



DoubleVerify

# DoubleVerify Code of Ethics

## Let's Build a Better Industry®

That is what drives us every day at DoubleVerify; we are committed to preserving a free, ad-supported Internet that is impactful for brands, sustainable for publishers and respectful of consumer choice.

### We reach these goals by living our core values of:



**Unwavering Integrity**



**Authentic**



**Trailblazing**



**Passionate**



**Courageous**



**Diverse**

And to put our core values to work, we abide by a code of ethics. In each decision, we strive to consider how to best do business for and with all of our stakeholders – employees, customers, partners, community, shareholders and industry.

Please make a commitment to read the code of ethics and live by our core values – both in spirit and letter – when making decisions.

## The DoubleVerify Code of Ethics

### Who Is Responsible for Following Our Code of Ethics?

We expect all of our employees and members of our board of directors to know and follow the Code of Ethics. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code of Ethics is written for DV employees and board members, we expect DV contractors, consultants and others who may be temporarily assigned to perform work or services for and on behalf of DV to follow the Code of Ethics in connection with their work.

### We Are Authentic

**Honor Privacy:** Know your responsibilities under our privacy and security policies. Our security procedures require that each of us take measures to protect data from unauthorized access and limit the access and use of personal information. Collect, use and access personal information only as authorized by our security policies, our privacy policies and applicable data protection laws.

## See our Confidentiality of Business Information Policy.

DV is the industry leader in providing transparency and accountability in online advertising. We take seriously our responsibility to be transparent and accountable with information that we collect through our services and the personal information of our employees, partners and customers. In all practices, DV is committed to advancing privacy and protecting personal information.

DV's services do not collect and use personal information that may directly or indirectly identify individuals, except for providing fraud prevention services and for geography compliance services. When collecting personally identifiable information for fraud prevention and for geography compliance, the data will be used only for these purposes and will never be used for other purposes or services, unless required by law.

**Protect Company Information:** Both during and after your employment, you must not disclose confidential company information to anyone outside of DV or to another employee not entitled to access the information.

Many details about how the company operates need to be kept confidential in order for DV to remain competitive and successful. During the course of your work, you may learn trade secrets or confidential information that belongs to DV, including, but not limited to, ideas, inventions, discoveries, software, apparatus, improvements, trade secrets, customer lists and information, financial information, leases, licenses, agreements, sales figures, business plans and proprietary information. All of this information, whether about DV, its subsidiaries or affiliates, its customers, suppliers or employees, is strictly confidential.

**Protect Customer, Partner and Third-party Information:** Don't access, use or share any confidential or proprietary information received from advertisers, agencies, publishers or other business partners unless you have the right to do so.

DV respects the confidentiality and intellectual property rights of others, and we do not use others' confidential information without authorization. We are also responsible for the protection of our customers' and partners' confidential information and are contractually obligated to protect it.

## We Are Passionate

**Build a Better Industry:** DV is driven by a mission – to build a better advertising industry. We help brands improve the effectiveness of their online advertising, giving them clarity and confidence in their digital investment. Confidence is built on trust. Trust is achieved when a company's mission, team and actions are aligned – doing things for the right reasons, with transparency and authenticity. Trust is foundational to the lasting partnerships we've built with global advertisers, as well as the world's leading programmatic and social platforms, and publishers.

**Be Customer Passionate:** We are invested in our customers and their success. We view ourselves as an extension of our customers' teams and want to reach the same goals that they do.

**Communicate Thoughtfully:** Everyone at DV should have a voice, and we encourage you to be an active member of your community, but not everyone can speak publicly on behalf of DV.

Externally, our Marketing Team handles inquiries from the media, regardless of whether they are “on the record” or “off the record.”

In addition, remember that the Internet is a public space. You should ensure your outside communications (including online and social media posts) do not disclose confidential information or represent (or otherwise give the impression) that you are speaking on behalf of DV unless you’re authorized to do so by the company. When speaking or writing as a citizen, an employee should be accurate, should exercise appropriate restraint, and should show respect for the opinions of others.

These policies are not intended to restrict your freedom of speech or personal involvement in community activities or affect your individual rights to express personal opinions that are not-related to the actions and policies of DV. We encourage you to speak up. Be passionate. Stand for each other. **See our External Communications Policy and our Social Media Usage Policy.**

**Work as a Team:** Solid teamwork requires us to treat others with dignity and respect, and we are committed to a supportive work environment, in which employees have the opportunity to reach their fullest potential.

## We Are Trailblazing

**Respect Intellectual Property:** We are confident, bold and take risks to create technology and ideas, and it is important to protect those ideas through legal tools such as copyrights and patents. DV also respects the intellectual property rights of others. You must have the right to use trademarks, copyrights or other protected materials of third parties or you could expose DV or yourself to liability.

Our work depends on creating an environment that allows DV employees to be trailblazing and invent ways to build a better industry. All of this intangible property is called intellectual property, and it includes all copyrights, patents, trademarks, trade secrets, design rights, logos and brands. DV owns the rights to all intellectual property created with company materials or on company time. **See our Confidentiality of Business Information Policy.**

**Promote Professional Development:** Our team is passionate and dedicated to excellence, and our employees are our greatest asset. DV is committed to investing in the development of our employees.

At DV, you will learn, develop and grow in a way that meaningfully changes the trajectory of your career. DV is a career destination for trailblazing, passionate and talented people who are driven to seek the innovation, growth and opportunity that we offer.

