



## nCino Code of Business Conduct and Ethics

At nCino, we Do the Right Thing.

### Introduction

At nCino, Inc. and its affiliates and subsidiaries ("nCino"), our Code of Business Conduct & Ethics (the "Code") is vital to how we conduct business. It's not just about following rules and laws; it's also about making ethical and responsible choices. The Code is full of real-world examples and tips to help us make smart decisions. Everyone at nCino, including our subsidiaries, contractors, and directors, is responsible for knowing the policies and guidelines in this Code and is expected to follow the Code.

While the Code may not have an answer for every single situation, it contains resources to help navigate daily decisions and how to best conduct business.<sup>1</sup>

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<sup>1</sup> Neither the adoption of this Code nor any descriptions of its provisions constitutes a representation that all of its personnel are at any time in full compliance. The Code does not constitute an employment contract or an assurance of continued employment.

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# President & CEO Statement

At nCino, we're all about making a positive difference with our cutting-edge technology. Our impact is big, thanks to our amazing team and the trust we've built worldwide. Keeping this trust means always being ethical and doing the right thing for our clients and each other.

Because you are a part of our team, you also play a key role in keeping nCino a place we can all be proud of. The Code of Business Conduct & Ethics is our guide to making good choices so that we can Live the Six every day.

Sean Desmond

## Our Mission & Values

nCino's mission is to transform the financial services industry through innovation, reputation, and speed. This is no easy task, yet we've been doing it since day one. During the past few years, we have scaled tremendously. While this kind of growth certainly requires strategy and planning, the real secret to our success is a strong Company culture and focused execution.

nCino's culture is a combination of our shared vision, values, beliefs, and habits. It's what current and prospective employees picture when they think of nCino, and how we feel each morning when we walk through the doors and arrive at our desks. nCino has cultivated a unique culture that allows our employees to feel supported, respected, and empowered.

As new employees join the Company, it is important that they understand, appreciate, and embrace the culture, so that we are all successful. nCino's culture begins with our six core values that guide our relationships, actions, and attitudes.

## 1. Bring Your A-Game

We always do our best and give our best so we can create our best. We hire talented individuals, provide them with resources they need to perform at the top of their game, and recognize and reward their efforts.

## 2. Do the Right Thing

We trust our employees to do the right thing for our customers, colleagues, and partners. This creates a culture of trust, a willingness to take risks when appropriate, and the ability to be agile and innovative.

## 3. Respect Each Other

We value each and every person at nCino. Their opinions matter, and their contributions to the workplace are vital. We treat all people with respect and dignity and seek ways to celebrate our differences.

## 4. Make Someone's Day

Offering a helping hand can not only brighten someone's day – it can also transform their experience at nCino. We always look for opportunities to help someone solve a problem or to simply be kind.

## 5. Have Fun

We take our work seriously, but we don't take ourselves too seriously. We know that having fun fosters creativity, encourages innovation, and promotes collaboration, which is why we work hard and play hard.

## 6. Be a Winner

When we have a winning attitude and are passionate about what we do, our customers are happy and our employees are excited to come to work every day. When nCino's culture works, everybody wins.

# Living the Code

## Speaking Up

If you have a question or notice something that doesn't seem right, let your people leader know right away—even if it seems small or insignificant. In order to solve problems, we must be alerted to them.

Everyone at nCino should feel empowered and encouraged to voice any concerns to their people leader, a member of the People Operations Team or the Executive Leadership Team. If you have a concern about safety, culture, or rules or policies that aren't being followed, here are a few ways you can feel empowered to make your voice heard.

## How to Speak Up

1. Call or visit the [Whistleblower Hotline](#).
2. Reach out to someone in People Operations.
3. Contact a member of our Legal Team.
4. Talk with your people leader.
5. Reach out to a member of the Executive Leadership Team.

## Retaliation

Our [Anti-Retaliation Policy](#) is clear. As long as you're honest and you believe in the accuracy of your report, no action will be taken against you. If, upon investigation, your concern is determined to not require action, know that you will not be retaliated against because you filed a report in good faith. Consequences only occur if you knowingly make a false report.

# Stay Honest and Do the Right Thing

## Your Role

Your job is to make good choices and follow the Code, our policies, and the law. This helps us hire great people, make industry-leading products, and support our customers.

