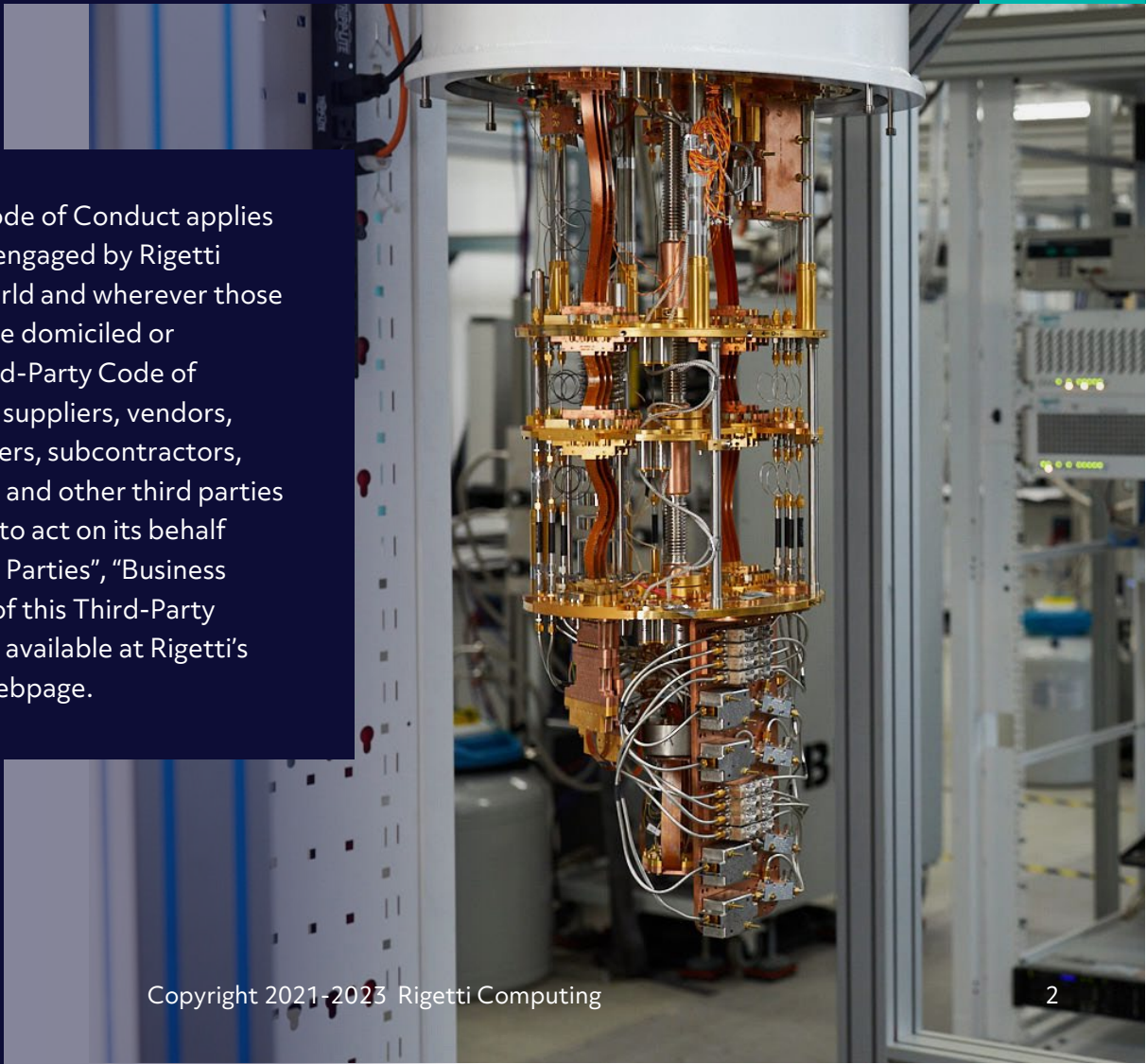


# Third Party Code of Conduct

At Rigetti we are committed to conducting our business in accordance with the highest ethical standards and in full compliance with applicable laws and regulations in the United States and in other jurisdictions in which we operate.

**As part of our commitment, we expect companies and individuals with whom we do business to do the same.**

This Third-Party Code of Conduct applies to all Third Parties engaged by Rigetti anywhere in the world and wherever those Third Parties may be domiciled or operating. The Third-Party Code of Conduct applies to suppliers, vendors, distributors, re-sellers, subcontractors, agents, consultants and other third parties engaged by Rigetti to act on its behalf (collectively, "Third Parties", "Business Partners"). A copy of this Third-Party Code of Conduct is available at Rigetti's [www.rigetti.com](http://www.rigetti.com) webpage.

