ANTHROP\C

Global Code of Conduct

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Introduction

At Anthropic (referred to herein as "we", "us", "our", "Anthropic", or the "Company"), one of our core beliefs is that humanity is on the precipice of the most important technological innovation in history. Our mission to responsibly develop and maintain advanced AI for the long-term benefit of humanity is not just ambitious—it's crucial for the future of humanity. With this great opportunity comes an equally great responsibility to operate with the highest ethical standards.

This Global Code of Conduct (the "Code") is our compass, guiding us to make decisions that are ethically sound. It reflects our commitment to integrity, safety, and the global good. All of us, at every level of our organization, are expected to understand and adhere to this Code. By following this Code, we protect our Company, our stakeholders, and ultimately, the world we aim to positively impact through our work.

You play a crucial role in upholding our ethical standards:

- Embody Anthropic's mission, values, and ethical principles.
- Apply ethical considerations to your decision-making processes, regardless of your role.
- Speak up if you observe conduct that doesn't align with our ethical standards.
- Seek guidance when faced with ethical dilemmas or unclear situations.
- Participate actively in integrity and compliance training programs.
- Support your colleagues in making ethical decisions.

Scope

While this code of conduct is specifically written for all Anthropic employees, officers and directors ("Ants") globally, we expect members of our extended workforce (including, but not limited to, consultants and contingent workers) and others who may be temporarily assigned to perform work or services for Anthropic to be apprised of and follow the Code and applicable Anthropic policies.

Seeking Guidance

Throughout this Code there will be references to different teams who own specific policies and can address additional questions. For more information, and to learn how to get in contact with them, please refer to their team homepage:

- Legal team
- Integrity & Compliance
- Security team
- Finance team
- People Partner team
- Communications team
- Trust and Safety and Responsible Scaling teams
- Policy team

To help you easily locate relevant resources, we've included a complete reference table at the end of this Code that contains links to all policies and guidance documents referenced throughout this Code.

Reporting Concerns

You have the duty to report any known or suspected violations of this Code, Company policies, laws or regulations. Managers have special obligations to report issues that they observe or that employees share with them through the appropriate escalation channels. We do not permit retaliation of any kind for good faith reports of violations or possible violations, or for participation in investigations, and we encourage you to speak up, without fear of reprisal or retaliation.

To report concerns anonymously, visit anthropic.ethicspoint.com. For more information see our Safety & Compliance Reporting and Non-Retaliation Policy.

Nothing in this Code or any Anthropic agreement prohibits you from reporting potential legal violations to appropriate authorities without notice to Anthropic or exercising your rights under applicable whistleblower laws.

Ethical Business Conduct

At Anthropic, our commitment to acting for the global good means that we are dedicated to conducting our operations with the utmost integrity, in compliance with relevant laws and regulations.

Our commitment to global good starts with you. No matter your role or where you work, you play a vital part in upholding Anthropic's integrity and ethical standards. This means conducting your work in compliance with applicable laws and regulations, and understanding the legal and policy requirements that apply to your role.

If a law, regulation, or court order applicable to you or Anthropic conflicts with a policy in this Code, you must comply with whichever policy, law, regulation, or court order is strictest. If you have any questions about these conflicts, you should immediately ask your supervisor, People Partner, or the Legal team how to handle the situation.

Responsible AI Development and Scaling

We recognize the profound impact that artificial intelligence will have on the world. As we work towards developing transformative AI systems, we are committed to doing so in a safe, responsible, and ethical manner.

AI Laws, Regulations, Voluntary Commitments, and Agreements

Anthropic keeps top of mind all relevant AI laws and regulations in the jurisdictions where we operate. Our approach goes beyond mere compliance with relevant mandatory frameworks, embracing voluntary commitments that reflect our dedication to responsible AI development.

Responsible Scaling Policy ("RSP")

We have developed and implemented the RSP, which is a cornerstone of our approach to AI development. Our RSP sets forth our risk governance framework for mitigating potential catastrophic risks from frontier AI systems.

Usage Policy

We developed and implemented our Usage Policy to help our users stay safe and ensure our products and services are being used safely and responsibly.

For more information about our Usage Policy and information about how to report feedback directly to our Trust and Safety team, please refer to the Usage Policy.