## What We Expect from You:

- Familiarize yourself with the Code and our policies.
- Know the laws that apply to your job.
- Always be honest, whether you're working with team members or clients.
- Use your best judgment.
- If you have questions, ask for guidance.
- If you have concerns, voice them without fear of retaliation.
- Keep communication open and safe.

## Making Smart Choices

When you're at a crossroads at work, pause and think about the legal and ethical sides. Don't rush or give in to pressure. Ask yourself:

- Is this honest and fair?
- Does it follow the Code and the law?
- Does it make you feel proud of your choice?
- What would happen if it made the news?

When you are unsure, reach out to your People Leader.

Not following policies could have consequences, as outlined in the nCino Employee Handbook and local laws, which could include termination. Acting outside of the Code,

Company policies, or the law, is never acceptable— regardless of any financial targets or other goals you may have.

## The Code and Law Conflicts

We always aim to act within the law. The Code is drafted to be in compliance with the law. At times, however, the Code may be stricter than the law. In this case, always follow the Code. However, if you feel there is a conflict, please reach out to our Chief Legal & Administrative Officer or email [legal@ncino.com](mailto:legal@ncino.com) for guidance. Always act within the confines of the law and remember that it takes precedence.

## Lead by Example

### Setting the Standard at nCino

At nCino, leadership is about more than just guiding teams— it's about embodying our values and standards. Our leaders set the tone for an ethical, responsible, and positive workplace.

### What It Means to Lead by Example

**Represent Excellence:** Demonstrate integrity and ethical decision-making in every action.

**Open Communication:** Encourage honesty and transparency in all interactions.

**Empower and Inspire:** Motivate your team through your commitment to our values.

**Be Approachable:** Make it easy for others to come to you with concerns or ideas.

**Continuous Improvement:** Show a commitment to personal and professional growth, inspiring others to do the same.

Through leading by example, we create a culture at nCino where everyone strives to do their best, not just in their daily tasks, but in upholding the principles that define us as a Company.

## Resources

The following resources are available to you to seek advice or voice concerns:

1. People Leader
2. People Operations.
3. [Whistleblower Hotline](#)
4. Legal Team.

You can find nCino policies on the [nCompliance Sharepoint](#).

## Come As You Are

### Our Commitment to Equality

#### Commitment to Diversity and Inclusion at nCino

nCino believes strongly in the power of diversity and inclusion. We value the unique skills, backgrounds, and perspectives everyone brings. It's crucial for everyone at nCino to respect and support this diversity.

#### Creating an Open and Supportive Environment

We encourage open and honest communication. Feel free to discuss any job-related questions or concerns with your people leader or People Operations.

## Promoting Equal Opportunities

Our decisions, from hiring to promotions, are based on individual merit, regardless of background or personal characteristics. We're dedicated to a workplace free from discrimination.

## Fair Pay for All

nCino is committed to equal pay for equal work, ensuring all employees are compensated fairly and equitably.

We are dedicated to creating a workplace rich in diversity, and we always treat everyone with dignity, politeness, and respect.

## Promote a Friendly Workplace

### Harassment, Bullying, and Discrimination-Free

Here at nCino, we aim to treat everyone with kindness and respect. We don't stand for bullying, harassment, or any behavior that disrupts someone's work or makes the office uncomfortable. This standard applies to both in-person and online interactions.

We all play a part in recognizing and reporting bullying and harassment. We want you to feel empowered to report it without fear of retaliation. Harassment can include, but is not limited to, name-calling, making comments about someone's private life, telling hurtful jokes, unwanted teasing, unwanted advances, rude or mean comments, or intimidation. Harassment can happen between anyone, regardless of gender.

Sexual harassment can be defined not only as unwanted physical contact, but also in conversation such as telling inappropriate jokes, off-color comments, or sharing inappropriate stories.

## Reporting Discrimination or Harassment

We're committed to eliminating discrimination and harassment in our workplace. That means we take every report seriously, investigate thoroughly, and offer speedy solutions.

If you believe you've witnessed discrimination, harassment, or any other inappropriate behavior at work, please report it to your people leader, a member of People Operations, Legal, or use the [Whistleblower Hotline](#). This ensures the issue is addressed quickly and that the right steps are taken.

Rest assured, we'll do our best to keep your identity and the details of your report as private as possible, both during and after the investigation. We won't allow anyone who reports an incident or cooperates in an investigation face any backlash or retaliation. If you believe you or a coworker is experiencing retaliation, please report it right away.

