

Our Code of Conduct

2021



A Message from Whitney

Since day one, Bumble has worked to create spaces where people can meet each other in healthy, safe, and comfortable ways. Everyone at Bumble plays a vital role in that mission, which includes a commitment to doing business the right way.

What we do as a company matters. But how we achieve our goals matters just as much.

Our Code of Conduct is a guide for aligning our actions and decisions with our values and for making sure our business stays ethical and legal. At its core, the message is simple: act with integrity and speak up when you suspect we're not living up to that mark. When we do that, our business will thrive and we will earn the trust of our colleagues, user base, investors, and communities.



Join me in reading our Code and keeping it on hand to tackle tough questions and situations. And thank you for upholding our commitment to doing what's right.

Whitney Wolfe Herd

CEO and Founder

Contents

Our Culture 4

- Our Mission 5
- Our People, Culture, and Values 5
- Our Code 6
- Our Responsibilities 6
- Special Responsibilities of Managers 7

How Our Code Helps Us Live Our Values 8

- To Whom Does Our Code Apply? 9
- What Happens If I Don't Comply? 9
- How Do I Ask Questions and Raise Concerns? 10

Doing Right by Our Team 13

- Respectful Workplace 14
- Diversity, Equity, and Inclusion 14
- Health, Safety, and Security 15

Doing Right by Our Customers 17

- Bribery and Corruption 18
- Anti-Money Laundering and Trade Sanctions 19
- Fair Competition 21
- Suppliers and Other Third Parties 22

Doing Right by Bumble 23

- Accurate Records 24
- Privacy and Data Protection 25
- Confidential and Proprietary Information 26
- Protecting Our Intellectual Property and That of Others 27
- Company Assets 29
- Financial Integrity 29
- Information and Communications Systems 30
- Conflicts of Interest 32
- Gifts and Entertainment 33
- Family and Friends 34
- Insider Trading and Fair Disclosure 35
- External Media Inquiries 38
- Social Media 39

Doing Right by Our World 40

- Environment and Sustainability 41
- Human Rights 41
- The Political Process 42
- Giving Back 43

Living Our Values, Following Our Code 45

Additional Resources for Seeking Help and Speaking Up 46

Our Culture

Our Mission

Bumble is a supportive, inclusive connections platform where people can meet each other in a comfortable, equal, healthy way.

Our People, Culture, and Values

Bumble is committed to upholding a set of values as we work collectively to achieve our mission and promote connection and community.

Our core values for our platform are as follows, and we expect the same from our team:

- **Growth:** Our collective priority is driving growth and delivering meaningful value to our users, our business, and our teammates by embracing challenges, taking risks, and using learnings to go after ever greater opportunities.
- **Make the first move:** We take initiative to advance the mission and the business, moving quickly and with focus, rigor, and intent.
- **Honesty:** We foster constructive and respectful honesty on our platforms and our teams, operating with directness and the intention of raising the bar for all.
- **Kindness:** We create environments where kindness and respect are paramount, both in our products and in our culture.
- **Accountability:** We all take ownership of our objectives and our roles in advancing the mission and growing the business. And we all take responsibility for the safety and well-being of our Bumble and Badoo communities.
- **Inclusivity:** We are a global company and embrace differing perspectives and the opportunity to collaborate with teammates of diverse backgrounds, beliefs, and cultures, bringing others along in pursuit of our goals.

Our Code

At Bumble, we understand healthy, positive relationships require a supportive, inclusive platform. Our Code is a guide for us to build this same safe, inclusive, and healthy environment for our company.

Everything we do at Bumble should support our mission. Sometimes the actions and decisions we should take are clear. Sometimes the right call is harder to determine.

Our Code serves as a guide for those unclear situations. It's a guide to help us live our mission every day, with every action we take.

Our Code helps make sure our actions are ethical and legal. Beyond that, it helps us do what's right for our employees, our user base, our stockholders, and our communities.

While our Code cannot address every situation you might face at work, you can use it as a guide to choosing the best course of action. You can find additional guidance in Bumble's policies, handbooks, and guidelines.

Our Responsibilities

At Bumble, we are expected to:

- Live our values as we pursue our mission.
- Read, understand, and follow our Code.
- Seek help when we're unsure of the right thing to do.
- Speak up about concerns and misconduct.

Special Responsibilities of Managers

Managers have additional responsibilities. We expect managers to:

- Make sure your teams understand and follow the Code.
- Be role models of ethical behavior.
- Make it clear that we never compromise our ethics to achieve business results.
- Take every report of misconduct seriously.
- Follow up to ensure issues are handled appropriately.
- Ensure that no one on your team is retaliated against for speaking up or cooperating with an investigation.

How Our Code Helps Us Live Our Values

To Whom Does Our Code Apply?