Research Investment, Transparency, and Collaboration

We believe in the importance of transparency in AI development, and dedicate significant resources to AI safety research. We regularly publish research findings and engage with the broader AI community to foster collective progress in AI safety. We also engage with academic institutions, industry partners, and policymakers on AI safety.

If you have concerns about the safety or ethical implications of any aspect of our work, voice them with your manager immediately.

Workplace Standards: Safety, Equality, and Legal Compliance

Our Commitment to Workplace Health and Safety

At Anthropic, the health, safety, and well-being of all individuals working on our behalf are paramount. We are committed to providing a safe and healthy work environment. Whether you are an employee or part of our extended workforce, you play a crucial role in maintaining this environment. Here's what we expect:

1. Familiarize yourself with and follow Anthropic health and safety policies and procedures.

2. Speak up if you have concerns or ideas about improving workplace safety in Anthropic-related activities.

3. Maintain a drug-free workplace in compliance with the U.S. Drug-Free Workplace Act and similar laws. This means you cannot manufacture, distribute, dispense, possess, or use controlled substances in the workplace or while conducting Anthropic business. This does not prohibit you from the lawful use and possession of prescribed medications.

4. Anthropic has zero tolerance for workplace violence or threats of workplace violence. If you become aware of conduct that violates this standard, please report it to our Physical Security team promptly.

Remember, safety is a shared responsibility. By prioritizing health and safety in your work with Anthropic, you contribute to a culture that values and protects every individual involved in our mission.

Our Commitment to Equality

Anthropic is committed to fostering an equitable and inclusive workplace that provides equal opportunities for everyone. This extends to all of our practices, including recruiting, hiring, placement, promotion, performance management, compensation design, termination and all other rights, privileges and terms of employment. It is also our expectation that you treat everyone you encounter at work - whether it's a fellow Ant, a contingent worker or a visitor - with respect, dignity, and professionalism, regardless of their background.

We honor our commitment to equality by complying with all applicable laws and regulations which prohibit unlawful discrimination and harassment on the basis of a legally protected category. Local laws and regulations dictate the basis of a legally protected category. For more information, you should consult the policies against discrimination and harassment in your local employee handbook.

There is zero tolerance for discrimination and harassment at Anthropic; and we will take appropriate remedial action to address violations, whether the violation is committed by an employee, officer or director of Anthropic or a third party.

Human Rights and Labor Practices

At Anthropic, respect for human rights is fundamental to our mission. We are committed to upholding internationally recognized human rights principles in all our operations and throughout our supply chain.

We adhere to the United Nations Universal Declaration of Human Rights, U.S. Federal Acquisition Regulation requirements, Fair Labor Standards Act, the U.K. Modern Slavery Act, and local labor laws in all jurisdictions where we operate.

Remember, respecting human rights is not just about compliance—it's central to our value of acting for the global good. Your active participation in upholding these principles helps ensure our work aligns with our commitment to human dignity and fair labor practices.

For additional guidance, please refer to the Anti-Human Trafficking and Modern Slavery Policy.

Legal Compliance

Privacy and Data Protection

You are expected to uphold the highest standards of data protection and privacy in compliance with applicable laws and our internal policies. This responsibility extends across all our operations, including research collaborations, partnerships and customer relationships with highly regulated industries such as healthcare, finance, and government. When handling data related to these sensitive sectors, always consult with the Legal and Security teams to ensure full compliance. Your responsibility also extends to personal data collected in respect of our employees, users and third parties.

Our commitment to privacy includes being transparent about our data practices, limiting collection to what is essential, and addressing the unique challenges posed by AI systems, such as potential indirect identification or inference of sensitive information. We implement robust safeguards to prevent unintended disclosure of personal information through AI model outputs. Remember, respecting and protecting user privacy is paramount - you should only access and use user and employee data within the confines of your job function. By adhering to these principles, we maintain trust and integrity in our data practices across all aspects of our work.

For more detailed information on privacy and data protection, please refer to our Internal Global Data Protection and Privacy Policy and HIPAA Compliance Policy or reach out to the Legal team for additional information.