Please understand that if you tell your people leader or someone else in a position of authority about an incident that has occurred or a comment that was made, they are obligated to investigate all reports of harassment.

## Health and Safety

### Workplace Safety at nCino

We all have a role in making sure nCino is a safe and secure place to work. That means you should never let someone else use your nCino access badge or swipe others in when entering the premises.

In the case of fire or another natural disaster, please refer to the emergency response and business continuity plans developed for your site. Make sure you understand the procedures before any emergencies occur.

The [Real Estate & Security Operations Team](#) is responsible for protecting nCino's premises and handling health, safety, physical security, emergency preparedness, and global travel

safety. If you have any concerns about physical safety, security, or hazards at any nCino location, please reach out to the Real Estate & Security Operations Team directly or @physical\_security on #slack.

## Emergency Preparedness

Follow the safety procedures posted around the workplace, stay aware of what's happening around you, and be part of our emergency preparedness and business continuity planning. Familiarize yourself with your department's emergency response and business continuity plans before any emergencies occur. If you notice injuries or unsafe conditions, report them promptly to your people leader or the [Real Estate & Security Operations Team](#).

## Workplace Violence

We have zero tolerance for workplace violence, which includes intimidation and threats. We also don't allow anyone to bring weapons onto our premises. If you see any inappropriate behavior, don't hesitate to report it to the appropriate Leader.

## Drugs and Alcohol

Our [Alcohol & Drug Policy](#) makes it clear that nCino is a drug-free workplace. This means you can't make, possess, store, distribute, transfer, buy, sell, use, or be under the influence of alcohol or illegal drugs while you're working or attending work-related activities on or off our premises.

Occasionally, we might have events where alcohol is served. If you choose to drink, please do so responsibly at Company-sponsored events. Keep in mind that illegal drugs are strictly forbidden at our offices or sponsored events.

If you need help with a drug or alcohol issue, you can find details about the Employee Assistance Program on the [nTranet](#).

## Non-Solicitation and Distribution

We love when our employees get involved in their communities and support causes they care about. However, you shouldn't use Company resources, such as Slack, to solicit asks from colleagues unless approved by the Company.

For example, you can ask your colleagues if they're interested in donating to a charity or non-profit organization you're passionate about. You should not, however, send out mass emails to the entire organization or be persistent with donation requests. People leaders especially should be advised not to pressure team members to make donations.

If you would like to get involved in our charitable initiatives, reach out to our Employee Experience team.

# Protecting nCino

## Valuing nCino Assets

### Company Assets and Information

We're the guardians of nCino's property, which can be defined both as physical assets and intellectual property.

To keep nCino's property safe, don't let anyone else use your nCino access card to access our premises. Be mindful of anyone attempting to "tailgate" you or follow you into the building under your card swipe.

nCino funds should only be spent in accordance with our [Signing and Spending Authority Policy](#) and our [Employee Travel and Expense Reimbursement Policy](#).

### Use of Company Assets

nCino allows you the use of our computers and electronic tools to complete the tasks assigned to you. nCino computers should be used only for work purposes. It is your responsibility to keep them secure. Keep passwords safe and be mindful of how you use your computer (i.e. what you download). If necessary, nCino is allowed by law to monitor what is on our devices and how they are being used.

### Return of Company Property

It is your responsibility to ensure the safety and confidentiality of any documents or Company property you're in charge of. Any Company property in your possession if you are terminated or choose to leave the Company is expected to be returned immediately.

## Money Laundering

Money laundering is a financial crime which involves the processing of illicitly obtained funds through a sequence of transactions. These transactions are designed to obscure the origin of the money and make it appear as though it came from legitimate sources. If you think an nCino service or product is being used for this, alert your people leader and/or the [Whistleblower Hotline](#) immediately.

## Keeping Accurate Records

### Keeping Business Records

It is your responsibility to manage official business records following nCino's rules. This means:

- Making sure financial data is recorded and reported correctly without leaving out any important information.
- Keeping all documents related to money, legal items, investigations, audits, and any other records as required by our [Corporate Record Retention and Disposal Policy](#).
- Safely disposing of business records when they're no longer needed in accordance with our [Corporate Record Retention and Disposal Policy](#).

