



Klaviyo Code of Conduct

A Note From Andrew Bialecki



Team,

Our success to date has everything to do with your commitment to our Klaviyo values. Since we started, our reputation and brand have been based on trust -- between each other, our partners, and our customers. We are all representatives and stewards of the culture we've created at Klaviyo -- a culture where every employee can be themselves, do their best work, and feel comfortable speaking up.

As we grow, it will be more important than ever to continue to protect our reputation and stay true to our core values at every turn ahead. Our Code of Conduct outlines our legal and ethical commitments that will keep us true to our culture and our values. Our Code applies to all of our employees (me included), those doing business on our behalf, as well as each of our Board members. As you read and better understand the Code, you should feel empowered to operate at the highest level within these guiding principles. Together, we're 1% done and our greatest work will be ahead of us.

I know there's a lot in here, so if you have a Code-related question or concern, I encourage you to speak up. Email integrity@klaviyo.com or reach out directly to our Chief Legal Officer. You can also submit a question or raise a concern of a suspected violation of our Code or any other Klaviyo policy through our Ethics & Compliance Helpline.

Thank you all for your continued commitment to our company, and our vision.

-AB

Table of CONTENTS

Within 5 days of receiving this Code please acknowledge receipt within our Workday platform or within the company LMS. You may also be asked periodically to confirm you have complied with our Code of Conduct.


<u>A Note from AB</u>	2
Our Responsibility Our Values and Culture	4
	5
<u>Speaking Up</u>	7
No Retaliation Reporting a Concern	7 8
<u>Our Responsibility to Each Other</u>	9
Integrity, Fairness, Respect A Note to People Leaders	10 12
<u>Conflicts of Interest</u>	13
<u>Our Responsibility to Our Customers</u>	16
Fair Dealing Gifts, Travel & Entertainment Privacy	17 18 19
<u>Winning with Integrity</u>	20
Anti-Bribery & Corruption Books and Records Insider Trading	21 22 23
<u>Transparency & Accountability</u>	24
Confidentiality Social Media Disciplinary Actions & Investigations Anonymity	25 26 27 28

Our Responsibility

Everyone who works for Klaviyo, from team members to directors to officers and board members has a responsibility to abide by this Code of Conduct. We understand that our Code will not provide an answer to every issue you may encounter or address every concern you may have about conducting the Company's business ethically and legally. In these situations we encourage you to speak with your people leader, or if uncomfortable with doing that, with the Compliance Officer or their designees. Klaviyo's Chief Legal Officer has been appointed the Compliance Officer under this Code. Failure to comply with our Code can result in disciplinary action up to and including termination. Contingent workers or vendors who may temporarily perform work or services for Klaviyo are required to follow the Code in connection with the work they do for us. Failure of a contingent worker or vendor to comply with our Code can result in termination of their relationship with Klaviyo.



Our Values



At Klaviyo, Inc. (together with its subsidiaries, “Klaviyo” or the “Company”), our values are what we believe and how we operate, which drives our decisions and behaviors. Our behaviors become our habits and define the culture we create together. Klaviyo’s Code of Conduct is one of the ways we create our culture, and we expect all of our employees and Board members to follow it in the workplace and any time you are acting as a representative of Klaviyo.



Put customers
first.

Win
together.

Know the
score.

Be
meticulous in
your craft.

Move fast, no
shortcuts.

Drivers
wanted.

Stay
hungry, stay
humble.

We're 1%
done.

Speaking Up

You don't need all the details, or even have to be certain that something is in violation of any law or rule to raise a concern. It takes courage to speak up, which is why we take concerns seriously and do our best to maintain fairness, transparency, and the privacy of all parties involved.

Concerns or questions regarding potential violations of the Code, a Company policy or procedure or laws, rules or regulations relating, in each case, to (i) accounting, internal auditing controls; (ii) auditing or securities laws matters; (iii) matters relating to corrupt practices or bribery; or (iv) improper disclosure of financial or other sensitive information should be reported to the Audit Committee in accordance with the procedures established in our Whistleblower Policy.