Cybersecurity

Protecting Anthropic's digital assets is everyone's responsibility. This requires you to be aware of, and adhere to, Company security protocols. If you believe you may have exposed Anthropic to a cyberthreat, contact the Security team immediately. By adhering to these guidelines, we can collectively maintain a strong security posture.

For more detailed information on specific cybersecurity policies, please refer to the Security Policies here.

Insider Risk

We developed and implemented our Insider Risk Policy to help maintain safeguards against insider risks that could jeopardize our systems and intellectual property. For more detailed information on Insider Risk and information about how to report any insider risk incidents, please refer to the Insider Risk Policy.

Intellectual Property and Confidential Information

Our intellectual property ("IP"), including our confidential information, is critical for our mission to safely navigate the world through transformative AI. We are committed to protecting these assets while respecting the IP rights of others, embodying our values of global good and responsible AI development. This dual commitment requires vigilance from all Ants.

We expect you to

- maintain the confidentiality of information about the Company and other companies entrusted to you by the Company,
- use the information only for permissible business purposes and in accordance with any restrictions imposed by the disclosing party, and
- limit dissemination of the confidential information, both inside and outside the Company, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

Our Confidentiality Guidelines provide additional details on handling confidential information, including what details can be shared with external parties. Respecting IP goes both ways. We also expect employees and our extended workforce to honor their confidentiality obligations with third parties, including previous employers. This information should never be disclosed or used in your work at Anthropic.

Financial Integrity

Employees, including officers and directors, and our extended workforce are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility. This means recording, maintaining, and filing financial transactions and business records truthfully, accurately, on time, and with the appropriate detail and supporting documentation. The Company expects you to take this responsibility very seriously to help Anthropic ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that Anthropic files with government agencies or releases to the general public.

Each employee that is involved in Anthropic's disclosure process, including our principal executive officer, principal financial officer, principal accounting officer and other senior employees who perform similar functions for the Company (collectively, "Senior Financial Officers"), are responsible for the fair, accurate, complete, and timely reporting of our financial information. Senior Financial Officers must familiarize themselves with the disclosure requirements applicable to the Company and the business and financial operations of the Company, and must not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors, governmental regulators and self-regulatory organizations.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely. Every financial transaction must be accurately recorded, properly authorized, and supported by appropriate documentation in accordance with applicable legal requirements and our internal financial controls. We strictly prohibit any undisclosed or unrecorded payments, assets, funds, or accounts for any purpose. Creating false and/or misleading entries in any Company books or records is expressly prohibited. You should immediately report

any suspicious financial activities that could indicate fraud, money laundering, or other improprieties.

You can find additional detailed information on financial compliance in our Anti-Bribery Anti-Corruption Policy, Travel and Expense Policy, Procurement Policy, and Procurement Conflict of Interest Policy.

For additional guidance on financial compliance, please reach out to the Finance team or the Legal team.

Conflicts of Interest and Outside Business Activities

A conflict of interest arises when your personal, financial, or outside interests could influence, or appear to influence, your judgment when acting on Anthropic's behalf. Your decisions at Anthropic should be based on Anthropic's best interests, not personal relationships or benefits. Employees, including officers, and directors, must never use or attempt to use their position with Anthropic to obtain improper personal benefits. You must promptly disclose all actual, apparent, or potential conflicts of interest, including conflicts arising from:

- **Financial interests**. Where your personal financial interests could influence, or appear to influence, your professional judgment or decision-making at Anthropic. For example, where you, a member of your household, or a close family member or friend has a financial relationship with an Anthropic business partner, vendor, or competitor, or makes a direct investment in a company operating in areas related to Anthropic's current or anticipated business activities.
- **Non-financial interests.** Where a non-financial benefit, opportunity, or relationship could impair your objectivity or conflict with Anthropic's interests. For example, where you take advantage of a business opportunity that should belong to Anthropic, or have a personal relationship with personnel from an Anthropic vendor, partner, customer, M&A target, or competitor that could affect business objectivity.
- **Close personal relationships**. Where you have a close personal or familial relationship with someone whose compensation, evaluation, or promotion you influence, or someone working at a company we do business with.