### Accurate Accounts and Records

Business records serve as official documentation of all financial transactions, communications, and activities in which a company engages. Business records could be, but are not limited to, reports, letters, notes, charts, advertisements, meeting notes, timesheets, benefit forms, and accounts, and may be kept either on paper or digitally.

We owe it to our business and team to keep our accounts and records honest, complete, punctual, and readable. Accurate records help us make decisions which demonstrate our

integrity. Company documents should be handled with the utmost integrity, and all materials reflected in them should be correct, honest, and up to date. When handling Company funds, be sure to follow Company procedures and guidelines. Consult with Legal if necessary to ensure all your transactions are in accordance with the law.

Any info you give to regulators and investors should be truthful, on time, and easy to understand.

## Protect Confidential and Proprietary Information

### Confidential and Proprietary Information at nCino

nCino's intellectual property (IP) and proprietary information are vital to our success. They make us unique and distinguish us in the marketplace. Because we are a publicly traded company, some materials are defined as non-public information. Examples include:

- Confidential or non-public information about nCino, our partners, the people from whom we receive services, prospective and current customers, and coworkers
- Any information related to our financial success and performance, including significant deal signings or renewals, booking targets, or quarterly or annual results
- Personal information about our customers, such as customer names, contact details, or other private information
- Our business plans, strategic initiatives, trade secrets, inventions, pricing, or source code, as well as any applications. Patents, trademarks, and copyrights classify as public information

Always err on the side of caution. If you are not sure it is information you should be sharing, assume it's confidential. Ask leadership for any clarifications you may require.

Be sure you are familiar with our [Insider Trading and Confidentiality Policy](#).

## Intellectual Property

Intellectual property (“IP”) refers to our trademarks, brands, logos, copyrights, patents, inventions, trade secrets, source code, and other confidential information.

Your contributions through your role at nCino become the intellectual property of nCino. Understand that any contribution you make does not remain your intellectual property should you choose to leave your role. The rights to your ideas and creations outside your role at nCino, however, remain yours, but only if no Company time or resources were used in the process and only if the idea is outside of the scope of nCino’s present and planned business activities. Additionally, if you work on a project outside your role that is based or built on nCino code or an nCino solution, you assign the rights to that intellectual property because it was created with, derived from, or related to nCino products. If you are unsure about intellectual property rights, consult with a member of our Legal team.

## Protect Team Member Information

### Employee Personal Data

We're committed to keeping your personal info safe and private. At nCino, we handle your personal data following our [Employee Privacy Notice](#), our privacy and security rules and the law. Only nCino employees and outside vendors who require your information for work purposes have access to your personal info. We'll only share your personal information if we're required by law. With your permission, for reference checks, we'll share your job title and the time during which you were employed at nCino.

As an nCino employee, you should never share any personal information regarding your teammates with anyone. This includes a colleague’s address, phone number, or other personal information - even if it is just to send flowers.

If you have any questions, reach out to People Operations or Legal.

# Doing the Right Thing

## Avoiding Conflicts of Interest

### Conflicts in General

A conflict of interest is when your personal interests are in opposition, or seeming opposition, with your role at nCino. As an nCino employee, we expect you to always act in the best interests of nCino. Conflicts of interest can emerge in a number of ways, such as owning part of a company that does business with nCino or finding other business opportunities through your nCino job.

Even the appearance of conflict of interest can harm nCino's business and reputation. This is when someone might question your choices about whether an action is best for nCino. For example, if you become too close to employees at a company or institution who does business with nCino, it could appear as though they're receiving special treatment—even if they're not.

**Example Scenario:** You own stock in a company that specializes in internet searches. In your nCino role you are asked to choose an internet search company. If you were to recommend spending nCino's advertisement budget on that particular company, in which you own stock, it could appear you're making that selection out of personal interest—even if they really are the best option. Before the Company commits to a contract, you should consult with Legal and explain the conflict of interest. Because at nCino, we always aim to Do the Right Thing, even an appearance of a conflicted interest should be avoided.

If you find yourself in a position that could cause real, possible, or the appearance of conflicts of interest, alert the Legal team immediately.

## Engaging with Family and Friends

We love when nCino team members help us find new employees through their friends and family. Before you recommend anyone, though, you should let us know about any kind of connection to or relationship with the hiring manager. We want to be sure we bring on employees because they're right for nCino, not just because they're connected to our employees.

