

SURVEYMONKEY GLOBAL INC.

Code of Business Conduct and Ethics

Adopted: August 29, 2018

Amended: July 30, 2023

We are a values-driven organization. Our values are more than just words to make us feel good, they are guiding principles for how we operate. They are our expectations for each other and ourselves. Our values drive our decisions and define our culture. We use them to measure our success.

I. Purpose

This Code of Business Conduct and Ethics (the "**Code**") was adopted to further the Company's commitment to conducting its business with honesty and integrity. This Code applies to all the employees, independent contractors, officers and directors (all of whom are referred to collectively as "**team members**") of SurveyMonkey Global Inc. and its affiliates (collectively, the "**Company**" or "**SurveyMonkey**").

The Code is intended to ensure and promote:

- fair and accurate financial reporting;
- ethical conduct and compliance with applicable laws, rules and regulations;
- the prompt internal reporting of violations of this Code as set forth in the Code;
- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- a culture of honesty and accountability; and
- the deterrence of wrongdoing.

The Code serves as a source of guiding principles, and the Company expects team members to use their own judgment at all times to follow the high ethical standards to which the Company is committed.

Team members are expected to read the policies set forth in the Code and ensure that they understand and comply with them. The Company's internal legal counsel is responsible for applying these policies to specific situations in which questions may arise and has the authority to interpret these policies in any particular situation. Any questions about the Code or the appropriate course of conduct in a particular situation should be directed to the Company's internal legal counsel, who may consult with the Company's outside legal counsel or the Company's Board of Directors (the "**Board**"), as appropriate.

The Code should be read in conjunction with other policies applicable to a team member. Any determination with respect to the applicability of the provisions of this Code with respect to officers or directors of the Company may be made only by the Board.

II. Financial Reports and Other Records

Team members are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to the Company. The Company expects all of its team members to take this responsibility very seriously to ensure full, fair, timely, and accurate financial reports.

Each team member to the extent involved in the Company's financial reporting process, including without limitation, the principal executive officer, principal financial officer and other senior team members who perform similar functions in the Company (collectively, "**Senior Financial Officers**"), must familiarize themselves with 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. Furthermore, all books, records, accounts and financial statements must conform both to applicable legal requirements and to the Company's system of internal controls. All assets of the Company must be carefully and properly accounted for. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation and authorization. Misclassification of transactions as to accounts, business units, or accounting periods is forbidden. Each team member bears responsibility for ensuring that he or she is not party to a false or misleading accounting entry.

III. Conflicts of Interest

A conflict of interest is any activity or interest that is inconsistent with or opposed to the best interests of the Company. A team member's decision and actions in the course of employment or other relationship with the Company should be based on the best interests of the Company and not based on personal relationships or benefits. Team members must never use or attempt to use their position with the Company to obtain improper personal benefits. Any situation, transaction or relationship that may give rise to an actual or potential conflict of interest must be disclosed to the Company and shall be avoided, unless approved by the Company.

The following are some examples of conflicts of interest to be avoided:

- Family Members. Team members may not conduct business on behalf of the Company with family members or an organization with which a family member is associated, unless such business relationship has been disclosed to and authorized by the Company and is a bona fide arms-length transaction. "Family members" include a child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law and any person (other than a tenant or team member) sharing the household of a team member or any person in an intimate relationship with a team member.
- Interests in Other Businesses. Team members may not accept compensation in any form for services performed for the Company from any source other than the Company. Team members should not have an undisclosed material financial interest in a competitor, supplier, customer or business partner of the Company.
- Improper Conduct and Activities. Team members may not engage in any conduct or activities that are inconsistent with the Company's best interests or that materially disrupt or impair the Company's relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship.
- Gifts and Gratuities. This Code does not prohibit normal, appropriate and modest hospitality to or from third parties. These customary courtesies are designed to build goodwill among business partners. You should, however, be mindful that public officials may be restricted in the benefits they can accept for performing their duties, including non-cash benefits such as travel, meals and entertainment. The practice of giving business gifts and taking part in corporate hospitality or undertaking speaking engagements varies between countries, regions and industries. What may be normal and acceptable in one may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable (both from the perspective of the provider and recipient) rather than lavish and extraordinary; bearing in mind that what may normally be viewed as small or insignificant in some countries can be of significant value in another. The intention behind the gift should always be considered and nothing should be explicitly or implicitly expected or demanded in return. The giving of gifts and corporate hospitality or entertainment is not prohibited, if the following requirements are met:
 - it is done in the normal course of the Company's business and without the intention of, or without a reasonable prospect of, influencing a third party to obtain or retain an improper business advantage, or to reward the provision or retention of an improper business advantage, or in explicit or implicit exchange for favors or benefits;