Every one of us must comply with our Code of Conduct no matter our location or position. We also have policies and regulations that hold us to our standards. Bumble's board of directors has adopted the Code, and it applies to every director, officer, and employee of Bumble Inc. and its subsidiaries (collectively, "Bumble"), as well as third parties acting on our behalf. In the case of Bumble's non-employee directors, compliance with this Code is subject to the provisions of Bumble's amended and restated certificate of incorporation, amended and restated bylaws, and any stockholders agreement with Bumble.

Waivers

In rare cases, strict application of the Code may cause significant hardship. In those situations, a waiver of the Code may be requested. Consult with your team's People & Culture business partner, Legal representative, or the Chief Legal and Compliance Officer if you believe you need a waiver. Waivers for executive officers or directors may be granted only by the Board of Directors and must be promptly disclosed to stockholders.

What Happens If I Don't Comply?

Failing to follow our Code damages our reputation and threatens the strength of our teams and our relationships with our users, investors, and communities.

We take violations seriously and we thoroughly investigate all instances of noncompliance. There are consequences for not following the guidance in our Code and policies, and in some cases a violation could also subject Bumble or individuals to civil and/or criminal penalties. Misconduct that may result in disciplinary action includes:

- Violating our Code or asking others to violate the Code.
- Failing to report a known or suspected violation of our Code.
- Refusing to participate in an investigation or knowingly providing false or incomplete information.
- Retaliating against another employee for reporting in good faith or participating in an investigation.

How Do I Ask Questions and Raise Concerns?

Living our values requires that we speak up when we have questions or concerns. If you see something that gives you pause or may violate what we stand for, *speak up!*

If a situation seems to violate our Code, we want to know about it. It makes us a better company—for those who work here, for everyone who uses our apps, and for our many stakeholders. We protect Bumble's reputation when we identify and resolve problems as early as possible.

If you have a question or a concern, bring it to:

- Managers and supervisors
- Team leaders
- People & Culture
- Legal

You may submit anonymous reports through the Bumble Ethics Hotline. The Hotline is available 24 hours a day, 7 days a week at <https://bumble.ethicspoint.com>.

For more ways to raise concerns, see the [Additional Resources for Seeking Help and Speaking Up](#) at the end of this Code.

Anonymity and Confidentiality

At Bumble, we thrive on honesty and candor. We want you to speak up about concerns so we can discuss them openly. Bumble will make every reasonable effort to protect the identity of those involved in reports and investigations. Bumble does not allow retaliation against anyone who makes a report in good faith.

Reports can be made anonymously to the extent permitted by laws and regulations. If you wish to remain anonymous, do not provide your name or other identifying information when submitting your concern through the Bumble Ethics Hotline.

Please provide as much detail as possible in your report so we can fully investigate your concern. Information such as location, individuals, transactions, events, and dates involved promote a more efficient investigation. Bumble may report activity that involves potential criminal or illegal activities to the appropriate authorities.

Retaliation? Not Here.

We want to create an inclusive, safe, and healthy environment. All of us should feel comfortable reporting concerns. This commitment means Bumble prohibits any form of retaliation. If you raise a concern within our company, or cooperate in an investigation, you will not face negative consequences if your intentions are good.

Anyone who practices retaliation at Bumble will, however, face disciplinary action, including termination of employment or possible legal action.

Investigations

If there is a concern that warrants an investigation, we all must cooperate fully. If an investigation uncovers misconduct, disciplinary action may be taken against responsible parties.

How We Make the Right Decisions

We work in a fast-paced environment, where we pride ourselves on rising to the challenge of getting things done with pace. But there will be moments for all of us when we encounter situations that require us to evaluate the right thing to do. In times like these, what should we do?

In most cases, your best bet is to talk to your manager first. Together you can use this decision-making model to answer questions that might arise in these situations.



If you answered No or are not sure about the answers to any of the questions in this decision-making guide, your next step is to seek more help. Remember, if you have a question or concern, raise it with a manager or supervisor, team leader, your People & Culture representative, or Legal, or use the Bumble Ethics Hotline.

Doing Right by Our Team

Respectful Workplace

At Bumble, we build a supportive, inclusive environment for our users. We do the same for everyone who works alongside us.

Why We Do What's Right

Respect underlines our commitment to build a safe, inclusive, and healthy company. When our teams feel valued and secure, we do our best work. Everyone deserves to be treated with dignity and respect and to work in a supportive environment free from harassment.

How We Live Our Code

We ensure that our workplace is respectful and safe when we:

- Always treat each other with dignity and courtesy.
- Avoid saying or doing anything that may be offensive or degrading. When in doubt, we can't go wrong by erring on the side of courtesy.
- Speak up if we witness harassing or offensive behavior.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Diversity, Equity, and Inclusion

We are at our most creative and make the best decisions when we draw on diverse talents and perspectives. We're committed to attracting, developing, and promoting our people based on merit and fair treatment.