Retaliation

We have **zero** tolerance for retaliation at Klaviyo. Anyone who retaliates against an employee for raising a concern in good faith or participating in an investigation will be subject to disciplinary action, up to and including termination. Review our Whistleblower Policy for more details. **Note:** Employees must not use these reporting channels in bad faith or in a false or unreasonable manner.

Speak Up

Your voice matters

If you believe that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code or any law, rule, or regulation applicable to the Company, you must bring the matter to the attention of the Company.

How to Report a Concern

Email: integrity@klaviyo.com

Employee Hotline:

[Klaviyo.ethicspoint.com](https://klaviyo.ethicspoint.com)

[Klaviyomobile.ethicspoint.com](https://klaviyomobile.ethicspoint.com)

Contact one of the following:

- Klaviyo People Leader
- HR
- Compliance Officer or their designees
- Audit Committee Chair or other Audit Committee member

More information can be found within our [Whistleblower Policy](#).



Our Responsibility to Each Other

Klaviyo's culture is one that we create together. We are **humble**, transparent, and on a journey to be **better humans**, together. We express strong opinions with kindness and proactively seek feedback. **We listen**, we share, **we encourage**, we trust. We are quick to admit when we're wrong and even quicker to **help one another win**.

Use Integrity - It's key to our continued success. From collaborating with each other in meetings, to the creation of our new products, operating with integrity will lead us to making the right decisions, at the right time, in the right environments.

Be Fair - We want you and others to be treated fairly, and we'll do our best to ensure all aspects of Klaviyo policies, procedures, and outcomes are applied consistently regardless of who is involved.

Show Respect - We treat people both inside and outside of Klaviyo with equity, respect, honesty, and kindness. Collaboration is central to how we work, and we aim to create an inclusive environment where all Klaviyos are given the opportunity to achieve their full potential. Klaviyo hires candidates based on merit and qualifications for the position. We all work best when we feel safe and respected. For this reason, Klaviyo prohibits discrimination, harassment, and bullying in any form, as set forth in the Policy Against Harassment, Discrimination, and Retaliation. If you believe you've been bullied, harassed, or discriminated against by anyone at Klaviyo or by a Klaviyo vendor, contact your supervisor, HR Business Partner, or Legal.



Be Safe - Klaviyo is committed to providing a safe, healthy workplace that is free of violence. We each have a responsibility to work in a way that helps ensure the safety, health, and/or security of Klaviyos, contingent workforce, vendors, or visitors. If you become aware of a risk to health, safety, or security of our workplace, report it to securityhelp@klaviyo.com immediately. If it is a life-threatening emergency, call your local fire, police, or other emergency responder first, then report to securityhelp@klaviyo.com as you are able.

- Threats, intimidation, or violence toward anyone at work is not tolerated.
- Never work impaired by drugs or alcohol. Use good judgement and never drink in a way that leads to impaired performance or inappropriate behavior, puts the safety of yourself or others in danger, or violates the law. Review our Drug Free Workplace & Alcohol Use section in the Employee Handbook for further information.



Klaviyo People Leaders have additional responsibilities under the Code. Your ethical behavior will shape the experience Klaviyos have at our company more so than any benefit the company can offer.

We expect our People Leaders to:

- Understand the Code
- Enforce the Code and other Klaviyo policies consistently
- Make yourself available to Klaviyos when they have questions or concerns
- Never retaliate against those that report in good faith

**IF SOMEONE RAISES A CONCERN,
TAKE THESE SPECIFIC STEPS:**

- Remove distractions and listen carefully. Thank the person for speaking up— remember that they've just done something difficult and very important for the company.
- Respond respectfully and take every concern seriously, even if you disagree. Show that you are committed to solving the problem.
- Take steps to protect the person's confidentiality; avoid discussing the conversation with others on your team.

As a People Leader, you should feel empowered to resolve performance issues yourself, but you should escalate integrity concerns about business ethics or misconduct to Legal. If you have a question or are not sure whether you can or should resolve the issue yourself, you can always consult Legal for advice.



