

**GREENIDGE GENERATION HOLDINGS INC.**  
**CODE OF BUSINESS CONDUCT AND ETHICS**

**I. Introduction**

This Code of Business Conduct and Ethics (this “Code”) provides a broad overview of the basic ethical principles that we share at Greenidge Generation Holdings Inc. and its subsidiaries (collectively the “Company”) and that guide our conduct. This Code sets forth requirements for honest and ethical conduct, ensures compliance with applicable governmental laws, rules and regulations and provides accountability for adherence to this Code. This Code applies to our directors, officers and employees (“Covered Persons”) and should be provided to and followed by our agents and representatives, including our consultants. Violations of this Code may result in disciplinary action, varying from reprimand to termination. Should you have any questions regarding these policies, please contact your supervisor or (i) the Company’s Chief Compliance Officer, or (ii) in the event that there is no Chief Compliance Officer, the General Counsel or (iii) in the event that there is no Chief Compliance Officer or General Counsel, the Chief Executive Officer (in each case, the “Designated Officer”).

The Company’s good name and reputation depend, to a very large extent, upon you taking personal responsibility for maintaining and adhering to the policies and guidelines set forth in this Code. Your conduct on behalf of the Company must be guided by the ethical principles, policies and guidelines set forth in this Code.

**II. Conflicts of Interest**

A conflict of interest is a situation where a Covered Person’s personal or professional interests (or those of an immediate family member or other close relative or friend or any other person who may act on such Covered Person’s behalf) can affect his or her ability to act in the Company’s best interests or interfere (or appear to interfere) with his or her personal objectivity and obligations to the Company. All Covered Persons should engage in honest and ethical conduct, including avoiding any actual or apparent conflicts of interest. All Covered Persons are charged with acting in the Company’s best interests at all times. Employees and officers may not hold outside employment that interferes with their job performance at the Company, nor may they accept compensation, in any form, for services performed for the Company from any source other than the Company. Officers and directors should also refer to the Company’s Related Party Transactions Policy for additional information. Consistent with the rules of the Nasdaq Capital Market (“Nasdaq”) and Section XIV below, any waiver of this conflict of interest policy for a director or executive officer may only be made by the Board of Directors of the Company (the “Board”), and any such waiver should be promptly disclosed to the Company’s stockholders.

All Covered Persons are obligated to continually evaluate their personal and employment situations and promptly report to the Designated Officer any material transaction or relationship that could be expected to give rise to an actual or apparent conflict of interest.

If you become aware of a business or financial opportunity as part of your work with the Company, you are not permitted to use any such information or usurp that opportunity for your own personal gain. You may not use Company property or information or your position with the Company for personal gain and should not compete with the Company or any of its affiliates directly

or indirectly.

### **III. Record-Keeping**

We require honest and accurate recording and reporting of information in order to make responsible business decisions. We document and record our business expenses accurately. In the filing of expense reports, Covered Persons must distinguish between personal and business travel expenses, business conference expenses and business entertainment expenses. Questionable expenses should be discussed with the appropriate personnel in our accounting department. All of our books, records, accounts and financial statements are maintained in reasonable detail, appropriately reflect our transactions and conform both to applicable legal requirements (including generally accepted accounting principles) and to our system of internal controls.

We avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies in our business records and communications. No entry may be made that intentionally hides or disguises the true nature of any transaction. No unrecorded fund, reserve, asset or special account shall be established or maintained for any purpose. No false or fictitious entries shall be made in books, records, accounts or in Company communications for any reason.

All records, including but not limited to accounting and financial records, must be maintained in compliance with applicable statutory, regulatory and contractual requirements, as well as our record retention policies. In accordance with those policies, in the event of any litigation or governmental investigation concerning our records or communications, please consult with the Designated Officer if you have any questions.

### **IV. Public Reporting**

We are a public company and as a result file reports and other documents with the Securities and Exchange Commission (the “SEC”) and Nasdaq, on which our common stock trades. In addition, we issue press releases and make other public statements in accordance with the Company’s Corporate Disclosure Policy that include financial and other information about our business, financial condition and results of operations. We endeavor to make full, fair, accurate, timely and understandable disclosures in reports and documents we file with, or submit to, the SEC and in our press releases and public communications.

We require cooperation and open communication with our auditors. It is illegal to take any action to fraudulently influence, coerce, manipulate or mislead any auditor engaged in the performance of an audit of our financial statements.