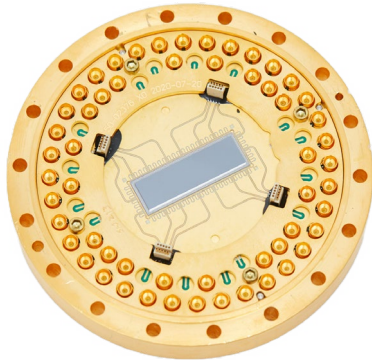


## Standards and Expectations

### Anti-Corruption

We have a zero-tolerance policy for corruption. All Rigetti Business Partners must:

- Comply with applicable U.S. and international anti-corruption laws, including the United States Foreign Corrupt Practices Act, the U.K. Bribery Act, and all other applicable laws that prohibit corruption, extortion, kickbacks, or bribery.
- Never pay bribes or provide other improper benefits to any person (whether or not a government official) to obtain and retain business or secure a business advantage.
- Never promise, offer, or authorize payment of money or anything else of value to a government official, including employees of government-owned or government-controlled entities (including non-governmental agencies and officials, such as a United Nations agency) in order to obtain or retain business, or induce the government official to do or not do something in violation of the official's lawful duties, or secure a business advantage.
- Maintain books and records that accurately reflect the true nature of transactions.



### Anti-Money Laundering

We expect our Business Partners to comply with applicable U.S. and international laws and regulations pertaining to the detection, prevention, and reporting of potential money laundering and terrorist financing activities.

### Data Privacy and Security

We expect our Business Partners to comply with U.S. federal and state (California Consumer Protection Act), the General Data Protection Regulation, the UK's Data Privacy Act and other international privacy and data protection laws and regulations, including laws and regulations regarding the cross-border transfer of personal information and to maintain appropriate procedures, safeguards and controls to secure and protect the confidentiality and integrity of all personal information received from, or processed on behalf of, Rigetti.

### Communication

Business Partners should only speak on behalf of Rigetti if expressly authorized in writing to do so by the Company's communications representative. Business Partners will not issue press releases or other publicity related to their relationship or agreements with Rigetti without the prior written consent of the Company official representative.

### Economic Sanctions, Anti-Boycott, Export Controls

We expect our Business Partners to comply with all applicable U.S. and international economic sanction laws and regulations. This means to:

- Never conduct business on Rigetti's behalf with individuals, entities, organizations or countries that are the targets of U.S. economic sanctions laws and regulations or other applicable economic sanctions laws and regulations.
- Never participate in any boycott or restrictive trade practice, unless sanctioned by the U.S. Government.
- Comply with all applicable U.S. and international export control, re-export and import restrictions.



### Confidential Information and Insider Trading

Rigetti expects its Business Partners to keep confidential all proprietary and sensitive information received from Rigetti, or disclosed to it by Rigetti, and to take precautions to safeguard such information that are at least as stringent as those that it uses to protect its own information of a similar nature. We also expect that our Business Partners will never transact in Rigetti securities while in possession of material, non-public information relating to Rigetti.

### Conflict Minerals

We expect our Business Partners to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

### Conflicts of Interest

We expect our Business Partners to avoid actual or potential conflicts between their personal interests (and those of their employees) and the interests of Rigetti. We expect our Business Partners to report to Rigetti (@ legal@rigetti.com), any situations of potential or apparent conflicts between their personal interests and the interests of Rigetti.

### Financial Responsibility and Accurate Records

We expect our Business Partners to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, and submissions to Rigetti, the customer or regulatory authorities.

### Labor, Human Rights, and Social Responsibility

We expect Business Partners to:

- Be guided by fundamental principles of human rights as set in the United Nations Universal Declaration of Human Rights.
- Ensure that all work is completed voluntarily and without slavery, servitude, forced or compulsory labor, and human trafficking and no child labor is employed.
- Create and promote a workplace free from discrimination, harassment, victimization, or any other form of inappropriate behavior or abuse on any grounds.

### Code of Conduct and Sub-Tier Suppliers

Commensurate with the size and nature of their business, we expect our Business Partners to have processes in place to support compliance with laws, regulations, and expectations related to or addressed expressly within the Third Party Code of Conduct. We encourage our Business Partners to implement their own written code of conduct, and to flow down the principles of a code of conduct to the entities that furnish goods and services to the partner.



### Reporting and Anti-Retaliation

We expect our Business Partners to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Any violations of this Third-Party Code of Conduct can be reported to us via the compliance Hotline at 833-254-2357 (toll free), secure [rigetti.ethicspoint.com](https://rigetti.ethicspoint.com) web form or via regular mail send to the c/o Rigetti Computing, Inc., 775 Heinz Avenue, Berkeley, CA 94710, Attn: Compliance Officer.

Procedures for submitting fraud, waste, abuse, and whistleblower complaints are generally accessible on agency Office of Inspector General (OIG) [websites](#). Complaints related to Department of Defense (DOD) contracts can be filed online via [the DOD IG Hotline website](#). Complaints related to the Department of Energy (DOE) contracts can be filed via [the DOE OIG Hotline website](#).

### Inquiries and Updates

Please feel free to contact Rigetti with your comments/questions about the Code at [legal@rigetti.com](mailto:legal@rigetti.com). Rigetti may update this Third-Party Code of Conduct from time to time.