Stay hungry, stay humble.

Conflicts of Interest

Klaviyos don't limit themselves to the tools and solutions of today. We dream big and aim to solve the hardest of problems; problems that pull future technology into today. We understand that Klaviyos' interests and creativity go beyond our company.

A “conflict of interest” occurs when an employee’s personal or business interest interferes with the Company’s interests. As employees of Klaviyo, it’s our responsibility to manage conflicts responsibly and honor our commitments to the company.

We categorize conflicts in the following buckets:



Outside Employment



Outside Projects



Outside Ownership



Personal Relationships

Before engaging in any outside activity, first discuss with your People Leader. Keep in mind the following:

- If you are engaged in any outside activity that could pose an actual or perceived conflict, you need to raise the issue with your People Leader and disclose it to the Compliance Officer or their designees using the [COI Disclosure Form](#).
- We act in the best interest of **Klaviyo**.
- Each individual’s situation is different, and in evaluating the situation, Klaviyo will have to consider many factors.

Please review our **Conflict of Interest Policy** for more details.

We are all expected to act in Klaviyo's best interest and avoid situations where our personal interests could conflict with our responsibilities. This means:

- Don't claim any business opportunity that you discover through your work at Klaviyo, including access to information or company resources (unless Klaviyo has first reviewed and declined the opportunity)
- Don't use Klaviyo's property, information, or your position for personal gain
- Don't compete with Klaviyo directly or through other means



Employees, officers, and directors should seek to protect Klaviyo's assets, digital and physical. Theft, carelessness and waste have a direct impact on Klaviyo's financial performance. We must use Klaviyo's assets and resources solely for legitimate business purposes of the Company and not for personal benefit or the benefit of others.

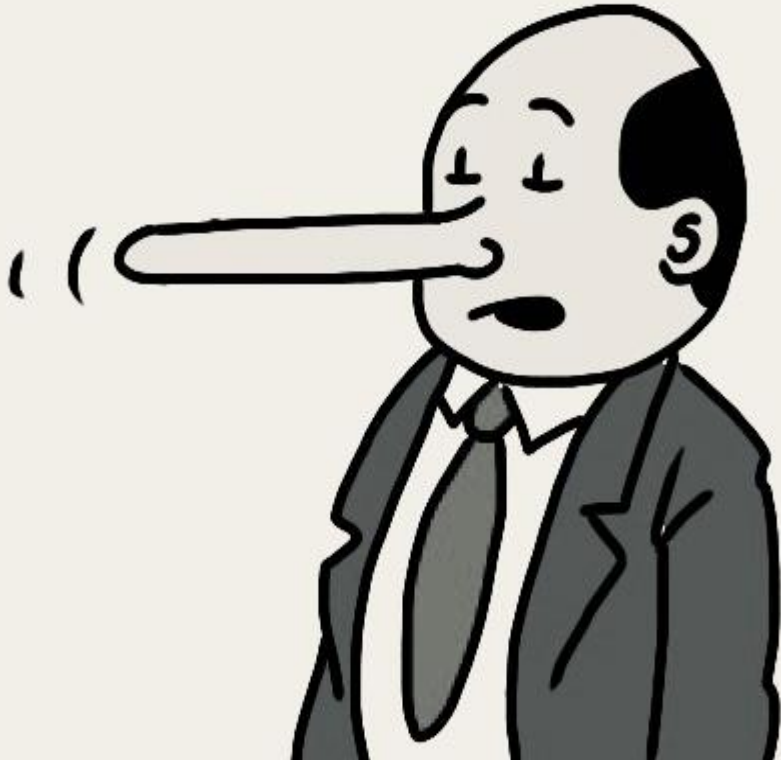
A woman with dark hair, smiling, wearing a yellow short-sleeved shirt and a grey apron. She is holding a tablet computer in front of her. She is standing in what appears to be a cafe or restaurant, with yellow chairs and tables visible in the background.