If you are someone in charge of hiring for your team or a specific role, you shouldn't recommend anyone you are connected to for that particular position. Instead, you should recommend your candidate for a role in a different department where there is no direct connection to you.

We're careful to keep our family and personal ties from getting in the way of our jobs at nCino. If you're doing business for nCino with a company where a family member or a close friend works and they make important decisions, you should let Legal know. They'll check if there might be a conflict of interest and may ask you to excuse yourself from that position.

## Working with Family and Friends

You should not be in charge of or use your influence to favor someone you're close to because of family or personal ties. If you have a personal relationship with a coworker that could create a problem, you should notify your people leader who will work with People Operations to determine if there's a conflict. If so, we'll need to take steps to correct it. Under certain circumstances, nCino might need to change your roles or make another change to ensure there's no real or possible conflict of interest.

## Investments and Business Relationships at nCino

nCino employees should never be involved in outside business deals that could make anyone wonder if you're making decisions for nCino that aren't in our best interest. Tell Legal if you or someone in your household has a significant investment or interest in a company

that competes with, buys from, or sells to nCino, especially if it could affect your judgment or look like it's for your own gain.

If you're not sure whether your investment or interest counts, or if a company is a competitor, customer, or supplier of nCino, reach out to Legal for help.

If we can't manage a conflict, you might need to sell some or all of your personal investments or avoid working with these companies on nCino's behalf.

## Corporate Opportunities

When you find opportunities that could help nCino, remember to put nCino's interests first. Don't use what you know about nCino for your own gain, like investing in a company or property that nCino is interested in. Aside from violating the Code, this course of action could violate the [Insider Trading and Confidentiality Policy](#) and the law. If you come across a business or investment opportunity through your nCino job, talk to Legal before proceeding.

## Board and Advisory Board Memberships at nCino

Before taking up a position on the board or advisory board of any for-profit organization, you should get approval from your people leader and Legal. If the organization is a public company, you'll also need pre-approval from the Chief Legal & Administrative Officer.

For non-profit organizations, you should disclose your board membership or advisory position to Legal in advance. If you're serving on the board of a governmental body, educational institution, or residential board that doesn't conflict with nCino's business, you don't need prior approval. If you're not sure if there's a conflict, reach out to Legal for guidance.

## Outside Employment

If you're interested in a second job, be sure to talk through the opportunity with your people leader. nCino employees cannot accept positions of any kind at companies that could be

considered as competing with nCino in any way. You'll also need to consider if the time required has the potential of interfering with your nCino responsibilities. Regardless of the type of outside employment, you'll need approval from your people leader and People Operations. You are not able to accept any position that requires you to work during nCino time or that requires use of nCino property. Please note that approval for outside employment could be withdrawn if a conflict presents itself or the time dedicated to outside employment begins to interfere with your employment with nCino.

## Bribery and Corruption

Bribery is illegal and goes against nCino's mission and values. It also poses a threat to sustainable economic development and can undermine institutional stability, especially in less affluent communities. At nCino, we strictly prohibit any form of bribery, and we do not engage in bribery under any circumstances.

Doing business at nCino is based on the quality of our services and ethical practices, not bribery or unethical behavior. Bribery, whether involving a government official or anyone else, is a serious offense that can result in criminal penalties and financial consequences for both the Company and individual employees.

Our commitment to integrity is unwavering. If anyone demands a bribe from an nCino employee, regardless of the amount, it must be declined, and the incident should be promptly reported to Legal.

## Third-Party Responsibility at nCino

nCino can be held accountable for acts of bribery committed by associated third parties, including our subsidiaries, joint ventures, partners, agents, and representatives. If you suspect any illegal or unethical actions by an associated third party, please contact Legal.

## Gifts and Entertainment

We believe in maintaining professional and ethical relationships with our customers and business partners. While it's acceptable to engage in reasonable entertainment and exchange modest gifts, it's crucial that these gestures do not compromise your ability to make impartial business decisions or create the perception of bias. You must not use gifts, entertainment, or other items to exert improper influence on our teams.

Consider the "Two C's" - Context and Common Sense:

- Context: If accepting a gift or attending an event could reasonably be seen as a conflict of interest, it should be declined.
- Common Sense: If your instincts raise concerns about the appropriateness of a gift or event, it's best to decline.