## We Are Diverse

**Support Diversity and Inclusion:** At DV, each of us is unique and valuable, and our culture benefits from the diverse skills, experiences, capabilities and backgrounds each of us brings to the company. By bringing together different talents, backgrounds and perspectives, we will accelerate our performance as a company and our mission is to build a better industry. We will

continue to live our core values, and elevate and amplify diverse voices through our community of employees, customers, partners and shareholders.

**Provide Equal Employment Opportunity:** DV provides equal employment opportunities to all employees and applicants in all company facilities. Equal employment opportunities are those without regard to race, color, religion, religious creed, sex, national origin, ancestry, citizenship status, pregnancy (or related medical conditions, including, but not limited to lactation), physical disability, mental disability, age, military or veteran status, marital status, partnership or civil union status, medical condition (including, but not limited to, cancer or HIV/AIDS related status), genetic information, sexual orientation, gender identity, gender expression, caregiver status, domestic violence status, hair texture and protected hairstyles. [See our Equal Employment Opportunity Policy.](#)

## We Are Courageous

**Speak Up:** When something is not right, and if a fellow employee or DV as a company is not living our core values or following this code of ethics, don't be silent; speak up. Remember, our non-retaliation policy means you don't need to be afraid of asking questions or reporting potential issues. [See our Reporting Policy.](#)

### If you have a concern or a question, you can:

- Talk to your local manager.
- Contact your local Human Resources.
- Contact the Legal Department.
- Contact our reporting service, DV Speaks Up.

## We Possess Unwavering Integrity

**Create Safe Workspaces:** At DV, we stand for each other and we are committed to a work environment in which all individuals are treated with respect and dignity and are free from all forms of discrimination, harassment and bullying.

- **Anti-Harassment/Anti-Discrimination:** DV prohibits any form of harassment or discrimination on the basis of race, color, religion, sex, national origin, ancestry, citizenship status, pregnancy status, physical or mental disability, age, military or veteran status, marital status, partnership or civil union status, medical condition, sexual orientation, gender identity or expression or any other characteristic protected by law. [See our Anti-Harassment/Anti-Discrimination/Anti-Retaliation Policy.](#)
- **Anti-Bullying:** DV is committed to a work environment in which all individuals are free from all forms of abusive conduct. Abusive conduct, or "bullying," is conduct of an employer or employee in the workplace, with malice, that a reasonable person would find hostile, offensive and unrelated to an employer's legitimate business interests. [See our Anti-Bullying Policy.](#)

- **Anti-Retaliation:** DV will not tolerate any form of retaliation against any employee who, in good faith, opposes discrimination or prohibited harassment, files a complaint or that testifies, assists, or participates in any manner in an investigation, proceeding, or hearing conducted by the company, a state or federal agency. If you believe that you have experienced or witnessed retaliation, you should immediately report your concern to Human Resources or the Chief Legal Officer. Any employee who engages in retaliation will be subject to disciplinary action, up to and including termination. **See our Anti-Harassment/Anti-Discrimination/Anti-Retaliation Policy**

**Avoid Conflicts of Interest:** In the interest of transparency, promptly disclose to DV any activity, transaction or relationship that may create an actual, potential, or even appearance of a conflict of interest with the company.

We should make decisions based on what is good for our fellow employees and the company. A conflict of interest arises when our judgment in acting on behalf of DV is or may be influenced by an actual or potential personal benefit of any kind. **See our Conflict of Interest Policy.**

**Comply with Anti-Corruption Laws:** DV complies with anti-corruption laws that govern our operations in the countries in which we do business and require directors, officers, employees, agents, consultants, contractors, business partners, and other third parties to act on DV's behalf and comply with such laws.

Generally, these laws prohibit bribery, directly or indirectly, of foreign government officials (including employees of foreign government-owned entities), political parties, or candidates to obtain some improper business advantage. **See our Global Transactions Policy.**

- **Insider Trading:** In our work, we may become aware of material, nonpublic information about DV or companies we do business with. Trading while in possession of material, non-public information is illegal and strictly prohibited, whether it is information about DV or another company. Material, nonpublic information is any information that has not been disclosed to the public and that a reasonable investor might use to buy, sell or hold stock in a company.
- **Anti-Money Laundering:** DV is committed to complying with the Currency and Foreign Transactions Reporting Act (or Bank Secrecy Act); Money Laundering Control Act, USA PATRIOT Act; and all other U.S. and non-U.S. Laws relating to anti-money laundering ("AML"). AML laws prohibit engaging in any financial transaction involving the proceeds of specified unlawful activities. AML laws also require the filing of currency transaction reports relating to the receipt of large cash payments in the course of a trade or business. As a result, DV employees and its representatives are prohibited from:
  - Accepting any payment in cash from a DV counterparty; or
  - Engaging in any financial transaction that you have reason to believe may involve the proceeds of any conduct in violation of applicable laws or DV policies.
- **Export/Import, Economic Sanctions and Other Trade Restrictions:** DV complies with all export and import laws and regulations that govern the transfer between countries of certain technical data, equipment and technology and will require its representatives to

comply with such laws. In addition, DV and its representatives will not engage in trade in any country that is currently subject to trade restrictions imposed by the United States. DV must also comply with the other sanctions laws applicable to it and its owned or controlled entities in the other jurisdictions where it operates.