Our Responsibility to our

Customers

Put customers first.

We work hard to earn and keep each customer's trust through products and experiences that improve their lives and speed their path to success. We do this while maintaining the highest ethical and professional standards.



Fair Dealing

What we say matters. Employees should aim to deal honestly, ethically, and fairly with Klaviyo's partners, suppliers, customers, and competitors.

Statements regarding Klaviyo's products and services must not be untrue, misleading, deceptive, or fraudulent.

You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.



Political Contributions/Gifts -

Business contributions to political campaigns are strictly regulated by federal, state, provincial, and local law in the U.S. and many other jurisdictions. Accordingly, all political contributions proposed to be made with Klaviyo's funds must be coordinated through and approved by the Compliance Officer or their designees. Employees may not, without the approval of the Compliance Officer or their designees, use any Company funds for political contributions of any kind to any political candidate or holder of any national, state, or local government office. Employees may make personal contributions, but should not represent that they are making contributions on Klaviyo's behalf. Specific questions related to this restriction should be directed to the Compliance Officer or their designees.

Gifts, Travel, and Entertainment

There are times during the course of business that employees are required to entertain certain business associates, including customers, agencies, vendors, suppliers, etc.

Check with your People Leader before incurring business meals and entertainment expenses to help ensure the activity clearly benefits Klaviyo and furthers the Company's mission.

For more information, please review our [Employee Travel & Expense Policy](#).



Privacy

We're successful when our customers trust us to protect their privacy. We honor privacy choices by using customer data to provide the services customers have agreed to. Maintaining their trust requires that each of us respect and protect the privacy and security of their information.

Part of treating each other respectfully is respecting the privacy and the confidentiality of personal employee information. Employee personal information may only be used for legitimate business purposes or as needed to comply with the law. Use care when you provide personal information to anyone outside Klaviyo and limit access to authorized individuals.

Please review our [Privacy Policy](#) and our [Data Processing Agreement](#) for more details on how we process and protect the information of our customers, prospects, partners, vendors, and others.





Winning with

Integrity

Klaviyos believe that everyone deserves a fair shot at success. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules, and regulations and to ask for advice when you are uncertain about them. This helps us build trust with our customers, partners, vendors/suppliers, and governments and contribute to making the world more equitable.

Anti-Bribery Laws

It's simple: we don't bribe. **Ever.** We expect that all employees and Board members comply with all laws, rules, and regulations applicable to Klaviyo wherever it does business. Please review our [Anti-Corruption & Anti-Bribery Policy](#) for more information.

Side Agreements and Other Improper Payments

Klaviyo does not permit or condone kickbacks or other improper payments, transfers, or receipts. No employee should offer, give, solicit, or receive any money or other item of value for the purpose of obtaining, retaining, or directing business or bestowing or receiving any kind of favored treatment.

International Trade Control

Many countries regulate international trade transactions, such as imports, exports, and international financial transactions and prohibit boycotts against countries or firms that may be "blacklisted" by certain groups or countries. Klaviyo's policy is to comply with these regulations and prohibitions, even if compliance may result in the loss of some business opportunities. Employees should learn and understand the extent to which international trade controls apply to transactions conducted by the Company. Please review our [Anti-Corruption & Anti-Bribery Policy](#) for more information.





Books and Records

We make full, accurate, and timely financial disclosures in reports and documents we submit to government agencies and in other public statements. Accurate information is essential to Klaviyo's ability to meet its legal and regulatory obligations.

All Company books, records, and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and principles and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

Quality of Public Disclosures

It is the policy of Klaviyo to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission and in other public communications.

Insider Trading

Employees, officers and directors who have material non-public information about Klaviyo or other companies, including our suppliers, partners and customers as a result of their relationship with the Company are prohibited by law and Company policy from trading securities of the Company or such other companies, as well as from communicating such information to others who might trade on the basis of that information. To help ensure that you do not engage in prohibited insider trading and avoid even the appearance of an improper transaction, the company has adopted an Insider Trading Policy, which is distributed to officers, directors, and employees and is also available from the Legal department.