Additionally, we support our employees' professional growth and understand you may have interests and opportunities beyond your work at Anthropic. An Outside

Business Activity ("OBA") is any external professional activity, paid or unpaid, that you engage in outside of your job duties at Anthropic using your professional skills or expertise. Examples include employment, consulting, advisory services, board roles, teaching or educational positions, or other business activities that could potentially conflict with your obligations to Anthropic. All OBAs must be disclosed and approved by the Integrity and Compliance team before you engage in the activity. Paid outside work, and any outside work for AI-related companies or Anthropic counterparties, will generally not be approved. Personal activities that are completely unrelated to your Anthropic role and Anthropic's business, do not use skills or expertise related to your position, take place entirely outside working hours, have no impact on your job performance, and do not use Anthropic resources or confidential information do not require disclosure or approval.

You can find detailed information and guidance on conflicts of interest and OBAs in our Conflicts of Interest and Outside Business Activities Policy.

Corporate Opportunities

You are prohibited from taking or directing to a third party to take, a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. Employees, including officers, and directors, are further prohibited from competing with the Company directly or indirectly during their service to the Company and as otherwise provided in any written agreement with the Company.

Insider Trading

We are committed to compliance with insider trading laws to protect the integrity of the private and public markets in which we and our partners operate.

Information is "material" if a reasonable investor would consider it important in deciding whether to buy or sell stock. Examples of material information include, but are not limited to, positive ***or*** negative financial results, significant business developments, major personnel changes, or pending acquisitions.

If you're uncertain about whether information qualifies as material nonpublic information or if a trade is permissible, always exercise caution and consult the Legal team for guidance.

Additionally, you may not engage in any trading on prediction markets or event contracts involving Anthropic-related events or outcomes, even if you believe you are not in possession of material nonpublic information.

You can find detailed information and guidance about insider trading in our Insider Trading Policy and Guidelines.

Fair Competition

Antitrust and competition laws are designed to foster free and fair competition, and compliance with these laws is mandatory. We should not make agreements—express or understood—that are designed to restrict competition. And in our day-to-day operations, it's crucial that we exercise caution in discussing government bids or procurements, pricing, markets, job candidates, customers or suppliers, strategic planning, or any other competitively sensitive information.

Our growth strategies, including mergers, acquisitions, and joint ventures undergo thorough review by the Legal team. This ensures our compliance with antitrust laws and maintains our commitment to fair competition.

For additional guidance, please refer to the policy on Fair Competition and Antitrust or consult the Legal team.

Anti-Bribery and Anti-Corruption

We prohibit bribery and corruption in all our global operations. We are committed to complying with applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the U.S. Anti-Kickback Act, and the U.K. Bribery Act.

You are expected to familiarize yourself with our policies prohibiting bribery and corruption. Here are a few important callouts:

- Never offer, give, or accept anything of value to improperly influence business decisions or gain an unfair advantage. This includes cash, gifts, entertainment, travel expenses, contract bids, or job offers.
- You should consult the Integrity & Compliance or Legal team before offering anything of value to government officials, which includes government

employees, political figures, employees of state-owned enterprises, and staff of publicly funded schools and universities.

You can find detailed information and guidance in our Anti-Bribery Anti-Corruption Policy and Travel and Expense Policy.

Trade Laws

We are committed to complying with all applicable trade laws, including U.S., EU, and UK sanctions, export controls, and import and customs laws.

You are expected to familiarize yourself with our Global Trade Policy, but here are a few important callouts:

- Do not transact with any individual, entity, or government targeted by U.S., EU, or UK sanctions; and

Do not transact with countries or regions targeted by U.S., EU, UK comprehensive sanctions (which currently comprise Cuba, Iran, North Korea, and the occupied regions of Ukraine).

Employees must consult with the Legal team before entering into any transaction with or involving sanctioned persons or comprehensively sanctioned regions. For additional guidance, please refer to our Global Trade Policy.

Political Activities

We strive to maintain a professional, non-partisan work environment. We want Ants of all political stripes to feel comfortable here.

To that end, we respect your rights to participate in political activities in your personal capacity while also avoiding a scenario where personal political activity may be mistakenly imputed to the company or otherwise negatively affect the company. Anthropic participates in the political process in a manner that complies with all applicable laws, reflects responsible corporate citizenship, and embodies the company's mission, values, and ethical principles. Government decisions significantly affect the company's work and mission, so Anthropic may engage with public decision-makers and encourage employees' civic engagement where appropriate. Any contribution made on behalf of Anthropic or using Anthropic funds or facilities must be pre-approved, in writing, by Legal.

