

DOUBLEVERIFY HOLDINGS, INC. CODE OF BUSINESS CONDUCT

Effective as of April 15, 2021

General Policy and Procedures

This Code of Business Conduct (this “Code”) of DoubleVerify Holdings, Inc. and its subsidiaries (collectively, the “Company”) applies to all directors, officers and employees of the Company (each, a “Covered Person” and, collectively, the “Covered Persons”), and must be strictly observed. Failure to do so could result in disciplinary action, up to and including termination. This Code is intended to comply with the requirements of Section 406 of the Sarbanes-Oxley Act of 2002 and the New York Stock Exchange’s corporate governance standards for listed companies and shall be read in conjunction with the Company’s Code of Ethics, which is available at www.DoubleVerify.com/Code-of-Ethics.

The Company is committed to the highest standards of ethics and business conduct. The Company conducts its business as a good corporate citizen and complies with all laws, rules and regulations applicable to it or the conduct of its business. This commitment and standard of conduct governs our relationships with customers, suppliers, partners, shareholders, competitors, the communities in which we operate and with each other as Covered Persons at every organizational level.

The Code is an expression of our core values and represents a framework for decision-making. To this end, Covered Persons are responsible for understanding the Code and acting in accordance with it. The Code cannot and is not intended to cover every applicable law, rule or regulation or provide answers to all questions that may arise; for that, we must ultimately rely on each Covered Person’s good sense of what is right, including a sense of when it is proper to seek guidance from others with respect to the appropriate course of conduct. Questions regarding any law, rule, regulation or principle discussed in this Code which may govern business conduct, should be directed to your supervisor, the Chief Legal Officer of the Company (the “Chief Legal Officer”) or the confidential DV Speaks Up reporting service at 1-800-454-2134 or www.DVSpeaksUp.com.

The Code does not in any way constitute an employment contract or an assurance of continued employment. It is for the sole and exclusive benefit of the Company and may not be used or relied upon by any other party. The Company may modify or repeal the provisions of the Code or adopt a new Code at any time it deems appropriate, with or without notice.

Compliance with Laws, Rules & Regulations

Covered Persons are required to comply fully with all laws, rules and regulations affecting the Company’s business and its conduct in business matters. The Company conducts

its business globally where applicable laws, rules, regulations, customs and social requirements may be different from those in the United States. It is the Company's policy to abide by the national and local laws of our host nations and communities. The fact that in some countries certain standards of conduct are legally prohibited, but these prohibitions are not enforced in practice, or their violation is not subject to public criticism or censure, will not excuse any illegal action by a Covered Person. In the case of any conflict between foreign and United States law, or in any situation where a Covered Person has a doubt as to the proper course of conduct, it is incumbent upon a Covered Person to immediately consult the Chief Legal Officer.

Beyond the strictly legal aspects involved, Covered Persons at all times are expected to act honestly and maintain the highest standards of ethics and business conduct, consistent with the professional image of the Company.

Confidential, Proprietary Information

A Covered Person may come into the possession of Confidential Information (as defined herein) that belongs to the Company in the course of such Covered Person's employment. All such Confidential Information, whether about the Company, its subsidiaries or affiliates, its customers, suppliers or employees, is strictly confidential. Covered Persons shall not disclose this information to anyone, including family members, outside of the Company or to any Covered Person who does not have a need to know such Confidential Information.

- **Company Information.** Each Covered Person shall, during the term of employment and thereafter, hold in strictest confidence, and not use, except for the benefit of the Company, or disclose to any person, firm or corporation any Confidential Information of the Company, unless disclosure of such Confidential Information is appropriately authorized or legally mandated. "Confidential Information" means any Company proprietary information, technical data, trade secrets or know-how, including, but not limited to, research, product plans, products, database information services, customer lists and customers, markets, computer software (in object code or source code form), developments, inventions, processes, formulas, technology, designs, drawings, engineering, marketing, finances or other business information. Confidential Information does not include any of the foregoing items which has become publicly known and made generally available through no wrongful act of a Covered Person or of others who were under confidentiality obligations as to the item or items involved.
- **Former or Other Employer Information.** Covered Persons (i) shall not, during such Covered Person's term of employment with the Company, improperly use or disclose any Confidential Information of any former or concurrent employer or other person or entity and (ii) shall not bring onto the premises of the Company any unpublished document or proprietary information belonging to any such employer, person or entity unless consented to in writing by such employer, person or entity.

- **Third Party Information.** Company has received and in the future will receive from third parties Confidential Information subject to a duty on the Company's part to maintain the confidentiality of such Confidential Information and to use it only for certain limited purposes. Each Covered Person shall hold all such Confidential Information in the strictest confidence and not disclose such Confidential Information to any person, firm or corporation or use such Confidential Information except as necessary in carrying out such Covered Person's work for the Company consistent with the Company's agreement with such third party.