If you are uncertain about the constraints on your purchase or sale of any Company securities or the securities of any other company that you are familiar with by virtue of your relationship with Klaviyo, you should consult with the Compliance Officer or their designees before making any such purchase or sale.



Transparency and **Accountability**

One of our greatest strengths at Klaviyo is our ability to be transparent with each other. In order to maintain this, we must continue to commit to protecting our confidential information.





1 Confidentiality

We must maintain the confidentiality of confidential information entrusted to us by Klaviyo or other companies, except when disclosure is authorized by a supervisor or legally mandated, as advised by Klaviyo's Compliance Officer or their designees. Unauthorized disclosure of any confidential information is prohibited. Employees should take appropriate precautions to ensure that confidential or sensitive business information is not communicated within our company except to employees who have a need to know such information to perform their responsibilities for the Company. Employees also must abide by any lawful obligations they have to former employers, including restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company, and non-competition obligations.

2 Third Parties

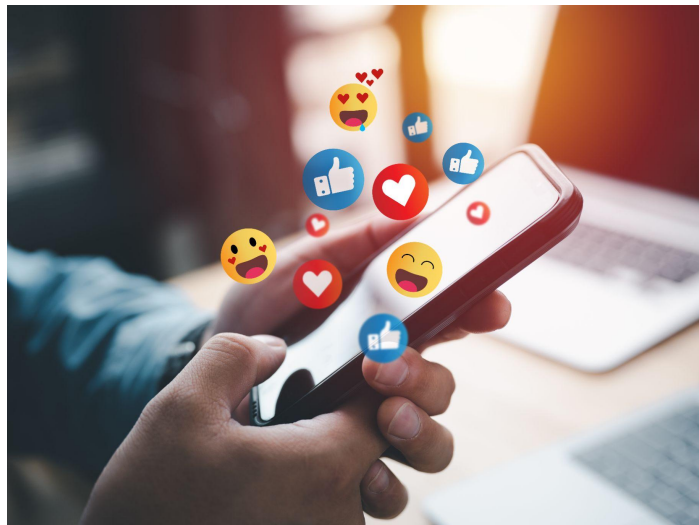
Third Parties may ask you for information concerning the Company. Subject to the exceptions noted elsewhere on this slide, employees, officers, and directors (other than the Company's authorized spokespersons) must not discuss internal Company matters with, or disseminate internal Company information to, anyone outside the Company, except as required in the performance of their Company duties and, if appropriate, after a confidentiality agreement is in place.

3 Public Relations

Inquiries concerning Klaviyo may be received from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers, and dealers), and security holders, among others. All responses to inquiries on behalf of Klaviyo must be made only by our Company's authorized spokespersons. If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to Klaviyo's Public Relations department at press@klaviyo.com. Klaviyo's policies with respect to public disclosure of internal matters are described more fully in Klaviyo's Global Speaking and Media Policy, which is available from the Company's Legal department.

Social Media

When we communicate with external audiences (e.g., on social media, with news outlets, customers, and other stakeholders), it's important that our communications are accurate, consistent, timely and conform to the highest standards of quality and trust.



Expectations of Klaviyo Conduct on Social Media

Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards involved. Keep in mind, any conduct that adversely affects your job performance, the performance of your teammates, or otherwise adversely affects customers, suppliers, people who work on behalf of Klaviyo or Klaviyo's legitimate business interests may result in disciplinary action up to and including termination.

When engaging in social media, Klaviyo has specific expectations of your conduct and the information you share as it relates to your fellow teammates, which are outlined below:

Appropriate Conduct . Under no circumstances should harassing, hostile, malicious, false, or discriminatory comments be made about Klaviyo colleagues on social media sites. Personal blogs and websites should never be used to attack or abuse colleagues; this applies to teammates' social media activities, whether during or outside the work hours or physical locations.