- it complies with U.S. and applicable local law;
 - it does not include cash or a cash equivalent;
 - it must be properly recorded and disclosed, and not paid personally to avoid any approval or disclosure requirements;
 - taking into account the reason for the gift or hospitality, it is of an appropriate type and value in the applicable country/region and given at an appropriate time;
 - it is given openly and in the Company's name, not secretly;
 - it is not given or received frequently between the same individuals; and
 - gifts or hospitality should not be offered to public officials or government representatives, or politicians or political parties, without the prior approval of the Company's General Counsel.
- Personal Use of Company Assets. Team members may not use Company assets, labor, or information for personal use, other than incidental personal use, unless approved by the Company.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. Please reference the Company's Global Anti-Corruption Policy, for further information. We also encourage you to seek guidance from your manager, human resources or inside legal counsel when you have any questions or doubts.

If you are aware of an actual or potential conflict of interest where your interests may conflict with the Company's interests, or are concerned that a conflict might develop, please discuss with your manager and then obtain approval from the General Counsel or their designee before engaging in that activity or accepting something of value. Please also note that you may be periodically required to provide information to our internal legal counsel about your related parties and potential conflicts of interest.

IV. Corporate Opportunities

Except as otherwise set forth in the Company's certificate of incorporation and bylaws, team members owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. Team members 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. More generally, team members are prohibited from using Company property, information or position for personal gain. Team members are further prohibited from competing with the Company directly or indirectly during their employment with the Company and as otherwise provided in any written agreement with the Company.

Sometimes the line between personal and company benefits is difficult to draw, and sometimes there are both personal and company benefits in certain activities. In such cases, team members should make sure that any use of Company property or services that is not solely for the benefit of the Company, is approved beforehand by the Company.

V. Protection of Assets, Confidentiality & Communications

All team members should endeavor to protect the Company's assets and ensure their efficient use. Any suspected incident of fraud or theft should be reported immediately to the team member's immediate supervisor or other appropriate Company personnel for investigation.

In carrying out the Company's business, team members may learn confidential or proprietary information about the Company, its customers, suppliers, or business partners. Confidential or proprietary information of the Company, and of other companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

Subject to the "Protected Activity Not Prohibited Section" below, team members must maintain the confidentiality of information about the Company and other companies entrusted to them 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.

The obligation to protect confidential information does not end when a team member leaves the Company. Any questions about whether information is confidential should be directed to the Company's internal legal counsel.

Subject to the "Protected Activity Not Prohibited Section" below, any team member who is contacted by a member of the financial community, the press, or any other outside organization or individual for a statement on behalf of the Company, should refer them to a member of the Company's communications team. Any questions on overall business trends, business in different geographies, pricing, suppliers, new products or technologies, and lawsuits or disputes or any other aspects of the Company's business should be referred to the Company's communications team.

VI. Fair Dealing

The Company has a history of succeeding through honest business competition. The Company does not seek competitive advantages through illegal or unethical business practices. Each team member should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors, and team members. No team member should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice. Any questions regarding such business practices should be directed to the Company's internal legal counsel.

VII. Compliance with Laws, Rules & Regulations

All team members must respect and obey all applicable laws when carrying out responsibilities on behalf of the Company and refrain from illegal conduct.