Why We Do What's Right

When everyone feels able and comfortable to participate and contribute, we make better decisions, tackle challenges more creatively, and innovate more effectively to achieve our goals. At Bumble, kindness and inclusivity are at the core of what we offer and who we are. We strive to attract and value our people for the great variety of talents, backgrounds, and perspectives they bring.

How We Live Our Code

We promote diversity, equity, and inclusion when we:

- Build our teams with diversity in mind.
- Seek input from all of our team members.
- Welcome different points of view to find solutions.
- Accommodate individuals with legally recognized disabilities.
- Do not discriminate based on any protected characteristics such as race, color, religion, national origin, sex, pregnancy, age, disability, sexual orientation, gender identity, marital status, military service, or any other status protected by law.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Health, Safety, and Security

We all take responsibility for keeping ourselves and each other safe, secure, and healthy in the workplace.

Why We Do What's Right

Nothing is more important than keeping everyone safe, secure, and healthy. We have a shared responsibility to pay attention to potential

safety issues, to know procedures, and to speak up if something seems unsafe.

How We Live Our Code

We promote health, safety, and security when we:

- Watch out for each other to avoid unsafe conditions or behaviors.
- Report any unhealthy or unsafe conditions or behaviors, especially workplace hazards, broken or missing equipment, or the presence of weapons on Bumble property.
- Know what to do in case of injury or other workplace emergencies and crises.
- Cooperate during emergency drills.
- Never bring illegal drugs or other controlled substances onto Bumble property or be under their influence while at work.
- Try to talk through disagreements calmly before they escalate.
- Report any threats of violence we experience or witness (including outside of work and on social media).
- Call law enforcement in the case of imminent danger.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Doing Right by Our Customers

Bribery and Corruption

We grow and retain business on the strength of what we offer and by building relationships based on transparency and trust – never by offering or accepting any improper incentives.

Why We Do What's Right

We believe in winning business through the confidence and trust that our people, products, and services inspire, and the superior value we provide. Corruption has no place in our business, and we do not tolerate it in any form, anywhere we operate. It harms communities, puts our company and reputation at risk, and—because it is illegal almost everywhere—can result in substantial fines and even prison time for the individuals involved.

Furthermore, as a global company, we must comply with the laws of multiple countries that prohibit receiving, offering, providing, or authorizing the payment of bribes or corrupt benefits of any kind. These include the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, which apply to our operations around the world, regardless of location or local practices.

How We Live Our Code

We prevent bribery and other forms of corruption when we:

- Never offer, promise, or give anything of value directly or indirectly to a government official or anyone else for an improper business advantage.
- Never offer or accept bribes, kickbacks, or facilitation (also known as “grease”) payments.
- Keep accurate and complete records so all payments are honestly and accurately described and Bumble funds are not used for unlawful purposes.
- Never use an agent or other third party to make payments or undertake activities that we cannot do ourselves.

- Avoid unwittingly participating in corruption schemes by being on the lookout for red flags and using only reputable business partners vetted through our due diligence review process.
- Follow Bumble policies related to giving and receiving gifts and entertainment (see [Gifts and Entertainment](#) for more information).

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact Legal.

Anti-Money Laundering and Trade Sanctions

We are committed to complying fully with all anti-money laundering and anti-terrorism financing laws throughout the world. We are vigilant about preventing the use of Bumble products, services, and technology for money laundering or terrorist financing.

We are committed to complying fully with all applicable laws that govern international trade, and we guard against the use of our products and services by individuals and entities targeted for sanctions, including export restrictions.

Why We Do What's Right

Money laundering and terrorist financing are serious crimes. Money laundering is a process by which criminal funds are “cleaned” by making it appear that the money comes from legitimate sources or transactions. Terrorist financing provides funding to individuals associated with a terrorist organization or terrorist activities, regardless of whether the source of funds is legitimate. Despite our commitment to following the law at all times, even the claim that Bumble has been a conduit for illegal funds would cause serious damage to Bumble's reputation.

We operate on a global basis and are therefore subject to laws governing international trade, which are complex and vary from one jurisdiction to another. These laws can affect our ability to operate in different regions. Many countries periodically impose restrictions on exports and other dealings with certain countries, persons, or groups. These restrictions can include prohibitions on commercial dealings with sanctions targets, travel bans, freezing of assets, bans on funds transfers, and restrictions on exports of certain goods, services, and technology. Violations of these laws can result in severe fines, revocation of permits, or even imprisonment.

By complying fully with all anti-money laundering and anti-terrorism financing laws, as well as all applicable laws that govern international trade, we not only protect Bumble but we also make the world a safer place.