Connection with Teammates . Teammates are free to accept or ignore requests to be connected (e.g., "friending" on Facebook or "following" on Instagram) on social media sites by fellow Klaviyos, whether supervisors, co-workers, or direct reports. Managers should be sensitive to and consider how accepting an invitation from a direct report may be interpreted by that direct report and others on the team before accepting such requests, and should generally refrain from initiating requests with direct reports, as they may feel pressure to accept.

For more information on Social Media use as well as on how to communicate about and reference Klaviyo externally please review our Global Media Policy.

Disciplinary Actions - We all have the responsibility to uphold the standards listed in our Code. Disciplinary measures for violations of the Code of Conduct are determined in Klaviyo's sole discretion, and may include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution. Disciplinary measures may be combined, may not follow a specific progression, and may not occur in every circumstance.

Investigations - During an investigation, Klaviyo will try to investigate if misconduct has occurred, respond in a timely manner, and make changes or recommendations. We will do our best to keep reports and investigations confidential to the extent possible, consistent with the need to conduct an adequate investigation and provide a fair process to anyone accused of misconduct. There may be a time when you are asked to assist with an investigation. In such cases, you are expected to cooperate and not interfere with the investigation, offer false information, or alter or destroy records. If you refuse to participate in such an investigation or deliberately provide false or misleading information during an investigation, you may be subject to disciplinary action, which may include termination of employment.

Anonymity

When reporting suspected violations of the Code, Klaviyo prefers that you identify yourself in order to facilitate our ability to take appropriate steps to address the report, including conducting any appropriate investigation. However, we also recognize that some people may feel more comfortable reporting a suspected violation anonymously. If you wish to remain anonymous, you may do so, and we will use reasonable efforts to protect your confidentiality subject to applicable law, rules, or regulation or to any applicable legal proceedings. However, in the event the report is made anonymously, we may not have sufficient information to look into or otherwise investigate or evaluate the allegations in a fulsome manner. In all cases, we ask that you provide as much detail as possible to permit Klaviyo to evaluate the report fully, and, if appropriate, commence and conduct an investigation.



Klaviyo's management, under the supervision of Klaviyo's board of directors (the "Board") or a committee thereof (including its Audit Committee where appropriate), will monitor compliance with the Code, and, when appropriate, will impose and enforce appropriate disciplinary measures for violations of the Code. Klaviyo's management will periodically report to the Board or a committee thereof on these compliance efforts, including, without limitation, periodic reporting of alleged violations of the Code and the actions taken with respect to any such violation. The Board has delegated day-to-day responsibility for administering and interpreting the Code to a Compliance Officer or their designees. Klaviyo's Chief Legal Officer has been appointed the Company's Compliance Officer under this Code.

This Code is not intended to reduce or limit the other obligations you may have to Klaviyo. Instead, the standards in this Code should be viewed as the *minimum standards* that the Company expects from our directors, officers and employees in the conduct of Klaviyo's business.

Klaviyo may update the Code from time to time and will ask you to review and sign or otherwise acknowledge the Code on a periodic basis. A copy of the Code will be delivered to directors, officers, and employees upon beginning service at Klaviyo, and is available to all current directors, officers and employees at any time. Updates of the Code, when adopted, will be promptly supplied to directors, officers, and employees. No waiver of any provisions of the Code for the benefit of a director or an executive officer shall be effective unless approved by the Board or a committee thereof and, if required, will be promptly disclosed to Klaviyo securityholders in accordance with United States securities laws and NYSE rules and regulations. Any waivers of the Code for other employees may be made by the Compliance Officer or their designees, the Board, or a committee thereof. All amendments to the Code must be approved by the Board or a committee thereof.

Questions or Concerns?

Email:

integrity@klaviyo.com

Anonymous Helpline:

[**Klaviyo.ethicspoint.com**](https://klaviyo.ethicspoint.com)

Mail:

Klaviyo Legal Compliance
125 Summer St. Floor 6
Boston, MA 02110

Latest version of the Code approved by the Board and effective as of November 3, 2025.