

# US Political Contributions and Expenditures Policy (December 2024)

### **Philosophy**

At Match Group, passion drives us in our pursuit to build and integrate technology that will bring people together. Public policy decisions can have a significant impact on our success in this pursuit. We participate in the political process to help shape public policy and government actions that are consistent with our values and business objectives.

We also support officials, candidates and politically oriented organizations that promote policies that are aligned with our priorities and that we believe will have a positive impact on our business and the communities we serve.

The focus of our advocacy includes trust and safety, matters associated with antitrust and app distribution ecosystem reform, data privacy and protection, intermediary liability, reproductive rights and access to appropriate health care, online dating, and the rights of the LGBTQIA+ and other marginalized communities. We review and may reprioritize our advocacy focus as necessary.

We believe in the value of active participation in policy conversations to further the interests of our company and its stakeholders. This Political Contributions and Expenditures Policy describes how Match Group participates in public debate in the United States.

#### **Corporate political activity**

Where permitted by law, Match Group may contribute to political candidates, parties and committees, as well as 527 groups and ballot initiatives. Consistent with federal law, we do not contribute corporate funds to federal candidates, national political party committees or other federal political committees. Match Group does not have a political action committee.

Like most major companies, Match Group may hold membership in certain trade and industry associations whose support we believe will help advance policy objectives important to us and where we believe Match Group and the communities we serve would benefit from our participation in the discussions about those policy issues. In some cases, trade associations to which Match Group belongs engage in government advocacy. Although we may be in agreement with certain positions the associations take on public policy issues, our membership in a

particular trade association does not necessarily indicate agreement with all of the association's views or the views of other members.

Match Group may also make donations to 501(c)(4) social welfare and other tax-exempt organizations. Some of the groups that we support engage in political activities. While we may contribute to these organizations, we do not exercise control over them, and we may not agree with all the positions of each organization.

Occasionally, an association or organization that we support will take a position that differs from ours, and in those cases, we may engage with the organization to express our views. We monitor the use of our dues or payments to trade associations and other organizations for consistency with Match Group's values and business interests.

#### **Internal governance**

Match Group's Senior Vice President, Government Relations and Policy<sup>1</sup> oversees political activity and expenditures, including any direct or indirect contributions or expenditures on behalf of or in opposition to a candidate for public office or referenda, any payments made to trade associations or other tax-exempt entities used for influencing a political campaign, and any direct or indirect political expenditure that must be reported to the Federal Election Commission, Internal Revenue Service, or state disclosure agency.

Use of company funds for this political activity requires approval in advance by Match Group's Chief Executive Officer, President, or Chief Financial Officer, which we refer to in this policy as our "Political Spending Approval Officers". In determining whether to approve a request to make a contribution, Match Group's Political Approval Officers may examine several factors, including, but not limited to, alignment with Match Group priority policies, values, and initiatives; public statements of officials; interests of our users and other impacted communities; and furtherance of laws, rules, and regulations that would be beneficial to Match Group and to our users.

Match Group's Government Relations team, in consultation with internal and external legal counsel as appropriate, regularly reviews our political contributions and expenditures to ensure compliance with all applicable laws, regulations, reporting requirements, and this Political Contributions and Expenditures Policy.

All political contributions are made to promote the interests of Match Group, without regard for the personal political views or interests of our executives or individual employees. No contribution is made to influence or reward an official act, to improperly obtain or retain business, or to improperly gain a financial or other advantage.

<sup>&</sup>lt;sup>1</sup> Political activity and expenditures are overseen directly by Match Group's President pending the filling of a vacancy in this position.

#### **Independent expenditures**

Any independent expenditure (for example, advertisements advocating for the election or defeat of a candidate) that Match Group makes must be approved by our Political Spending Approval Officers.

#### Disclosure

In the interest of transparency for our stockholders and other stakeholders, we will voluntarily post semiannually on our website, beginning with expenditures made in the first half of 2024, our corporate contributions to political candidates, parties and committees and 527 groups, payments made to influence the outcome of ballot measures, and independent expenditures made in direct support of or opposition to a political campaign. The semiannual report will also disclose the portion of our annual dues, if any, that is non-deductible under Section 162(e)(1) of the Internal Revenue Code for any trade association that received at least \$25,000 in dues from us during the most recently completed calendar year. We do not control how our dues are spent and some trade associations may use a portion of Match Group's membership dues for lobbying or election-related purposes; we will include this information in our report to the extent it is made publicly available by the association.

## **Oversight**

This policy is approved and adopted by the Nominating and Corporate Governance Committee of our Board of Directors, which is comprised exclusively of independent directors. The Committee will review this policy annually. The Committee will also receive quarterly reports of all political activity approved by our Political Approval Officers pursuant to this Political Contributions and Expenditures Policy, which includes political contributions and membership dues for trade associations and other tax-exempt organizations. Our full Board of Directors will receive these reports annually.