

Airship Code of Conduct

At Airship, we focus on providing the best possible software and services, being a joy to do business with, and helping our customers implement great ideas.

We succeed when we help our customers provide delightful experiences for their users.

We're here to make a lasting impact, build world-class systems, and create a community that benefits those around us. We do this by following the law, acting honorably and ethically, and treating each other with respect.

This Code applies to every employee of Airship. Each of us has a personal responsibility to incorporate the Code in our work and encourage other Airshippers to do the same.

HOW WE DO BUSINESS

Integrity

The success of Airship depends on the trust and confidence we earn from our customers and partners. We earn that trust by acting ethically and with integrity.

Excellence

We don't settle for anything less than excellence. We achieve together, helping one another, never simply "going through the motions." We are proud to work with smart colleagues and partners, and we relish a challenge.

Take Action

Continually improving our products and services is a team effort. Any time you feel our customers aren't being served to the best of our abilities, speak up.

Transparency

We communicate in a transparent fashion internally and externally to improve Airship for our customers and employees.

WORKPLACE THAT SUPPORTS OUR BEST WORK

Equal Employment Opportunity

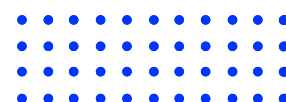
Employment at Airship is based upon individual performance, qualifications and merit related to professional competence. We prohibit unlawful discrimination, bias or harassment on the basis of race, religion, national origin, color, sex, gender, sexual orientation, gender identity or expression, age, veteran status, pregnancy status, mental or physical disability, medical condition or any other characteristic protected by law. We also make reasonable accommodations to meet our obligations under the laws protecting the rights of the disabled.

Respectful Workplace

We treat each other with dignity and respect. This includes little things, such as including coworkers at a lunch table and introducing yourself to new hires. It also means big things, such as being honest, doing the right thing, thinking deeply about what's in this Code, and living its example.

Inclusive Workplace

We deliberately foster an inclusive workplace. We love that we're all unique; we encourage diversity of thought, experience, and background. We also do not tolerate harassment in any form, period. That means no hazing, bullying, intentional slights or misnaming, demeaning words or actions, inappropriate jokes, or anything that threatens the



emotional well-being of another. While we realize that well-intentioned mistakes happen, we will act swiftly, directly and appropriately to all reports of harassment.

Safe Workplace

We are committed to a violence-free work environment and we do not tolerate any level of violence or the threat of violence in the workplace. Firearms, explosives or similar weapons are not allowed on any Airship premises.

Learning From Our Mistakes & Each Other

We are committed to learning and sharing our knowledge. We make mistakes, but we also learn from them. In case of honest errors that violate the Code, we will give the benefit of the doubt, but we also recognize that this is not an unlimited resource. We improve ourselves and our interactions by learning from each other and the wider community.

Listening & Participating

We speak freely and listen carefully. We respectfully engage in constructive conversations with dissident and diverse opinions, listening to each others' concerns and taking them seriously. We readily share ideas and solutions.

Personal & Team Accountability

We hold ourselves and each other accountable. Because we take ownership of our contributions to team goals, we can enjoy autonomy and flexibility in our work. We also promote teamwork, supporting each other and aiming for the success of all. This means that if we feel something isn't right, we speak up and strive to make it right. Retaliation is always unacceptable and need not be feared.

AVOID CONFLICTS OF INTEREST

As employees of Airship, we have an obligation to act in the best interest of Airship. This means that all of us should avoid situations where our actual or apparent private interest interferes in any way with the legitimate interest of Airship. Conflicts of interest may also arise when you (or your family members) receive an improper personal benefit as a result of your position in Airship. The Airship Employee Handbook includes more detailed

descriptions and examples of the following areas where conflicts of interests often arise: (i) personal investments; (ii) outside employment, advisory roles, board seats, and starting your own business; (iii) business opportunities found through your Airship work; (iv) inventions; (v) friends and relatives; (vi) co-worker relationships; and (vii) accepting or offering gifts, entertainment and other business courtesies, other than those of minor value. If you are in a situation that may create a conflict of interest, discuss that situation with your manager or People Ops before any further engagement.

PROTECT AIRSHIP'S ASSETS & CUSTOMER DATA

Preserve Confidentiality

As part of your work at Airship, you are entrusted with confidential information of Airship. Disclosing Airship confidential information to anyone outside of the company is not allowed, other than on a "need to know" basis with proper authorization and only under a non-disclosure agreement. Some of us are also entrusted with confidential information of our customers, partners, vendors or other third parties. Your use and protection of such third party confidential information should at all time comply with the terms of the non-disclosure agreement in place with such party. You should assume that customer information and Airship information is confidential unless you have clear indication that such information has been publically released. Also, don't forget that you signed a confidentiality agreement with Airship when you became an employee, and those terms apply to any confidential information you have access to as part of your work at Airship. If you have any questions about these agreements please consult Legal.

