

DV Speaks Up

Maybe you sense that something is not right at work. Maybe you saw something or heard about an act that does not live up to DV's Core Values, or that may violate our Code of Ethics, our policies or the law. If so, you have a responsibility to share your concerns.

A Core Value of DV is unwavering integrity. We do the right thing. And when you share concerns, you hold us to that standard and help us handle issues properly, address problems before they occur and remedy situations that have already happened. You also help build trust with each other and with our customers and business partners.

DV is *all in*. We want you to speak up – in fact we encourage it – because every single one of us has a responsibility to make sure we live our Core Values at DV.

How to Share Concerns

When you have a concern or a question, you can:

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

DV Speaks Up

DV Speaks Up is a 24-hour reporting service available to all DV employees, stakeholders and partners to raise concerns, share that someone or something is not living up to DV's Core Values, or report suspected violations of our Code of Ethics, our policies or the law. Remember, our non-retaliation policy means you don't need to be afraid of asking questions or reporting potential issues.

This reporting service is run by an independent third party. You can contact DV Speaks Up by phone, by web, app or sms. Translation services are also available.

The DV Speaks Up service is available anywhere in the world:

- By phone using a special toll-free telephone number based on the country from which you are calling. In the United States call 1.800.454.2134. For a list of international country phone numbers, visit www.DVSpeaksUp.com.
- By web available at www.DVSpeaksUp.com.
- By sms at 929.389.0333.

What Happens When You Report a Concern

- You may choose to remain anonymous, where permitted by law.
- If you do give your name, we will do all we can to protect your identity consistent with conducting a thorough investigation.
- We take every report seriously and will investigate it thoroughly and as confidentially as possible.
- We expect everyone involved to cooperate fully and honestly.

To assist in investigating your report, you are encouraged to communicate all of the information you feel comfortable providing. We will do all we can to keep the information confidential consistent with conducting a full, fair investigation. You may remain anonymous if you so choose, except if restricted by local law.

None of your personal information, including but not limited to, your phone number or IP address will be recorded or included in any report, unless you voluntarily provide such information. What matters is what is being reported, not who reports it. We will only collect and issue any information submitted by you for the purposes of assessing and addressing reports and limit the collection of personal information necessary to process the report. ***For details on the processing of personal information, please see our Privacy Policy (<https://doubleverify.com/privacy-policy/>).***

Special note for the European Union: Due to local privacy laws in certain countries and the European Union, the Speak Up line may permit only specific types of calls, such as accounting, financial, auditing and bribery matters. In those countries, contact your local Human Resources to report other issues.

No Retaliation

You are the eyes, ears and conscience of DV, and we value your help to make everyone at DV is living up to our Core Values. DV is committed to protecting the rights of those individuals who report issues either through one of the reporting means described above or to government authorities. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in an investigation. Sharing a good-faith concern honestly, even if it turns out to be unfounded – is never an excuse for any kind of retaliation.

Retaliation against an employee for reporting an issue in good faith is itself a violation of our Code of Ethics. If you know or suspect that retaliation has occurred or is occurring, you should report it. ***See DV's Anti-Harassment/Anti-Discrimination/Anti-Retaliation Policy.***

No False Accusations

As much as we encourage honestly raising concerns, we do not tolerate knowingly false reports. Making a false accusation can divert investigatory resources away from credible good-faith concerns and damage morale. Report what you have a reasonable, good-faith belief be true, but never knowingly make a false accusation, lie to investigators or refuse to cooperate in an investigation.

See Exhibit A, DoubleVerify Holdings, Inc. Whistleblower Policy

EXHIBIT A

DOUBLEVERIFY HOLDINGS, INC. WHISTLEBLOWER POLICY

Effective as of April 15, 2021

Purpose

DoubleVerify Holdings, Inc. (the “Company”) is committed to high standards of ethical, honest and legal business conduct. In line with this principle and our commitment to open communication, this Whistleblower Policy (this “Policy”) provides an avenue for employees and other interested parties to bring to our attention illicit or illegal conduct and reassurance that they will be protected from reprisals for raising such concerns. This Policy is intended to cover protections for bringing to our attention questionable business conduct at the Company (“Reports”) such as:

- (a) questionable accounting, internal accounting controls and auditing matters, including fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company, fraud or deliberate error in the recording and maintaining of financial records of the Company, deficiencies in, circumvention or attempted circumvention of, or non-compliance with, the Company’s internal accounting controls, misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company or deviation from full and fair reporting of the Company’s financial condition (an “Accounting Allegation”);
- (b) compliance with legal and regulatory requirements (a “Legal Allegation”); and
- (c) retaliation against employees who make Accounting Allegations or Legal Allegations (a “Retaliatory Act”).

This Policy is intended to comply with the requirements of Section 301 of the Sarbanes–Oxley Act of 2002, Section 922 of Dodd-Frank Act of 2010 and the New York Stock Exchange’s corporate governance standards for listed companies.

Procedures for Receiving Reports

Any Report that is made directly to senior management, whether openly, confidentially or anonymously, shall be promptly reported to the Audit Committee of the Company (the “Audit Committee”).