The laws and regulations applicable to filings made with the SEC, including those applicable to accounting matters, are complex. While the ultimate responsibility for the information included in these filings rests with Company management, numerous other employees participate in the preparation of these filings or provide information included in these filings. We maintain Disclosure Controls and Procedures to ensure that the information included in these filings is collected and communicated to Company management in order to permit timely disclosure of such information.

If you are requested by Company management or the Disclosure Committee as established and constituted by the Board from time to time (the “Disclosure Committee”) to provide, review or

certify information in connection with the preparation of a filing to be made with the SEC, you must provide the requested information in a full, accurate and timely manner. Moreover, even in the absence of a specific request, you should report to the Disclosure Committee any significant information that you believe should be considered for disclosure in our filings with the SEC.

If you have questions or are uncertain as to how our Disclosure Controls and Procedures may apply in a specific circumstance, promptly contact your supervisor or the Designated Officer. Additional information regarding how to report your questions or concerns (including on a confidential, anonymous basis) is included in Section XIII below.

## **V. Competition and Fair Dealing**

We compete fairly and honestly. We do not engage in unethical or illegal business practices such as stealing proprietary information, possessing trade secret information that was obtained without the owner's consent or inducing disclosure of this type of information by past or present employees of other companies. We must never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. Any questions or concerns a Covered Person may have about competitive activity must be discussed and resolved with the Designated Officer.

## **VI. Discrimination and Harassment**

The diversity of our employees is a tremendous asset. We provide equal opportunity in all aspects of employment and will not tolerate discrimination or harassment of any kind. The Company is committed to providing a workplace free of discrimination and harassment based on race, color, religion, age, gender, national origin, ancestry, sexual orientation, disability, veteran status or any other basis prohibited by applicable law. Examples include derogatory comments based on a person's protected class, sexual harassment and unwelcome sexual advances. Similarly, offensive or hostile working conditions created by such harassment or discrimination will not be tolerated. Concerns or reports of any discrimination or harassment should be raised through the appropriate reporting channels set forth in Section XIV.

## **VII. Healthy and Safe Workplace**

We believe that a healthy and safe work environment is a prerequisite for all Company activities and operations. We ensure a healthy and safe work environment by complying with all applicable health and safety laws, directives, regulations and other requirements and promptly reporting accidents, injuries and unsafe equipment, practices or conditions to a supervisor or more senior manager. Company management will demonstrate health and safety leadership and help foster a culture for all employees to embrace the principles in this Code and apply them to their daily work. While the ultimate responsibility for ensuring a healthy and safe work environment lies with Company management, every employee of the Company has an individual responsibility to understand and comply with this Code to help create a healthy and safe workplace for us all. We will provide all employees and officers with access to sufficient training, resources and systems as necessary to ensure a healthy and safe work environment. Employees should immediately report any unsafe conditions or activities pursuant to the appropriate reporting channels set forth in Section XIV.

We do not permit violence or threatening behavior in the workplace. Examples of such behavior may include conduct such as bullying, cyberbullying, teasing and abusive and other aggressive behaviors. Workplace violence is not only an employee health and safety issue but also may be a criminal law issue. Consequently, workplace violence and threatening behaviors will not be tolerated, and every incident will be investigated.

We expect all employees to report to work in a condition suitable for performing our duties at our best, free from the influence of illegal drugs, alcohol and other mood-altering substances. Abuse of illegal drugs, alcohol and other mood-altering substances poses a substantial risk to the health and safety of our employees and property. As such, we do not tolerate the use of such substances in the workplace.

### **VIII. Protection and Proper Use of Company Assets**

Theft, carelessness and waste of Company assets have a direct impact on our profitability and should be avoided. Any suspected incident of fraud or theft should be promptly reported to your supervisor or, if appropriate, the Designated Officer for investigation.

We carefully safeguard our confidential information. Unauthorized use or distribution of confidential information is prohibited and could also be a violation of applicable law, resulting in civil or even criminal penalties.

Also essential to our success as a Company is our ability to develop and increasingly use state-of-the art technology in day-to-day operations. The Company's intellectual property is one of its most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise and other intangible industrial or commercial property. The Company's employees and representatives must protect and, when appropriate, enforce its intellectual property rights. The Company also respects intellectual property belonging to third parties. It is the Company's policy not to knowingly infringe upon the intellectual property rights of others.