Confidential Information may be disclosed to others when disclosure is authorized by the Company or legally mandated. The obligation to preserve Confidential Information is ongoing, even after termination of employment.

Any doubts about the confidentiality of information should be resolved in favor of confidentiality. If you have any questions, please reach out to the Chief Legal Officer.

Conflicts of Interest

Covered Persons must base business decisions and actions on the best interest of the Company. Accordingly, Company policy prohibits conflicts of interest. A conflict of interest arises when a Covered Person's judgment in acting on behalf of the Company is or may be influenced by an actual or potential personal benefit of any kind. The benefits may be direct or indirect, may or may not be financial in nature, and could exist through family connections, personal associations or otherwise.

In all situations, Covered Persons are expected to conduct business activities with integrity, ethically and in accordance with applicable laws and regulations. Covered Persons should not engage in any work activity, practice or conduct which is or appears to be a conflict of interest for the company, its customers, suppliers, partners, contractors, competitors or any person doing or seeking to do business with the Company. Violations of this conflict of interest policy may result in disciplinary action, including and up to immediate termination.

Conflicts of interest can undermine the Company's business judgment and the Company's responsibility to the Company and threaten the Company's business and reputation. Accordingly, all apparent, potential, and actual conflicts of interest should be avoided. Though it is not possible to list every activity or situation that might raise a conflict of interest issue(s), the list below is included to help Covered Persons recognize some of the more significant ones:

- **Corporate Opportunities.** Taking opportunities that are discovered through the use of corporate property, information or position or using corporate property, information or position for personal gain or competing with the Company.

- **Gifts.** Soliciting or accepting a promise of future employment or any gift, gratuity, reward or anything else of monetary value that might appear to influence a Covered Person's judgment or create a conflict in the performance of a Covered Person's job. Covered Persons may accept occasional unsolicited courtesy gifts or favors (such as business lunches, tickets to sporting events or cultural events, holiday baskets, flowers, etc.) so long as the gifts or favors have a market value under \$100, are customary in the industry and do not influence or appear to influence an Covered Person's judgment or conduct. Contact a Department Head and/or the Human Resources Department for guidance as needed.
- **Loans.** Providing loans to, or guarantees of obligations of, Covered Persons or their family members. Such activity will not be allowed without the prior written approval of the Chief Legal Officer, and if appropriate, the board of directors of the Company (the "Board") or a committee of the Board. The Company will not extend, maintain or arrange for any personal loan to or for any director or executive officer (or the equivalent thereof).
- **Outside Activity.** Engaging in any outside activity that materially detracts from or interferes with the performance by a Covered Person of his or her services to the Company.
- **Outside Employment.** Serving as a director, representative, employee, partner, consultant or agent of, or providing services to, an enterprise that is a supplier, partner, customer or competitor of the Company.
- **Personal Interests.** Having a direct or indirect personal interest in a transaction involving the Company.
- **Personal Investments.** Directly or indirectly owning a material amount of stock in, being a creditor of, or having another financial interest in, a supplier, partner, customer or competitor.
- **Bribes, Kickbacks and Illegal Payments.** Bribes, kickbacks and other illegal payments to or from any individual with which the Company conducts business (in any form and for any purpose) are prohibited. Under federal statutes, accepting or offering bribes and kickbacks is a crime, punishable by imprisonment and substantial fines, including by making payments or gifts to foreign officials, political parties or candidates for the purpose of influencing them to misuse their official capacity to secure business advantages. Certain types of rebates to the Company from suppliers (but not to or from an individual employee) are legitimate to correct commercial inequity if conducted in accordance with government trade regulations. Covered Persons are specifically prohibited from benefiting in any manner from Invalid Traffic (IVT) generation, or from the purchasing or selling of IVT (except in the normal course of business as related to Company-sanctioned research).

All potential and actual conflicts of interest or material transactions or relationships that reasonably could be expected to give rise to such a conflict or the appearance of such a conflict

must be promptly disclosed to the Chief Legal Officer. Covered Persons should take care to report conflicts to a person who they believe is not involved in the matter giving rise to the conflict.

Any Covered Person who has a doubt about whether a conflict of interest exists after consulting this provision of the Code, should contact the Chief Legal Officer.

Fair Dealing

The Company's success depends on building productive relationships with one another and third parties based on honesty, integrity, ethical behavior and mutual trust. Every Covered Person should endeavor to deal fairly with each of our customers, suppliers, partners, competitors and other Covered Persons. No Covered Person should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practices.