How We Live Our Code

We prevent money laundering and terrorism financing and comply with government-imposed trade sanctions and export restrictions when we:

- Avoid any activity that conceals or disguises the nature, location, source, ownership, or control of funds.
- Ensure that we are conducting business only with reputable business partners, for legitimate business purposes, with funds derived from legitimate sources.
- Remain alert to possible money laundering, terrorist financing, or activity violating any applicable trade sanctions or export-based restrictions.
- Reach out to Legal with any questions to ensure that our global trade activities comply with all applicable laws.

Where Can I Learn More?

If you have a question, or if you know or suspect that someone is using Bumble's products or systems for money laundering, terrorist financing, or in violation of trade sanctions or export-based restrictions, contact Legal or use the Bumble Ethics Hotline.

Fair Competition

We compete energetically and honestly for business. We succeed on the strength of transformative ideas and technology that bring value to our users – and never through inappropriate conduct in the marketplace.

Why We Do What's Right

We welcome strong competition because it keeps us honest and on top of our game. Bumble's users come to us – and stay with us – because they trust us to support their search for meaningful relationships. Innovating for their success is what ensures our own success – it protects our reputation and competitive advantage.

The laws designed to maintain free and fair competition – known as antitrust laws in the United States and competition laws in most other places – are complicated. They can also vary by state or country. These laws determine how companies can compete and interact with each other.

How We Live Our Code

When it comes to our competitors, we:

- Never discuss profit models or key strategic plans with them.
- Immediately report any attempts by competitors to have improper discussions or make illegal agreements to Legal.
- Avoid making false claims or negative comments about competitors' products and services.
- Avoid using intellectual property rights of competitors.

When it comes to our business partners, we:

- Never accept bribes or kickbacks.
- Deal fairly with all parties, avoiding any false or dishonest practices.
- Always behave professionally during negotiations, treating everyone with respect.

Suppliers and Other Third Parties

We choose business partners who share our commitment to the highest ethical standards, while also ensuring the best value for Bumble.

Why We Do What's Right

Our reputation depends on our ability to create apps that live up to our values of accountability, inclusion, and respect. We count on reliable partners that we trust to provide the support we need and at a fair price.

How We Live Our Code

When it comes to working with or selecting our partners, we ensure the best results when we:

- Treat all of our suppliers and business partners fairly and with integrity, regardless of the value of the transaction or the length of the relationship.
- Choose suppliers who best meet our business needs and objectives, while also making sure they share our values.
- Carry out due diligence on suppliers.
- Base our decisions on objective criteria, such as quality, price, service, reliability, availability, technical excellence, and delivery, as well as ethical business practices.
- Avoid conflicts of interest – and even the appearance of conflicts of interest – which could call into question our independent judgment on Bumble's behalf (see [Conflicts of Interest](#) for more information).
- Avoid inappropriate gifts and entertainment or any other kind of favoritism that might compromise the selection of the best partners.

Doing Right by Bumble

Accurate Records

We maintain complete and accurate records so that we can make responsible business decisions and provide full, fair, accurate, timely, and understandable disclosure in reports and documents Bumble submits to the Securities and Exchange Commission and other government agencies and in other public communications.

Why We Do What's Right

Bumble depends on proper records for making strategic and informed decisions, building trust with stockholders and users, and complying with and enforcing the law. As a public company, securities laws require Bumble to maintain our records accurately and to disclose full information about our business and financial performance in a timely manner.

How We Live Our Code

We maintain the integrity of our books and records by:

- Complying with generally accepted accounting principles, internal controls, and all relevant laws and regulations.
- Recording all assets, liabilities, revenues, expenses, and business transactions completely, accurately, in the proper period, and in a timely manner.
- Ensuring that records are submitted to internal and external auditors promptly and accurately.
- Never misleading or misinforming anyone about our business operations or finances.
- Reporting any concern that a record is inaccurate, false, or misleading to the Audit Committee.
- Identifying, maintaining, safeguarding, and disposing of records in accordance with Bumble's records retention schedule.
- Ensuring records are easily accessible and maintained in an organized and secure environment.

- Never selectively editing or discarding records that have not met their retention requirements, nor directing anyone else to do so.
- Retaining and providing complete and accurate records promptly if they are requested in connection with a legal hold, audit, or investigation.

Privacy and Data Protection

Protecting data is fundamental to our mission of creating a platform — and company — where people feel safe and comfortable. We safeguard the privacy, confidentiality, and security of our users' and employees' data.

Why We Do What's Right

Earning and keeping the trust of our users and stakeholders is essential to maintaining our reputation and sustaining our growth.

We want our users and coworkers to know they can rely on all of us at Bumble to look after their interests. This includes taking precautions to protect any data or confidential information that our users, employees, and partners share with us in the course of business.

How We Live Our Code

We protect privacy when we:

- Comply with all privacy and data protection laws that apply to us.
- Adhere to the terms of our privacy policies.
- Collect, process, and store data lawfully, fairly, and in a transparent manner.
- Implement appropriate measures and safeguards to protect the confidentiality and integrity of data.
- Carry out thorough due diligence on partners to ensure they adhere to the same high standards.
- Consider the privacy risks involved with any new use of data.

