

IONQ, INC.
CODE OF BUSINESS CONDUCT AND ETHICS

(Last amended as of February 4, 2026)

IonQ, Inc. and its subsidiaries (“IonQ”) is committed to maintaining the highest standards of business conduct and ethics. This Code of Business Conduct and Ethics (this “Code”) reflects the business practices and principles of behavior that support this commitment. We expect every employee, officer and director to not only read and understand the business practices and principles described below, but to also apply good judgment and the highest personal ethical standards in making business decisions. Please remember you should consider not only your own conduct, but also that of your family members, significant others and other people in your household. References in this Code to employees are intended to cover officers and, as applicable, directors.

Do not hesitate to ask questions about whether certain conduct may violate the code, to voice concerns or to clarify gray areas. You should also be alert to possible violations and report them without fear of retaliation. See Section 9 for instructions on how to ask questions or report violations.

Any employee who violates the standards in this Code may be subject to disciplinary action that, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to termination of employment and, in appropriate cases, civil legal action or referral for criminal prosecution.

Section 1. Legal Compliance. You must comply with all laws, rules, regulations and orders that apply to you and the conduct of our business, including both United States law and the laws of any other jurisdiction that may apply, including other jurisdictions through which you travel or in which you are based. We expect employees to understand the legal and regulatory requirements applicable to their areas of responsibility. While we do not expect you to memorize every detail of these laws, rules and regulations, you should know when to seek advice from others.

Section 2. Insider Trading. The Board of Directors of IonQ (the “Board”) has adopted an Insider Trading Policy for the Company that, among other things, prohibits employees from trading on inside information. If you have any questions about your obligations under the Insider Trading Policy.

Section 3. Conflicts of Interest. Employees must be free from influences that conflict with the best interests of IonQ or might deprive it of their undivided loyalty in business dealings. Even the appearance of a conflict of interest can be damaging and should be avoided. The following are some (but not all) situations that may involve problematic conflicts of interests: (a) employment by, consulting for or service on the board of a competitor, customer or supplier; (b) owning a significant financial interest in an entity that does business, seeks to do business or competes with us; (c) soliciting or accepting gifts, favors, loans or preferential treatment from anyone who does business or seeks to do business with us; (d) certain types of “moonlighting”; and (e) loans to, or guarantees of obligations of, employees or their family members by the Company. Conflicts of interest are prohibited.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, you should discuss the matter with the Legal Department and provide it with a written description of the activity. If the potential conflict involves the Legal Department, then you should discuss the matter with the Chief Financial Officer, unless it also involves him, in which case you should discuss it with the Chair of the Nominating and Corporate Governance Committee of the Board (the “Nominating Committee”).

Section 4. Corporate Opportunities. You may not take personal advantage of opportunities for IonQ that are presented to you or that you discover as a result of your position with us or through your use of corporate property or information. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved, even if you acquired the opportunity privately. You may not use your position with us or corporate property or information for improper personal gain, nor may you compete with us in any way.

Section 5. Fair Dealing. You must not engage in unethical or illegal business practices. Statements regarding IonQ's services must not be untrue, misleading, deceptive or fraudulent. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained or inducing improper disclosure of confidential information from employees of other companies is prohibited. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your supervisor or the Legal Department, as further described in Section 9.

You are expected to deal fairly with our customers, suppliers, employees and anyone else with whom you have contact in the course of performing your job. Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

Section 6. Company Assets. All employees are expected to protect our assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. Our property, such as office supplies, computer equipment, buildings and products, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use our corporate name, any brand name or trademark owned or associated with IonQ or any letterhead stationery for any personal purpose.

Section 7. Confidentiality. You must keep confidential information about IonQ or other companies that you learn and that is confidential and proprietary. Materials that contain confidential information should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects is prohibited. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas within IonQ, such as cafeterias. All of IonQ's emails, voicemails and other communications are presumed confidential and should not be forwarded outside the company, except where required for legitimate business purposes. Our employees are bound by the terms of the confidentiality agreements to which they agree in connection with their employment.

Section 8. Waivers. Any waiver of this Code for executive officers or directors may be authorized only by our Board or the Nominating Committee and will be disclosed as required by applicable law.

Section 9. Questions and Reporting Potential Violations. Your most immediate resource for any matter related to this code is your supervisor, who may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your supervisor. If you prefer not to consult your supervisor, you should feel free to discuss your concern with the Legal Department, which may be reached at legal-compliance@ionq.co. If you are uncomfortable speaking with the Legal Department, please contact the Chief Financial Officer. If you are uncomfortable speaking with the Chief Financial Officer, please contact the chair of the Nominating Committee.

If you are aware of a suspected or actual violation of this Code, you must promptly report it and we will take prompt disciplinary action against any employee who retaliates against you. The Legal

Department will investigate all reported possible violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances.

A hotline, which you may reach at 1-800-916-7037, company code 4667, is also available to those who wish to report violations of this Code, including concerns regarding auditing and accounting matters. You may call the toll-free number anonymously if you prefer, as it is not equipped with caller identification, although in that case the Legal Department will be unable to obtain follow-up details from you that may be necessary to investigate the matter. Whether you identify yourself or remain anonymous, your contact with the anonymous reporting service will be kept strictly confidential to the extent reasonably possible within the objectives of this Code.

If any investigation indicates that a violation of this Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination and, in appropriate cases, civil action or referral for criminal prosecution.