Insider Trading

As insider trading is a violation of this Code, the Company's Insider Trading Policy and federal and state laws, Covered Persons should review this Code and the Company's Insider Trading Policy before trading in securities and direct all questions and concerns to the Chief Legal Officer.

Quality of Disclosures

Federal and state securities laws impose continuing disclosure requirements on the Company and require the Company to regularly file certain reports with and make certain submissions (the "Reports") to the U.S. Securities and Exchange Commission and the New York Stock Exchange and disseminate them to the Company's shareholders. Such Reports must comply with all applicable legal and exchange requirements and may not contain material misstatements or omit material facts.

All (i) Covered Persons directly or indirectly involved in preparing such Reports, (ii) any Covered Persons who regularly communicate with the press, investors and analysts concerning the Company and (iii) all representatives who assist the Company in preparing such Reports and communications will ensure that such Reports and communications are full, fair, timely, accurate and understandable and meet all legal requirements. This policy applies to all public disclosure of material information about the Company, including written disclosures, oral statements, visual presentations, press conferences and media calls.

Protection and Proper Use of Assets

Proper and efficient use of Company, supplier, partner, customer and other third party assets, such as electronic communication systems, information (proprietary or otherwise), facilities and equipment, as well as intangible assets, is the responsibility of each Covered Person. Covered Persons must not use such assets for personal profit for themselves or others. In addition, Covered Persons must act in a manner to protect such assets from loss, damage, misuse, theft, removal and waste. Finally, Covered Persons must ensure that such assets are used only for legitimate business purposes. However, in limited instances, Company assets may be used for other purposes approved by management.

Reporting of any Illegal or Unethical Behavior

Any Covered Person who is aware of any illegal or unethical behavior or who believes that an applicable law, rule or regulation or this Code has been violated, must promptly report the matter to the Chief Legal Officer. In addition, a Covered Person who has a concern about the Company's accounting practices, internal controls or auditing matters should report his or her concerns to the Chief Legal Officer. Any Covered Person wishing to make a report with respect to any of these matters anonymously, or to discuss a sensitive issue or question, may contact the Company's confidential DV Speaks Up reporting service at 1-800-454-2134 or www.DVSpeaksUp.com. Covered Persons should take care to report violations to a person who they believe is not involved in the matter giving rise to the violation. All reports of violations will be promptly investigated and, if appropriate, remedied, and if legally required, immediately reported to the proper governmental authority.

Covered Persons will be expected to cooperate in assuring that violations of the Code are promptly addressed. The Company has a policy of protecting the confidentiality of those making reports of possible misconduct to the maximum extent possible, consistent with the requirements necessary to conduct an effective investigation and the law. In no event will there be any retaliation against someone for reporting an activity that he or she in good faith believes to be a violation of any law, rule, regulation or this Code. Any supervisor or other Covered Person intimidating or imposing sanctions on a Covered Person for reporting a matter will be disciplined up to and including termination.

Covered Persons should know that it is a crime to retaliate against a person, including with respect to their employment, for providing truthful information to a law enforcement officer relating to the possible commission of any federal offense. Covered Persons who believe that they have been retaliated against by the Company, its employees, contractors, subcontractors or agents, for providing information to or assisting in an investigation conducted by a federal agency, Congress or a person with supervisory authority over the Covered Person (or another Covered Person who has the authority to investigate or terminate misconduct) in connection with conduct that the Covered Person reasonably believes constitutes a violation of federal criminal fraud statutes or any rule or regulation of the Securities and Exchange Commission, may file a

complaint with the Secretary of Labor, or in federal court if the Secretary of Labor does not take action in a timely manner.

Responding to Improper Conduct

This Code will be enforced on a uniform basis for everyone, without regard to a Covered Person's position within the Company. If a Covered Person violates the Company's Code, he or she will be subject to disciplinary action. Supervisors and managers of a disciplined Covered Person may also be subject to disciplinary action for their failure to properly oversee an Covered Person's conduct, or for retaliation against an Covered Person who reports a violation(s).

The Company's response to misconduct will depend upon a number of factors including whether the improper behavior involved illegal conduct. Disciplinary action may include, but is not limited to, reprimands and warnings, probation, suspension, demotion, reassignment, reduction in salary or immediate termination. Covered Persons should be aware that certain actions and omissions prohibited by the Code might be crimes that could lead to individual criminal prosecution and, upon conviction, to fines and imprisonment.

Waivers

Covered Persons should understand that waivers or exceptions to our Code will be granted only in advance and only under exceptional circumstances. A waiver of this Code for any executive officer or director may be made only by the Board or a committee of the Board and must be promptly disclosed to shareholders in accordance with applicable law and New York Stock Exchange requirements.

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