- Immediately notify the data protection officer or information security officer of any known or suspected data loss incidents.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Confidential and Proprietary Information

Our confidential business information and intellectual property are vital business assets that distinguish us from competitors. We must protect them from unauthorized disclosure or misuse.

Why We Do What's Right

Continued success in developing new products and services, attracting new users, and maintaining our competitive advantage depends on protecting Bumble's confidential information, knowledge, and intellectual property.

How We Live Our Code

We protect Bumble's confidential and proprietary information when we:

- Share confidential and proprietary information only with team members and third parties acting on our behalf who are authorized and have a legitimate business need to access it.
- Secure documents, data, and devices with effective physical measures, as well as passwords and encryption in line with our information security standards.
- Enter into confidentiality agreements with third parties before disclosing proprietary information.
- Do not discuss confidential matters in public places, such as elevators, airplanes, restaurants, and co-working spaces.

- Do not make confidential information potentially visible to others (such as working on a laptop during a flight or accessing an unsecured Wi-Fi network).
- Ensure that only authorized people access Bumble facilities.
- Escort all visitors to our offices and not allow them to enter restricted areas.
- Report any possible breaches so they can be promptly and properly addressed.

Nothing in this Code prohibits you from making disclosures to the government pursuant to applicable whistleblower laws.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Protecting Our Intellectual Property and That of Others

Here at Bumble we're all about creativity and innovation. Our teams are creating new content every day. The ideas, information, and knowledge that come about as a result of our creativity and innovation are known as Intellectual Property (IP), and Intellectual Property Rights (IPRs) are the legal rights which protect IP.

Why We Do What's Right

The IPRs that we've built up at Bumble are fundamental to the success of our business.

Similarly, because we know the business value of our own IP, we respect what others own by never copying or using others' protected works. It is unethical, against the law, and could create financial and legal liability for Bumble.

How We Live Our Code

We protect Bumble when we:

- Keep our IPRs safe and secure. IPRs should not be disclosed, except with explicit consent from IP Legal where required for business operations.
- Provide Bumble with full details of any IPRs that we create during our employment and where required, provide any supporting documents that relate to those IPRs.
- Ensure all third parties creating IPRs on Bumble's behalf do so only in line with agreements reviewed by Legal.
- Work with IP Legal to ensure we have the right to use assets (e.g., names, slogans, logos, images, videos, music, fonts, or software) and that they do not infringe the rights of others.
- Use third-party assets such as videos, images, music, and software only according to the terms of our licenses for business use as advised by IP Legal.
- Remember that all IPRs created are owned by the business and written consent is necessary for any external use (e.g., publishing open source software, presenting at conferences and other speaking opportunities, and collaborating outside of the business).
- Follow all Bumble policies, guidelines, and procedures related to IPR creation and use.
- Respect third-party IPRs and act fairly and honestly at all times.

Company Assets

We take care of Bumble's assets because they are the building blocks for our future, helping us better serve our users and create value for our stockholders.

Why We Do What's Right

Bumble's assets are the result of hard work by all of our employees, past and present. Our profitability and sustainable growth over the long term require that we protect and use our assets wisely.

How We Live Our Code

We preserve the value of our physical, information, intangible, and financial assets when we:

- Take all reasonable steps to ensure that Bumble assets are not damaged, abused, wasted, lost, or stolen.
- Demonstrate good judgment in using information and communications systems, and the electronic data they store, process, or transmit.
- Always handle company funds honestly, responsibly, and in accordance with Bumble policies.
- Report any abuse or misuse of Bumble assets to People & Culture, Legal, or the Bumble Ethics Hotline.

Financial Integrity

We understand and respect the need to follow Bumble's internal controls, which are designed to promote efficiency, ensure reliable financial reporting, and help us comply with the law.

Why We Do What's Right

Internal controls and procedures are in place to protect Bumble, our stockholders, our users, and others. They have been established to reduce risks to our business, and especially to prevent fraud, uncover and minimize errors, promote operating efficiency, and achieve compliance with our policies and the law.

How We Live Our Code

We maintain our financial integrity when we:

- Operate within the framework of whatever internal controls apply to our particular jobs.
- Never bypass an internal control, even if doing so might appear harmless or could save time.
- Report any concerns immediately to the Audit Committee, Finance, Legal, or the Bumble Ethics Hotline, especially if we become aware that an internal control or procedure has been bypassed or overridden.

Information and Communications Systems

Our information and communications systems and devices are intended to help us achieve our business goals, and we must use and protect them responsibly.

Why We Do What's Right

Bumble's information and communications systems and devices are valuable assets that help us execute our strategies. It is important to recognize the sensitivity and value of the information being processed, transmitted, or stored by these systems and devices.