### **IX. Protection of the Environment**

The Company is also committed to the protection of the environment, the conservation of natural resources and the minimization of any adverse impact our operations have on the environment. Our values are demonstrated by our compliance with applicable environmental legal requirements and our actions to continually build a workplace culture of sustainability. Employees and officers are also encouraged to consider economic, social and environmental factors in their day-to-day strategic planning, decision making and operations. Covered Persons are encouraged to report conditions that they perceive to be unsafe, unhealthy or hazardous to the environment.

### **X. Confidentiality**

In carrying out the Company's business, Covered Persons may learn confidential or proprietary information about the Company, its customers, distributors, suppliers or other third parties. Confidential or proprietary information includes all non-public information relating to the Company, or other companies, that would be harmful to the relevant company or useful or helpful

to competitors if disclosed, including financial results or prospects, information provided by a third party, trade secrets, new product or marketing plans, research and development ideas, potential acquisitions or investments or information of use to our competitors or harmful to us or our customers if disclosed.

Covered Persons must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized in accordance with the Company's Corporate Disclosure Policy. In connection with this obligation, some or all of our employees will be required to execute confidentiality agreements upon commencement of employment with the Company. The terms of these confidentiality agreements (which may be contained within an agreement of employment) should be periodically reviewed for additional detail. Covered Persons must safeguard confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job and avoiding discussion of confidential information in public areas. This prohibition includes, but is not limited to, inquiries made by the media, analysts, investors or others. Covered Persons may not use such information for personal gain. Any question about whether information is confidential should be directed to the Designated Officer.

## **XI. Compliance with Laws, Rules and Regulations**

The Code serves as an important resource for the Company's employees and representatives in support of day-to-day decision making. The Code should be used as a resource when questions of legal or ethical appropriateness arise. It is not a comprehensive rulebook, but rather a statement of how the Company is committed to doing business. The Company is obligated to comply with all applicable laws, rules and regulations. It is the personal responsibility of each Covered Person to adhere to the standards and restrictions imposed by these laws, rules and regulations in the performance of his or her duties for the Company. Each Covered Person should also be alert to changes in the law or new requirements that may affect their business unit, as well as new products or services that may be subject to special legal requirements.

## **XII. Payments to Government Personnel**

The Company is committed to complying with all applicable laws that prohibit corrupt payments to government officials and employees of government-owned or controlled businesses, including, but not limited to, the U.S. Foreign Corrupt Practices Act (the "FCPA"). In compliance with such laws, we do not give anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business (a "Corrupt Payment"). We do not promise, offer or deliver to any foreign or domestic government employee or official or any third party any gift, favor or other gratuity that would be illegal. All allegations of corruption will be taken seriously and thoroughly investigated, with violations resulting in discipline up to and including termination.

This anti-corruption policy applies to all Covered Persons and the agents and representatives of the Company. Such persons are prohibited from (a) offering, giving, promising or authorizing someone else to offer, give or promise any Corrupt Payment, (b) offering, giving, promising or authorizing someone else to offer, give or promise a payment or anything of value to any government official without the prior written approval of the Designated Officer and (c) making a payment or giving anything of value to any government official to expedite any administrative or legal action. Such persons are required to (i) fully disclose and closely monitor payments made to

any government official for legitimate purposes, (ii) maintain accurate financial books and records of all payments made to government officials and (iii) exercise due diligence when selecting persons or firms to represent the Company and require such persons to comply with the FCPA, all applicable anti-corruption laws and the terms of this anti-corruption policy.

The laws or customs of other countries in which we operate may be less clear. It is our policy to comply with those laws or customs; however, if a local law or custom seems to contradict the principles described in this Code, or if you have any questions regarding this anti-corruption policy, please contact your supervisor or the Designated Officer for further guidance.

### **XIII. Insider Trading**

Trading on inside information is a violation of federal securities law. Covered Persons in possession of material, non-public information about the Company or companies with whom we do business must abstain from trading or advising others to trade in the respective company's securities from the time that they obtain such material, non-public information until adequate public disclosure has been made regarding such information. Information is considered "material" if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell or hold a security or where such information is likely to have a significant effect on the market price of the security. To use non-public information for personal financial benefit or to "tip" others, including family members, who might make an investment decision based on this information is not only unethical but also illegal. Covered Persons who trade stock based on material, non-public information can be personally liable for damages totaling up to three times the profit made or loss avoided by the respective Covered Persons.