Team members have an obligation to be knowledgeable about specific laws, rules, and regulations that apply to their areas of responsibility. If a law conflicts with a policy in this Code, team members must comply with the law.

Any questions as to the applicability of any law should be directed to the Company's inside legal counsel. The following is a brief summary of certain topics about which team members should be aware:

A. Antitrust

Competition laws and regulations throughout the world are designed to foster a competitive marketplace and prohibit activities that restrain trade. Generally, actions taken in combination with other companies that restrain competition may violate the antitrust laws. Certain antitrust violations involving agreements with competitors are crimes and can result in large fines and prison terms for the individuals involved. In addition, actions taken by an individual company in market segments in which it has a particularly strong position may violate the antitrust laws if the actions have the effect of excluding competition through unfair means.

The Company is dedicated to compliance with laws governing fair competition in all of its activities. Any activity that undermines this commitment is unacceptable. The laws governing this area are complex, and team members should seek guidance from internal legal counsel before taking any action whenever appropriate.

B. Health, Safety & Environment

The Company works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. Compliance with all applicable laws, rules and regulations governing health, safety, and the environment are a responsibility of management and team members in all functions.

C. Fair Employment Practices

The Company strives to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.

The Company requires each team member to treat all colleagues in a respectful and professional manner and to forge working relationships that are uniformly free of bias, prejudice, and harassment. The Company prohibits discrimination against or harassment of any team member on the basis of race, caste or perceived caste, religion, or religious creed (including religious dress and grooming practices), color, sex (including pregnancy, childbirth breastfeeding, or related medical conditions), nationality, ethnic or national origin, ancestry, immigration status or citizenship, age, physical or mental disability, medical condition (including genetic information or characteristics, or those of a family member), military service or veteran status, marital status or family care status, sexual orientation, family medical leave, gender (including gender identity, gender expression, transgender status, or sexual stereotypes), political views or activity, status as a victim of domestic violence, sexual assault or stalking, or any other basis or classification protected by applicable federal, state or local law.

Any team member who is found to have discriminated against another team member is subject to discipline up to and including termination of employment or relationship with the Company.

No individual will suffer any reprisals or retaliation for making complaints or reporting any incidents of discrimination or perceived discrimination, or for participating in any investigation of incidents of discrimination or perceived discrimination. Additional information about the Company's equal employment and anti-discrimination and harassment policies can be found in the Company's Employee Handbook.

D. Political Activities

The Company does not make contributions to political candidates or political parties.

Team members engaging in political activity will do so as private citizens and not as representatives of the Company. A team member's personal lawful political contribution, or decision not to make contributions, will not influence the team member's compensation, job security or opportunities for advancement.

E. Foreign Corrupt Practices and Anti-Bribery Laws

Team members may only transact business on behalf of the Company in foreign markets and with foreign government officials in accordance with the Company's established policies regarding foreign corrupt practices and/or any applicable law, including the United States Foreign Corrupt Practices Act ("FCPA") and the United Kingdom Bribery Act of 2010, the United States Travel Act and Title 18 of the United States Code section 201. Team members must never engage in any bribery, kickbacks or other types of corruption when dealing with customers, suppliers or other third parties regardless of local practices or competitive intensity. Specifically, team members must never directly or indirectly via a third party make or provide a payment (including cash or any other items of value such as meals, gifts, travel, entertainment, etc.) to a foreign official or government employee to corruptly influence the foreign official or government employee, obtain or retain business for the Company or to acquire any improper advantage.

If a team member is unaware of the legal rules involving these activities, he or she should consult with the Company's inside legal counsel before taking any such action. For more information about the FCPA and the rules governing providing things of value to foreign officials, please reference our Global Anti-Corruption Policy, which can be found on the Company's internal website, or contact our internal legal counsel.