Company systems and devices are provided for business use. Occasionally, some personal use is necessary, and this is allowed as long as it's reasonable, limited, and incidental.

To further protect these resources, Bumble reserves the right to monitor their use, where permitted by local law. This right extends to personal devices when Bumble business is conducted on them. For that reason, we should use company-issued devices and official communication channels for our work as much as possible. Bumble will not search a company or personal device without a reasonable cause, but if personal devices are used to exchange work communications, they are subject to search for legitimate causes such as investigations or lawsuits.

How We Live Our Code

We use our information and communications technology responsibly when we:

- Comply with our information security policies.
- As a best practice, conduct work on Bumble-issued devices and via company-approved channels rather than on personal devices.
- Avoid using text messages on personal phones to conduct official Bumble business.
- Ensure that only authorized users have access to Bumble's computers and network services.
- Provide authorized users with access only to the systems and data needed to do their jobs.
- Keep computer equipment safe and secure at all times whether on or off Bumble premises.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Conflicts of Interest

We put Bumble's goals and the interests of our users before personal gain because this helps us make unbiased, smart decisions that benefit our business.

Why We Do What's Right

We make objective decisions free from personal bias because they lead to better outcomes for Bumble and our user base. Using good judgment to make the best choices for our business allows us to innovate and pursue our goals without distraction or divided loyalty. It also demonstrates to others that we are responsible and trustworthy.

A conflict of interest exists whenever personal interests, activities, or investments of Bumble team members may be inconsistent with the responsibilities of their employment or position.

Even the appearance of a conflict of interest can leave others thinking we are acting improperly. Fortunately, most conflicts of interest can be avoided or addressed if promptly disclosed and managed correctly. While the following guidance cannot cover every situation, it does address some of the more common conflicts of interest.

How We Live Our Code

We put Bumble's best interests before our own when we:

- Remain alert for situations in which our personal activities or relationships could interfere with our objectivity.
- Disclose to a manager or Legal any situation in which we believe there may be a conflict between our personal interest and the interests of our company.
- Promptly disclose to a manager or supervisor any romantic relationships that arise with others in the workplace so that we may consider whether a shift in organizational structure is appropriate.

- Avoid putting ourselves in situations involving family or friends in which even the appearance of impropriety could exist.
- Do not take personal advantage of business opportunities that we discover in the course of our work, recognizing that they belong to Bumble.
- Ensure that outside jobs or other activities don't hinder our responsibilities or contributions to Bumble.

Gifts and Entertainment

We look for opportunities to build and strengthen business relationships, but we will never offer or accept inappropriate gifts and entertainment to influence business decisions.

Why We Do What's Right

In certain settings, it may be customary and appropriate to provide or receive business courtesies, such as reasonable entertainment and modest gifts. We must never allow such courtesies to affect our ability to make objective business decisions, or to create the appearance that our objectivity has been compromised.

How We Live Our Code

Any gift we offer must:

- Be for a proper business purpose.
- Be legal and accurately documented.
- Be permitted by Bumble policies.
- Be permitted by the recipient's policies.
- Be reasonable in value and appropriate under the circumstances.
- Not be cash, gift certificates, gift cards, or other cash equivalents.
- Not be intended to secure an improper advantage or otherwise influence the recipient inappropriately.

Additionally, we:

- Never ask for gifts.
- Do not accept cash, gift cards, or cash equivalents.
- Accept gifts or hospitality only that are nominal in value and given on an infrequent basis.
- Do not accept any gifts or hospitality from vendors if we are a member of the team evaluating a procurement in which the vendor is competing.

Government Employees and Agencies

Complex rules apply to the giving of gifts, entertainment, and other business courtesies to government officials, including employees of state-owned organizations. What may be permissible for commercial customers may be illegal when dealing with the government. Bear in mind that it isn't always obvious who is a government employee.

Given the risks to our business of not following the rules on gifts and government employees, it is important to seek guidance ahead of time from Legal.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Family and Friends

We avoid putting ourselves in situations in which our loyalties to friends or family could improperly influence our judgment.

Why We Do What's Right

We ensure that personal and family investments do not get in the way of our decisions on behalf of Bumble.

How We Live Our Code

We prevent actual or apparent conflicts of interest when we:

- Ensure that a close relative or close personal friend is not placed in a reporting relationship to us.
- Do not participate in hiring a person or business partner with whom we have a close personal or family relationship.
- Do not take or hold a personal financial interest in any transaction in which we know Bumble is or may be interested.
- Do not make an undisclosed investment or hold an undisclosed financial interest in a supplier, customer, or competitor (except for ownership of less than five percent of the shares in a publicly traded company or shares owned through a mutual fund).
- Disclose to Legal any significant stock holdings of publicly traded companies, especially those in the social networking area.