Maintaining Security & Privacy

The integrity and security of Airship's and our customers' information, data and assets are of critical importance to our business. We process, collect, store and transmit data on behalf of our customers, and maintaining appropriate security and privacy is the responsibility of each of us. Be sure to follow all Airship security and privacy policies. If you have any reason to believe that



security or privacy has been violated (for example, you lose your laptop or smartphone or think that your password may have been compromised), promptly report the incident to your manager.

Intellectual Property

As a technology company, our intellectual property rights are among our most valuable assets. Unauthorized use can lead to loss of such right or substantial reduction in value. Report any suspected misuse of Airship intellectual property to your manager or Legal.

Use of Airship Equipment & Facilities

Airship also respects the intellectual property rights of third parties. You must not infringe, misappropriate or otherwise misuse intellectual property belonging to a third party in connection with the performance of your duties for Airship, and no property of a third party may be incorporated into the technology or products of Airship without appropriate executive authorization.

Airship hires people that do great work. To support that work, Airship provides you with equipment, facilities and systems, and counts on us to be responsible with our use. The Handbook includes policies regarding this. Remember that Airship, in operating its business responsibly, retains the right to monitor, intercept or inspect information that passes through its infrastructure.

FINANCIAL INTEGRITY & RESPONSIBILITY

Financial Responsibility

Each of us has responsibility to make sure that Airship money is appropriately spent, our financial records are complete and accurate, and internal controls are honored.

Financial Records

Each of us is accountable for the accuracy of the business records we handle in the normal course of business. We are each responsible for following Airship's established accounting guidance and processes. You should never interfere with or improperly influence the auditing of Airship's books and records. Similarly, you should never falsify any

record or account, expense accounts or any other Airship records. If you notice an inaccuracy in a company record, or a failure to follow our internal control processes, report to your manager or People Ops.

Signing a Contract

Only employees with the authority to sign contracts on behalf of Airship may sign. If you are unsure whether you are authorized, ask your manager or Legal. All contracts at Airship should be in writing and should contain all of the relevant terms to which the parties are agreeing.

UPHOLD THE LAW

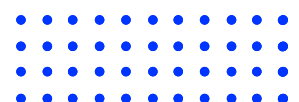
Airship's commitment to integrity begins with complying with laws, rules and regulations where we conduct business. Further, each of us must have an understanding of company policies, laws, rules and regulations that apply to our specific roles. If you are unsure of whether a contemplated action is permitted by law or Airship policy, consult Legal or People Ops. Each of us is responsible for preventing violations of law and for speaking up if we see possible violations.

Antitrust & Competition Laws

Airship is committed to outperforming our competitors in a legal and ethical way. When dealing with competitors, you should never enter into any agreement, written or verbal, to set prices or other terms of sale, coordinate bids, allocate customers, sales territories or product lines, or engage in any other activity that violates applicable anti-trust or competition laws. Violations of antitrust or competition laws are complex and vary by country. If you have any questions or suspect anyone at the company is violating these laws, contact Legal or People Ops.

Trade Controls

Trade laws control where Airship can send or receive our products and services. Airship is committed to conducting its business in full compliance with all applicable trade laws.



Insider Trading

As part of your work for Airship, you may learn certain material non-public, or “inside”, information about Airship or another company. To use this material non-public information to buy or sell stock, or to pass it along to others so that they may do so, could constitute “insider trading.” Any “insider trading” violates this Code and violates the law.

Anti-Corruption & Anti-Bribery

Corrupt arrangements with customers, suppliers, government officials or other third parties are strictly prohibited. Corruption includes bribery (bribery of a government official or commercial bribery), extortion or kickbacks of any kind. Corrupt activities are not only a violation of this Code, they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws in various countries, including the U.S. Foreign Corrupt Practices Act. The rule at Airship is simple – don’t bribe anybody, anytime, for any reason.

Community & Environment

We strive to make a positive contribution to society and the environment by: paying fair and equitable wages; prohibiting forced or child labor; maintaining and promoting fundamental human rights; respecting the environment; supporting community organization; and supporting employee development.

Further Questions or Concerns?

The principles included in this Code are further detailed in the Airship Employee Handbook. Violations of this Code and the related policies included in the Handbook can result in disciplinary action, including termination of employment. If you have a question or concern, contact your manager, People Ops or an executive of Airship.

No Retaliation

Any retaliation against an employee who reports or participates in an investigation of a possible violation of this Code and the related policy included in the Handbook is strictly prohibited. If you believe you are being retaliated against please contact People Ops.