Each Report forwarded to the Audit Committee by senior management and each Report that is made directly to the Audit Committee, whether openly, confidentially or anonymously, shall be reviewed by the Audit Committee, who may, in their discretion, consult with any member of senior management who is not the subject of the allegation and who may have appropriate expertise to assist the Audit Committee. The Audit Committee shall determine whether the Audit

Committee or senior management should investigate the Report, taking into account the considerations set forth herein.

- (a) If the Audit Committee determines that senior management should investigate the Report, the Audit Committee will notify the Chief Legal Officer of the Company (the “Chief Legal Officer”) in writing of that conclusion. Senior management shall thereafter promptly investigate the Report and shall report the results of its investigation, in writing, to the Audit Committee. Senior management shall be free in its discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.
- (b) If the Audit Committee determines that it should investigate the Report, the Audit Committee shall promptly determine what professional assistance, if any, it needs in order to conduct the investigation. The Audit Committee shall be free in its discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results.

In the discretion of the Audit Committee, responsibilities of the Audit Committee created by these procedures may be delegated to the Chair of the Audit Committee or to a subcommittee of the Audit Committee.

Considerations Relative to Whether the Audit Committee or Senior Management Should Investigate a Report

In determining whether senior management or the Audit Committee should investigate a Report, the Audit Committee shall consider, among any other factors that are appropriate under the circumstances, the following:

- (a) Who is the alleged wrongdoer? If an executive officer, senior financial officer or other high senior management official is alleged to have engaged in wrongdoing, that factor alone may weigh in favor of the Audit Committee conducting the investigation.
- (b) How serious is the alleged wrongdoing? The more serious the alleged wrongdoing, the more appropriate that the Audit Committee should undertake the investigation. If the alleged wrongdoing would constitute a crime involving the integrity of the financial statements of the Company, that factor alone may weigh in favor of the Audit Committee conducting the investigation.
- (c) How credible is the allegation of wrongdoing? The more credible the allegation, the more appropriate that the Audit Committee should undertake the investigation. In assessing credibility, the Audit Committee should consider all facts surrounding the allegation, including but not limited to whether similar allegations have been made in the press or by analysts.

Protection of Whistleblowers

It is the policy of the Company to encourage employees and other interested parties, when they, in good faith, reasonably believe that any questionable conduct regarding accounting, internal

accounting controls, auditing matters or legal or regulatory compliance, has occurred, is occurring or is about to occur, to report those concerns immediately. Consistent with the policies of the Company, the Audit Committee shall not retaliate, and shall not tolerate any retaliation by senior management or any other person or group, directly or indirectly, against anyone who, in good faith, makes an Accounting Allegation or Legal Allegation, reports a Retaliatory Act or provides assistance to the Audit Committee, senior management or any other person or group, including any governmental, regulatory or law enforcement body, investigating a Report. The Audit Committee shall not, unless compelled by judicial or other legal process, reveal the identity of any person who makes an Accounting Allegation or Legal Allegation or reports a Retaliatory Act and who asks that his or her identity as the person who made such Report remain confidential and shall not make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a Report anonymously. This Policy shall be read in conjunction with DV Speaks Up, as provided in the Company's Employee Handbook, and the non-retaliation policies contained therein.

Records

The Chief Legal Officer shall retain for a reasonable period of time (or in accordance with any document retention policy instituted by the company) all records relating to any Accounting Allegation or Legal Allegation or report of a Retaliatory Act and to the investigation of any such Report.

Procedures for Making Complaints

In addition to any other avenue available to an employee, including DV Speaks Up, any employee or shareholder may report to the Audit Committee openly, confidentially or anonymously any Accounting Allegation or Legal Allegation or report of a Retaliatory Act. Accounting Allegations, Legal Allegations and reports of a Retaliatory Act can be made orally or in writing to the Chief Legal Officer. The Chief Legal Officer can be contacted at:

Andy Grimmig
DoubleVerify Holdings, Inc.
233 Spring Street
New York, NY 10013
Phone: 212-631-2111
E-mail: andygrimmig@doubleverify.com

Such Reports can also be made anonymously by calling the DV Speaks Up reporting service at 1-800-454-2134, by SMS at 929-389-0333 or at www.DVSpeaksUp.com. The toll-free line is managed by an outside, independent service provider and allows anyone to make a Report without divulging his or her name. The helpline service provider is required to share the information provided in the Report to senior management.

The reporting individual should provide names, dates, places and other details sufficient to facilitate an effective investigation.

Cooperation with Investigations

All information disclosed during the course of any investigation will remain confidential, except as necessary to conduct, conclude, and, if appropriate, prosecute the investigation. In the case of any anonymous complaint, a person who reports a suspected violation may not be informed of the results of an investigation.

All employees and members of senior management have a duty to promptly cooperate and provide accurate information in connection with any investigation of reports of questionable conduct, or of discrimination, retaliation or harassment resulting from the reporting or investigation of such matters.

Prompt and appropriate corrective action will be taken when and as warranted. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported, and the facts proven by investigation. The persons responsible for any misconduct, or those failing to cooperate or who provide false information during an investigation, will be subject to disciplinary action, up to and including termination.

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