Insider Trading and Fair Disclosure

We never buy or sell securities in Bumble or any other company while in possession of material non-public information or share material, non-public information about Bumble or any other company in connection with buying or selling stock or other securities, which is known as “insider trading” and is illegal. We also must maintain the confidentiality of the sensitive information entrusted to us by Bumble and others with whom we do business.

Why We Do What’s Right

In the course of our jobs, we may have access to information that is not known to the public. Whether such information belongs to Bumble or another entity, we’re careful to preserve our reputation as a company that can be relied on to protect information entrusted to us.

Material, non-public information is information known to us but that has not been widely disseminated to the public, and which a reasonable

investor would consider important in deciding whether to buy or sell securities.

Some examples of material information may include:

- Earnings and financial results
- Budgets and planning documents
- News about significant mergers, acquisitions, divestitures, arrangements with distributors, or other commercial transactions
- Major litigation
- Developments regarding Bumble's material intellectual property
- Significant product or partnership developments
- Senior management developments

Insider trading occurs when an individual buys or sells securities while aware of material, non-public information related to those securities or shares material, non-public information with someone else who then buys or sells securities to which such information relates.

Insider trading is a serious crime, punishable by heavy fines and even imprisonment. Our success in the marketplace requires the trust and confidence of the investment community. Sustaining this trust requires that we act with integrity when trading public securities and follow federal and state securities laws.

Bumble is also subject to rules and regulations that prohibit the disclosure of material information to securities analysts and other market professionals before making it available to the public. These rules and regulations require publicly traded companies to previously or simultaneously make public any material, non-public information (oral or written) that a company discloses to the financial community and to shareholders. Bumble may not communicate material, non-public information selectively to analysts or shareholders.

How We Live Our Code

We can help prevent insider trading and market abuse by:

- Never buying, selling, or otherwise dealing with stock or other securities of Bumble or any other publicly traded company when in possession of material, non-public information.
- Not disclosing material, non-public information to anyone outside Bumble, including family members, relatives, or friends.
- Sharing material, non-public information, including with fellow team members, only on a need-to-know basis.
- Not engaging in “tipping,” which means directly or indirectly passing along material, non-public information about any company to anyone who may trade while aware of such information.
- Never assisting investors or securities analysts with information about Bumble, its competitors, or the industry except if that is clearly part of your job.
- Acknowledging that only certain persons specified in the Policy and Procedures for Compliance with Regulation FD are authorized to communicate information concerning Bumble to investors, securities analysts, and other market professionals.

Certain officers of Bumble, its directors, and certain other employees are subject to certain restrictions on trading Bumble securities, including trading windows or required pre-approval, as set forth in our Securities Trading Policy. If these trading restrictions apply to you, you will be notified and you will receive additional information regarding the restrictions on trading that apply to you.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact Legal.

External Media Inquiries

At Bumble, we speak with one voice when communicating with the media, financial analysts, investors, and the general public.

Why We Do What's Right

Our customers, investors, and communities deserve accurate, complete, and clear information about Bumble. We should present our company in a positive light while always being truthful.

Certain designated colleagues who are specially trained are authorized to speak on behalf of Bumble. By directing all media inquiries to those who are best prepared to deal with them, we prevent misinformation or errors from being released to the public.

How We Live Our Code

If we are contacted with questions or requests from outside Bumble and are not authorized to respond to them, we protect our reputation when we:

- Respond politely and professionally that we are not authorized to assist, but will put the person in touch with someone who can.
- Refer all external inquiries, as appropriate, to Global Communications by email at press@team.bumble.com.
- Never share our opinion or divulge information about Bumble, our users, or our business partners.
- Do not speak directly to investors, securities analysts, or other market professionals on behalf of or about our company unless authorized by the Policy and Procedures for Compliance with Regulation FD.
- Advise Corporate Communications before accepting an invitation to give a speech, interview, or presentation (members of the Board of Directors may contact Bumble's Corporate Secretary with any questions), and distinguish our personal views from those of Bumble when speaking in public or at industry forums.

- Ensure that any presentations do not include financial information about Bumble unless such material is approved by Legal or Finance.

Social Media

We embrace the power of social media to build connections and express our points of view while always taking care not to share information or opinions that could hurt Bumble's reputation.

Why We Do What's Right

We hold our users to standards of kindness and propriety with their profiles – and we should hold ourselves to no less than that standard. Online exchanges can have both positive and negative impacts and can be taken out of context, distorted, or misunderstood. When following good posting practices, we can keep our messaging clear and positive.

How We Live Our Code

We protect and build our brand when we:

- Take care to use our time on social media responsibly so that it doesn't interfere with work commitments.
- Never make disparaging remarks or represent our personal views as those of Bumble.
- Clearly distinguish between personal posts and those officially authorized by Bumble.
- Identify ourselves as Bumble employees if authorized to endorse our company, products, or services.
- Never disclose the confidential, proprietary, or financial information of Bumble, our users, business partners, or competitors.