IX. Compliance & Reporting

A. Seeking Guidance

Team members are encouraged to seek guidance from their managers, the Company's human resources team, the Company's internal legal counsel, or other appropriate Company personnel when in doubt about the best course of action to take in a particular situation. In most instances, questions regarding the Code should be brought to the attention of the Company's internal legal counsel.

B. Reporting Violations

If a team member knows of or suspects a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), he or she must report it immediately to the Company's internal legal counsel. See the See Something Say Something Policy for information about making anonymous reports.

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law. The Company does not permit retaliation of any kind for good faith reports of violations or possible violations.

C. Investigations

Reported violations will be promptly and thoroughly investigated. It is imperative that the person reporting the violation not conduct an investigation on his or her own. Team members are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Team members should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, you are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or 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.

D. Sanctions

Team members who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, team members or officers who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the board.

Furthermore, violations of some provisions of this Code are illegal and may subject the team member, officer or director to civil and criminal liability.

E. Disclosure

Nothing contained in this Code or any other Company agreement or policy is intended to prohibit or restrict you from disclosing confidential information to any applicable government, regulatory or self-regulatory agency including under Section 21F of the Securities and Exchange Act of 1934, as amended, and the rules thereunder.

X. Waivers of this Code

Any amendment or waiver of any provision of this Code must be approved in writing by the Board or, if appropriate, its delegate(s), and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of the

Code for a Senior Financial Officer will be promptly disclosed to stockholders if and as required by applicable law or the rules of the applicable stock exchange.

XI. Amendment

The Company is continuously reviewing and updating its policies, and therefore reserves the right to amend this Code at any time for any reason.

XII. Protected Activity Not Prohibited

Nothing in this Code limits or prohibits team members from engaging for a lawful purpose in any “Protected Activity.” “Protected Activity” includes: (i) filing and/or pursuing a charge, complaint, or report with, or otherwise communicating, cooperating, or participating in any investigation or proceeding that may be conducted by any federal, state or local government agency or commission, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission, the Occupational Safety and Health Administration, and the National Labor Relations Board (“Government Agencies”); and/or (ii) discussing or disclosing information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that team member has reason to believe is unlawful. In connection with such Protected Activity, team members are permitted to disclose documents or other information as permitted by law, without giving notice to, or receiving authorization from, the Company. Notwithstanding the foregoing, team members are required to take all reasonable precautions to prevent any unauthorized use or disclosure of any Company trade secrets, proprietary information, or confidential information that does not involve unlawful acts in the workplace or the activity otherwise protected herein. Protected Activity does not include the disclosure of any Company attorney-client privileged communications or attorney work product. Any language in this Code or any other document regarding team members’ right to engage in Protected Activity that conflicts with, or is contrary to, this section is superseded by this Code. In addition, pursuant to the Defend Trade Secrets Act of 2016, an individual will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (i) is made in confidence to a federal, state, or local government official (directly or indirectly) or to an attorney *solely* for the purpose of reporting or investigating a suspected violation of law, or (ii) is made in a complaint or other document filed in a lawsuit or other proceeding, if (and only if) such filing is made under seal. In addition, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual’s attorney and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order. Finally, nothing in this Code constitutes a waiver of any rights team members may have under the Sarbanes-Oxley Act or Section 7 of the National Labor Relations Act (“NLRA”). For purposes of clarity, nothing in this Code shall be interpreted to impair or limit any team member’s participation in any legally protected activities, such as (i) forming, joining, or supporting labor unions, (ii) bargaining collectively through representatives of team members’ choosing, (iii) discussing wages, benefits, or terms and conditions of employment, and (iv) discussing, or raising complaints about, working conditions for the purpose of mutual aid or protection of such team member or the Company’s other current or former team members, to the extent such activities are protected by Section 7 of the NLRA.

XIII. Acknowledgment

All new team members must sign an acknowledgment form confirming that they have read this Code and that they understand and agree to comply with its provisions. Signed acknowledgment forms will be kept in team member personnel files. Failure to read this Code or to sign an acknowledgement form does not excuse any person from the terms of this Code.