## Gift Giving and Receiving

You may engage in the exchange of customary and unsolicited business gifts and courtesies, such as:

- Items with a corporate logo
- Gift baskets of food
- Flowers or plants
- Tickets to local sporting events
- Gifts for significant life events, like births or weddings

These gifts and/or courtesies must not be excessive in value (i.e., do not exceed \$100).

## Prohibited Gift Exchanges

The following types of business gifts are strictly prohibited:

- Cash or cash equivalents, including gift cards or cash vouchers
- Expensive tickets to major cultural or sporting events (e.g., Olympics, Super Bowl)

- Extravagant gifts, like jewelry or luxury items

Gifts should never be so lavish that they could be mistaken for bribes. Business gifts and/or courtesies are permissible only when given and accepted without an express or implied understanding that the individual is in any way obligated by his or her acceptance of the gift. Gifts that are outside these guidelines may not be accepted without the prior written approval of the Company's Chief Legal Officer or in the case of directors, from the Chairman of the Board. If you have any doubts or need an exception based on business justification, consult Legal guidance.

## Respecting Privacy & Security

### Privacy

Respecting our customers' privacy is paramount as they entrust us with their personal information. Protecting customer's personal information is also required by law. We maintain a high standard of privacy protection.

We handle customer information, including contact details, financial data, and transaction records, exclusively for legitimate business purposes. Our actions adhere to privacy and information security policies, contractual obligations, as well as relevant laws.

If your role involves access to customer data, it is your responsibility to safeguard that information and to only use it in accordance with the rights granted to nCino. Unauthorized sharing of customer data, both internally and externally, is strictly prohibited. Any external sharing of customer data must receive approval from Legal.

For detailed information, refer to [nCino's privacy and information security policies](#). If you suspect a violation of our policies or the law, promptly contact Legal.

## Cybersecurity

We recognize the critical role of cybersecurity in safeguarding nCino and customer information. Our cybersecurity program and policies are designed to ensure the confidentiality, integrity, and availability of our information systems. Cybersecurity is integrated into the development and enhancement of our products.

In your role, you should only gather information that has a clear business reason and is necessary for a legitimate business purpose. You should also be sure that the collection of the data from the targeted source does not violate contractual obligations of nCino or applicable law. If you have any questions, reach out to Legal.

If you encounter any cybersecurity concerns, do not hesitate to reach out to Legal or Information Security immediately.

## Trading Inside Information

### Insider Trading

Laws prohibit trading in Company securities if you have Material Non-Public Information. This information should not be used for unfair stock trading advantages or shared with others who might do so. Employees should also avoid trading nCino stock during specific black-out periods, which vary depending on your employee classification.

For the rules and requirements regarding trading in nCino stock, please refer to nCino's [Insider Trading and Confidentiality Policy](#).

If you have questions about insider trading or related matters, you can find more information in nCino's resources or consult with Legal.

## Tipping

We should never share Material Non-Public Information with others, whether they are family, friends, or anyone else, so they can trade in stock, either for themselves or on our behalf. Tipping is illegal and against nCino's [Insider Trading and Confidentiality Policy](#), just like insider trading.

**\*Material Non-Public Information** refers to information that has not been made public yet and would influence a reasonable investor's decision to buy, sell, or hold Company stock. This can include various details like financial results, significant legal matters, major business deals like partnerships, potential mergers, acquisitions, or divestitures, and announcements of new products.

## Conducting Business Fairly and Honestly

### Competition and Fair Dealing

Competition laws are designed to promote competition in the marketplace and protect consumers. Examples of prohibited conduct under competition laws include:

- Agreeing with competitors about prices
- Agreeing with competitors to rig bids or allocate customers or markets
- Agreeing with competitors to boycott a supplier or customer
- Charging unfair prices
- Limiting production of goods or services

Other activities can also be illegal, unfair, or create the appearance of impropriety. These activities include sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors. Note that these guidelines apply regardless of setting, including somewhere such as conference where multiple competitors are present. If you are party to such conversations, report such incidents to your people leader and Legal immediately.

At nCino, we compete aggressively, but fairly, and in compliance with antitrust, competition, and other applicable laws aimed at promoting free and open competition. You must act with honesty and integrity in all your business dealings and relationships, and you must never mislead or deceive anyone or engage in any other form of unfair business practice.