Government Contracting Responsibility

We have a responsibility to uphold the highest standards of ethics, integrity, and compliance in all of our government contracting activities. If you are involved in any aspect of Anthropic's work related to government contracts, you have a special responsibility to comply with all applicable laws, regulations, and contractual requirements related to government contracting. This includes the U.S. Federal Acquisition Regulation ("FAR"), agency-specific supplements, and relevant statutes. You are also required to stay informed of changes to these requirements and adjust our practices accordingly.

For more detailed information on our compliance requirements as a government contractor, please reach out to the Legal team.

Communicating with Care

External Inquiries, Media Requests, and Social Media

Only certain individuals may speak on Anthropic's behalf. You should never respond on behalf of Anthropic to any inquiry from a member of the financial community, the press, or any other outside organization or individual unless authorized to do so in accordance with our Regulation FD and External Communications Policy. All media interactions must be coordinated through Communications to ensure consistent messaging.

If approached by reporters or other media representatives—whether online, in person, or at events—politely defer with "I'll connect you with our Communications team who can help" and direct them to press@anthropic.com.

When speaking publicly and using social media, be clear when an opinion is your own and not Anthropic's, and do not lead people to believe you are speaking for or on behalf of Anthropic, unless you have received permission to do so.

For more information, please refer to our Regulation FD Compliance Policy and External Communications Guidelines.

Government, Regulatory, and Legal Communications

You should never respond directly to any government, regulatory, or legal inquiry on behalf of Anthropic. If you are served with a subpoena, court order, or other legal document related to Anthropic, immediately forward it to the Legal team without responding to the sender and await the Legal team's guidance.

Vendor and Supply Chain

We conduct our business with integrity and expect our partners and vendors to uphold these same standards of ethical conduct, environmental responsibility, and regulatory compliance. As part of our commitment to responsible AI development, managing our vendor and supply chain relationships in an ethical manner is crucial.

We expect all employees to:

- Follow established Company processes for vendor selection and engagement;
- Maintain appropriate documentation of vendor activities and deliverables; and
- Report any concerns about vendor or supplier conduct through appropriate channels.

Anthropic is committed to respecting and promoting human rights throughout our value chain. We have developed a Vendor Code of Conduct that aligns with our core values. All vendors and suppliers must acknowledge and adhere to these standards as a condition of doing business with Anthropic.

For more information please reach out to the Finance, Legal, or Security teams.

Accountability and Discipline

We expect all employees, officers, directors and our extended workforce to uphold the highest standards of integrity and to be accountable for their actions.

- Violations of this Code and the policies referenced in this Code may lead to disciplinary action, up to and including termination of employment, in accordance with local legal requirements.

- Disciplinary measures will be determined based on the nature, severity, context of the violation and applicable law. We strive to apply these measures fairly and consistently across the organization.
- In some cases, violations of this Code may also violate the law, potentially resulting in civil or criminal penalties. Anthropic will cooperate fully with appropriate authorities in these situations.
- We recognize that ethical decision-making can be complex. Making an honest mistake while trying to do the right thing is different from knowingly violating or disregarding our policies or ethical standards.

For more detailed information about Accountability and Discipline please reach out to your People Partner.

Investigations

We assess each report of potential wrongdoing and, where warranted, we route it to the appropriate team to investigate. The Board or an appropriate committee thereof will oversee investigations of potential violations by directors or executive officers. However, it is imperative that the person reporting the violation not conduct an investigation on their own. Employees are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Employees should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation or matter that you reasonably believe may lead to an investigation.

In addition, employees are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

Waivers of this Code

Any amendment or waiver of any provision of this Code for an officer or director must be approved in writing by the Board or the Audit Committee, and promptly

disclosed pursuant to applicable laws and regulations or the rules of the stock exchange on which the securities of the Company are listed.

Continuous Improvement

We are committed to continuous improvement of our ethical standards and practices. We encourage you to provide feedback and suggest improvements to ensure our ethical standards remain robust and relevant.