Doing Right by Our World

Environment and Sustainability

At Bumble, we minimize our impact by supporting sustainable and environmentally responsible practices.

Why We Do What's Right

We are committed to leadership in environmental responsibility. This means reducing the environmental impact of our operations at every level and looking for opportunities to work with partners that share our vision of a sustainable future. Each of us has a role to play in maintaining this commitment.

How We Live Our Code

We contribute to Bumble's sustainable practices when we:

- Follow all applicable environmental laws and Bumble policies.
- Follow Bumble's plans and procedures for waste management and recycling.
- Take small, practical steps every day – such as turning off unwanted lights or setting thermostats appropriately – which add up over time to reduce our consumption of water, fuel, and electricity.

Human Rights

Bumble safeguards the human rights of individuals and communities in everything we do, and we expect our business partners to share this commitment.

Why We Do What's Right

Bumble supports the dignity and equality of all human beings. We believe that human trafficking, slavery, child labor, and unsafe and unfair work practices have no place in our global society.

How We Live Our Code

We treat all people with dignity and respect by:

- Providing proper working conditions, hours, and compensation to all Bumble employees.
- Ensuring our partners are committed to fair labor and sustainable sourcing practices that protect the health and well-being of workers and communities.
- Never using child or prison labor anywhere in the world.
- Refusing to look the other way when we see or suspect human rights violations, and alerting Bumble leadership when we do.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

The Political Process

We encourage active participation in the political process, which can make a positive difference in our lives and our communities.

Why We Do What's Right

We believe that an open and robust political process makes for a fairer, more efficient, and more productive society. Bumble supports the rights of every employee to participate in the political process and engage in civic activities, including holding political office. However, we should maintain separation between our personal political activities and those of Bumble.

When acting as a corporate citizen, Bumble follows all rules governing corporate political contributions and lobbying activities.

How We Live Our Code

Whether acting as individuals or on behalf of Bumble, we participate ethically in the political process when we:

- Always make it clear that our personal political views and actions are our own, and not those of Bumble.
- Always comply with federal, state, and local political campaign finance and election laws.
- Never make any direct or indirect political contributions on behalf of Bumble without advance approval.
- Engage constructively with government partners.
- Never use improper means in attempting to influence government agencies, representatives, or legislators to produce an outcome that is favorable to Bumble.
- Follow all applicable rules regarding public disclosure and all reporting requirements related to lobbying activities.
- Are respectful and tolerant of our colleagues' political views to the extent we choose to engage in political discussion or personal social media activities.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Giving Back

We are committed to supporting the communities where we live and work, while also helping to address broader challenges in the countries where we operate.

Why We Do What's Right

We can't create empowering connections without caring for people. By supporting our communities and working collectively to build a better, more equitable world, we put our commitments to kindness, equality, and accountability into action.

How We Live Our Code

We contribute to our local communities and society in general when we:

- Volunteer and participate in charitable activities in our communities around the world.
- Always obtain proper approval before making contributions on behalf of Bumble.
- Ensure that outside activities do not interfere with our job performance or create a conflict of interest.
- Never pressure others to contribute to charitable organizations or other community activities.

Where Can I Learn More?

For more information, please visit our [policies page](#) on the intranet or contact a member of your local People & Culture Team.

Living Our Values, Following Our Code

By building a supportive, inclusive connections platform we are enabling people to meet each other in a comfortable, equal, healthy way. We will only fulfill this mission when we live our values day in, day out, and when we are unwavering in our commitment to the highest ethical standards.

Our success depends on all of us understanding what that means in principle, but also in the day-to-day decisions we make and actions we take. The guidance in this Code helps keep our actions focused on our goals and helps ensure we not only achieve them, but we achieve them the right way.

Additional Resources for Seeking Help and Speaking Up

In addition to any other avenue available, you may report to the Audit Committee or the Chief Legal and Compliance Officer openly, or anonymously (in the case of employees), any accounting allegation, compliance allegation (including non-compliance with applicable legal and regulatory requirements or the Code), or retaliatory act in the following ways:

Phone

Country	Number
Australia	1800 940 362
Brazil	0800 000 0037
Canada	844 980 3565
Germany	0800 1815016
India	000 800 9191 197
Isle of Man	5034952689
Israel	1 809 399 881
Malta	8006 2789
Mexico	800 681 1531
Russia	8 (800) 301 69 59
Spain	900 999 458
United Kingdom	0800 090 3109
United States	844 980 3565

Online

<https://bumble.ethicspoint.com>

Email

Chief Legal and Compliance Officer:

clo@team.bumble.com

Audit Committee:

auditcommittee@team.bumble.com

The telephone hotlines and website are managed by EthicsPoint, an outside independent service provider, and allow any employee or other interested party of Bumble to make a report. Employees are able to submit a report on an anonymous basis.

Amended as of May 28, 2021