Although the spirit of these laws is straightforward, their application to particular situations can be quite complex. It's important to seek guidance from Legal about relevant laws and policies.

## Collecting and Using Market Information Ethically

We collect, share, and use information about nCino's markets, including details about our competitors and their products and services, to support our business. It's crucial that we gather this information ethically and without violating laws or confidentiality obligations. Here's what you need to keep in mind:

- Never ask or encourage job applicants or new employees to disclose confidential information from their current or former employers.
- While it's acceptable to inquire about competitors when talking to customers or third parties, you should never misuse a business relationship to inappropriately access information related to a competitor.
- If a prospect or new employee discloses information that you think may be the confidential information of a third party, report this to Legal immediately.

For additional guidelines on gathering market information, please refer to nCino's [Competitive Intelligence Policy](#).

## Intellectual Property of Others

We keep trade secrets confidential, whether they belong to us, our partners, competitors, or others who share them with us. We also respect trademarks, copyrights, and patents owned

by others and avoid infringing on their intellectual property rights. We always seek permission to use copyrighted material, and Legal can help with this.

nCino frequently receives business proposals. The way Legal properly handles them is by asking the proposing person to sign an agreement that protects us from any future claims of theft. After reviewing the proposal, if we think there's some value in pursuing the idea, we can enter into a Non-Disclosure Agreement that protects both parties. Ask Legal for assistance when these circumstances arise.

# Interactions With Governments

## We *Never* Bribe Government Officials

### Bribery and Corruption

We do not engage in bribery or corruption. This means we never offer anything of value to gain an unfair advantage, influence decisions, or avoid legal consequences. If you are asked to do so, contact Legal immediately.

To minimize risk, always document commission or finder's fee arrangements with a legal contract that follows industry standards.

### Gifts and Entertainment

When offering gifts, entertainment, or meals to government officials or State-Owned Enterprise employees, we must follow strict laws and regulations. You should never provide anything of value to these individuals without obtaining approval as outlined in the [Anti-Corruption Policy](#).

### Government Officials

Government Officials include individuals employed in government ministries, statutory bodies/agencies, regulatory authorities, central banks, law enforcement agencies, and the judiciary, among others.

### State-Owned Enterprise (SOE)

A State-Owned Enterprise (SOE) is a legal entity established by the government to engage in commercial activities on behalf of the government. SOEs can be wholly or partially owned by the government and are typically involved in various commercial endeavors. They are considered integral parts of the State.

## Personal Political Activities

### Engaging in Political Activities

Anyone at nCino can take part in political activities and donate to political causes on their own behalf. However, when you do this, make sure you use your own time and money, not nCino's resources. Don't make it seem like nCino supports your political views. For more information see the [Anti-Corruption Policy](#).

### Trade Compliance

Some governments have rules about what can be traded in and out of their countries. They also have restrictions on doing business with certain people or countries involved in illegal activities. We follow these rules for our international business.

To make sure you follow these laws, ask our Legal team before:

- Sending software or items to another country
- Doing business with a country or person that's restricted

If you're asked to boycott a person, company, or country, or if you need to provide information about our relationships with these, let Legal know.

### Lobbying

Lobbying means talking to people in the government to help our Company. We follow the rules in each place where we do this. Before you talk to any government on behalf of nCino, you need permission from Legal.

### Different Rules in Different Places

The rules for talking to the government are different in each country. What's acceptable and legal in one place might not be in another. If you need to meet with government officials about our business, first contact Legal.

## Requests from Government Officials

Sometimes, government officials ask for information, and it's important to respond quickly and keep it private. When this happens, remember:

- Tell our Legal team about the request right away.
- Make sure all the information you give is complete and correct.

# Connecting with the Public

## Honesty in What We Say

### Advertising and Marketing at nCino

We're committed to ensuring that our Company's communications are accurate, reflect our views, and come from employees authorized to speak for us. This means we need to research and document every claim in our ads and marketing materials before publishing them to make sure they are truthful, fair, and provable.

As part of our dedication to Doing the Right Thing, we don't make false or tricky claims. If you're unsure about whether a claim might be seen as untrue or misleading, you can get advice from our Legal team.

### Comparing Our Ads

The rules for comparing our ads with others, like pricing, can be different in each country. It's important to ask our Legal team for guidance before making such claims to make sure we follow the laws.