For additional information, please refer to the Company's Insider Trading Policy.

### **XIV. Reporting Illegal or Unethical Behavior**

In order to encourage reports of illegal or unethical behavior (including violations of this Code), we keep all reports confidential and do not allow retaliation for good faith reports of possible misconduct by others. It is also our duty to cooperate in internal investigations of alleged misconduct. If you observe or suspect any corrupt activity, please contact the Designated Officer immediately to report such activity. The Company does not tolerate retaliation against anyone who makes such a report in good faith. For further details, please refer to the Company's Reporting and Non-Retaliation Policy.

A report may be made anonymously to our toll-free confidential hotline (the "Whistleblower Hotline") that operates 24 hours per day, seven days per week and 365 days per year at the following website or telephone number:

Website: <https://app.integritycounts.ca/org/support>

Phone: 1-866-921-6714

We must all work to ensure prompt and consistent action against unethical or illegal behavior. Oftentimes a violation of this Code will be easy to recognize and should be promptly reported to a supervisor or, if appropriate, the Designated Officer. However, in some situations, it

may be more difficult to determine whether certain conduct is unethical or illegal. Since none of us can anticipate every situation that will arise, it is important that we have a way to approach a new or sensitive question or concern. Here are some questions that can be asked:

- (1) ***What do I need to know?*** In order to reach the right solutions, we must be as fully informed as possible.
- (2) ***What specifically am I being asked to do? Does it seem unethical or improper?*** This will focus the inquiry on the specific action in question and the available alternatives. Use good judgment and common sense. If something seems unethical or improper, it probably is.
- (3) ***What is my responsibility?*** In most situations, there is shared responsibility. It may help to get others involved and discuss the issue.
- (4) ***Have I discussed the issue with a supervisor?*** This is the basic guidance for all situations. In many cases, a supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is the supervisor's responsibility to help solve problems.
- (5) ***Should I seek help from Company management?*** In any case in which it may not be appropriate to discuss an issue with your supervisor, or where you would not be comfortable approaching your supervisor with your question, discuss it with the Designated Officer. If for some reason you do not believe that your concerns have been appropriately addressed, you may then seek advice from our Chief Executive Officer or Chief Financial Officer. Alternatively, we have established procedures to permit confidential, anonymous submissions of concerns regarding alleged violations of this Code, including concerns with respect to questionable accounting or auditing matters. Confidential anonymous submissions should be made through the Whistleblower Hotline or mailed directly to the Designated Officer at the principal executive office of the Company.

## **XV. Political Contributions**

Covered Persons may participate in the political process as individuals on their own time. However, they must make every effort to ensure that they do not create the impression that they speak or act on behalf of the Company with respect to political matters.

Covered Persons may not make any contribution of Company or client funds or services to any political party or committee, or to any candidate for or holder of any office of any government, unless such contribution is expressly permitted by law and has been pre-approved in writing by the Designated Officer. This prohibition covers not only direct contributions but also indirect assistance or support of candidates or political parties through the purchase of tickets to special dinners or other fund-raising events, and the furnishing of any other goods, services or equipment to political parties or committees.

If a Covered Person's position in the Company requires him or her to have personal contact with governmental entities and officials on behalf of the Company, he or she should be aware of

and understand all relevant regulatory provisions applicable to such contacts. Contact with government entities and officials may, at times, be considered as lobbying activities. Such activities are regulated at both the state and federal level.

No direct or indirect pressure in any form is to be directed toward any Covered Person to make any political contribution or participate in the support of a political party or the political candidacy of any individual.

#### **XVI. Waivers**

Consistent with Nasdaq rules, only our Board may waive a provision of this Code for our executive officers or directors, and any waiver should be promptly disclosed to the Company's stockholders. Waivers of this Code for any other employee may be made only by our Chief Executive Officer, and then only under special circumstances.

#### **XVII. Interpretation**

This Code should be interpreted and construed in the context of all applicable laws and the Certificate of Incorporation and Bylaws of the Company then in effect, as well as any other corporate governance documents.

#### **XVIII. Amendment**

The Board is committed to continuously reviewing and updating our policies, and the Board therefore reserves the right to amend this Code at any time, for any reason, subject to applicable law.

Approved and Adopted: September 3, 2021