### Using Social Media

When we use social media for advertising and marketing, we have to follow certain rules. You can learn more by referring to nCino's [Social Media and Public Relations Policy](#) or by reaching out to our [Public Relations & External Communications Team](#). For personal Social Media Use, please see "Responsibility with Social Media," found later in this Code.

### Public Speaking

We believe in speaking with one clear voice when talking about nCino. Incorrect or misleading statements can be risky for the Company, so it's important to only speak on

behalf of nCino if you have authorization to do so. If you have questions, reach out to the Public Relations & External Communications Team.

## Public Statements and Endorsements

Before making any public statements or endorsements about nCino, our products, or our business, you must get approval from our Public Relations & External Communications Team. If it's about our financial or operational performance, you should talk to Legal - most likely it is not appropriate to make Public Statements about these things.

## Guidelines for Speaking and Statements

Here are some guidelines for speaking publicly:

- Always direct reporters or the media to nCino's Public Relations & External Communications Team.
- If you're not already an approved spokesperson, don't agree to media interviews.
- If a reporter asks you about something, you can say, " I can connect you with someone from Public Relations & External Communications."
- Don't share secret information about our future products, internal rules, or other confidential items.
- Always be polite and friendly.

## Responsibility with Social Media

### Using Social Media at nCino

We know that social media is an important way for connecting and sharing things. Some of us have personal web pages, blogs, or social media profiles where we might talk about our work at nCino. Using these platforms to share our knowledge and ideas with others is perfectly acceptable.

When you talk about nCino or your work on social media, remember:

- You can say that you work for nCino but emphasize that you are sharing your own thoughts.
- Make sure the facts about nCino are correct.
- Be respectful and use good judgment.
- Ask yourself if what you're posting matches nCino's vision.

## Posting on Social Media

Follow all nCino rules when you post on social media, especially when talking about nCino or our industry. If the media, investors, or government officials ask about nCino, direct them to Public Relations & External Communications or Legal.

Don't share secret information about nCino or our partners.

Remember to be respectful, professional, and ethical when using social media. It's important to keep the line between your personal and work life clear. If you act inappropriately on social media, it could lead to trouble at work. What you post online matters.

## Community Involvement

### Environmental Stewardship at nCino

At nCino, we are committed to being responsible environmental stewards. Our goal is to reduce our environmental footprint by minimizing our use of natural resources. We engage in sustainable business practices, support environmental initiatives through volunteer work and donations and adhere to environmental laws and our own green policies. We focus on reducing environmental risks, conserving resources, and managing our energy use efficiently. For more information about our environmental strategy, please refer to nCino's [Environmental Sustainability Policy](#).

## Community Involvement & Charitable Contributions

nCino is dedicated to strengthening communities and promoting financial well-being. We strive to find a balance between our business objectives and our community commitments. We engage with various civic, charitable, and philanthropic groups to make impactful connections. For all community and charitable activities, remember to:

- Review and approve requests for donations with Employee Experience, including obtaining Legal approval for corporate gifts.
- Get authorization from Employee Experience before representing nCino at community events, using Company funds for donations, or making contributions in nCino's name.

We support and encourage each other to actively engage in our communities.

# Administrating the Code

## Last Updated

This edition of the nCino Code of Business Conduct & Ethics became effective as of February 3, 2026.

## Code Administration

The Code is applicable to all nCino employees, officers, and directors, as well as contingent workers and others acting on our behalf.

## Investigations

We quickly and thoroughly investigate any potential or reported breaches of the Code, while respecting confidentiality and legal requirements. Everyone is expected to fully cooperate and provide honest information during these investigations.

## Discipline

To safeguard nCino and our team, we address Code and/or legal violations swiftly. Actions may include remedial measures (such as training or enhanced controls) or disciplinary steps, determined in collaboration with People Operations, Legal, and the employee's people leaders. nCino will also cooperate with legal authorities in cases of potential legal violations.

## Fundamental Principles

The Code outlines key principles guiding our conduct but does not establish specific employment rights or guarantee employment duration.

## Waivers of the Code

Waivers for Board or Executive Leadership Team members can only be granted by the Board of Directors and will be disclosed as legally required. For other employees, waivers may be granted by the Chief Executive Officer, upon the advice of the Chief Legal & Administrative Officer. Contact Legal for questions about waiver requirements.

## Acknowledgement

Employees must complete an online training about the Code and affirm their compliance with it each year.