



Code of Business Conduct & Ethics

SEPTEMBER 2025

TABLE OF CONTENTS

Our Shared Commitment	4	We Safeguard Our Company	13
We Promote Corporate Compliance and an Ethical Workplace	6	Avoid Conflicts of Interest	14
Act Honestly, Lawfully, and Ethically	7	Protect the Company's Confidential Information	16
Respect Each Other	8	We Always Strive to Do the Right Thing	18
Guidelines on How to Make Good Decisions	9	Corporate Opportunity	19
Responsibility to Report Concerns, Investigations, and Protection from Retaliation	10	Always Follow the Law	20
Reporting Violations	10	Build Trust with Our Users	21
Investigating Reports of Violations	11	Partner with Integrity	22
Protection for Reporting Violations	12	Avoid Bribery	23
Consequences for Violations	12	Avoid Insider Trading	25
		Disclosure, Financial Reporting, and Accounting	26
		Waivers of the Code of Business Conduct and Ethics	28
		Corporate Citizenship	29

LETTER FROM OUR CEO

Spencer Rascoff



At Match Group, we are all focused on sparking meaningful connections for our users. Every decision we make shapes trust in our brands, and with each other.

The policies laid out here in our Code of Business Conduct and Ethics cover a lot of important detail, but fundamentally they are all about doing the right thing for our users and employees.

If something feels off, say so right away. If you hit a gray area, lean on your manager, your People business partner, our Legal team, call the Ethics hotline, or you can always reach out to me directly.

We are all committed to the mission of our company and proud of the products we build, and we also have to be proud of how we build them. Living the principles set out in the Code is the foundation for long-term business success and the kind of positive workplace culture where people can grow, innovate, and thrive.

Spencer
CEO, Match Group



Our Shared Commitment



Our Shared Commitment

This Code of Business Conduct and Ethics reflects the commitment of Match Group, Inc., including all of our brands, to conduct its business affairs to the highest ethical standards.

This includes in accordance with not only the requirements of applicable law, but also standards of corporate compliance and ethical conduct that will maintain and foster our reputation for honest and straightforward business dealings. The standards in this Code may be further explained or implemented through policies, including those relating to specific areas of our business. If a law conflicts with a policy or this Code, you must comply with the law.

This Code and related policies are available from the Match Group People and Legal Departments. This Code applies to all employees of Match Group and its subsidiaries and all members of the board of directors of Match Group, Inc.

You are strongly encouraged to consult with your manager or the Match Group Legal Department if you have any questions concerning the requirements or interpretation of this Code.

Those who violate the standards in this Code may be subject to disciplinary action, including termination of employment. If you are involved in, or aware of, a situation which you believe may violate or lead to a violation of this Code, please follow the guidelines described in Sections 3 and 4.



We Promote Corporate Compliance and an Ethical Workplace



We Promote Corporate Compliance and an Ethical Workplace

1 Act Honestly, Lawfully, and Ethically

Our reputation for acting ethically is built one decision at a time. Your conduct in performing your duties on behalf of the Company must always be honest, lawful and in accordance with the highest ethical and professional standards.

The requirement of honest, lawful, and ethical conduct is broad. For that reason, this Code does not cover every issue that may arise, but instead sets out basic principles to help guide you. When in doubt about how to proceed in a specific situation, discuss it with your manager, your People Business Partner or the Match Group Legal Department.





We Promote Corporate Compliance and an Ethical Workplace

2 Respect Each Other

We treat each other with respect, dignity and fairness. We are committed to and celebrate equality and diversity within our workforce. Consistent with our commitment to equality and diversity, we avoid unlawful discrimination of any kind. At the same time, we value ensuring equal employment opportunities to our qualified applicants and employees. We also respect everyone's human rights and dignity.

To help drive and maintain equality and non-discrimination at our Company, we foster and encourage transparency and open communications by and with our employees.

We expect our managers to:

- Lead by example - always do the right thing.
- Encourage their team(s) to speak up when there is a problem.
- Make sure their team(s) understand the Code, applicable Company policies, and what is expected of them.
- Escalate any matter that may indicate a violation of the Code, Company policies, or the law, while complying with local data privacy laws.
- Avoid retaliation against those who speak in good faith and ensure others do not retaliate.



We Promote Corporate Compliance and an Ethical Workplace

3 Guidelines on How to Make Good Decisions

Match Group strives to ensure prompt and consistent action in response to violations or potential violations of this Code.

However, in some situations it is difficult to know whether a violation has or may have occurred. Since we cannot anticipate every situation that may arise, it can be helpful to have some general guidelines to approach a new question or problem.

These are a few to keep in mind:

- **Make sure you are knowledgeable of the relevant facts.** In order to reach the right solutions, we must be as fully informed as possible.
- **When in doubt about your conduct or decision making, ask yourself:** What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have.

Use your judgment and common sense; if something seems or “feels” unethical or improper, it probably is.

- **Clarify your responsibility and role.** In most situations, there is shared responsibility. Are your colleagues informed? Do not hesitate to get others involved and discuss the problem.
- **Always feel free to discuss the problem with your manager.** This is the basic guidance for all situations. In many cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your manager’s responsibility to help solve problems.
- **Ask first, act later:** If you are unsure of what to do in any situation, seek guidance before you act.



We Promote Corporate Compliance and an Ethical Workplace

4 Responsibility to Report Concerns, Investigations, and Protection from Retaliation

The Company is committed to corporate compliance and to the full, prompt, and fair enforcement of the provisions of this Code.

Reporting Violations

If you learn of information suggesting that a violation of this Code has occurred, is occurring, or may occur, you must immediately report it to your manager and, when appropriate, to Match Group's Chief Legal Officer. Reports may also be made through Match Group's confidential and independently operated reporting hotline, EthicsPoint. The hotline is available 24 hours a day, 7 days a week, and allows for anonymous reporting if preferred. You can submit a report by visiting matchgroup.ethicspoint.com or by calling +1(833) 713-0940 (within the U.S., or refer to the website for international numbers).

The failure to report a violation of this Code may itself be considered a violation of this Code.





We Promote Corporate Compliance and an Ethical Workplace

4 Responsibility to Report Concerns, Investigations, and Protection from Retaliation

Investigating Reports of Violations

Upon receiving a report of a possible violation of this Code, Company policy, or the law, the Match Group Legal Department will promptly assess the situation and initiate an investigation if the facts warrant it.

All lawful investigative means and methods may be utilized in the conduct of the investigation. This includes possibly retaining an outside investigator to conduct the investigation.

You must fully and honestly cooperate in any investigation when called upon to do so. A failure to do so may itself be considered a violation of this Code and/or other Company policy.

In conducting and monitoring investigations, the Match Group Legal Department will consult, coordinate, and provide legal advice as appropriate with senior management, the Internal Audit Department, the People Department and the Audit Committee of the Match Group board of directors, and shall seek to ensure that the provisions of this Code are applied and enforced consistently across all employees and across the Company's businesses.



We Promote Corporate Compliance and an Ethical Workplace

4 Responsibility to Report Concerns, Investigations, and Protection from Retaliation

Protection for Reporting Violations

It is a violation of this Code for you, or anyone else associated with the Company, to retaliate in any way against someone who has honestly and in good faith, reported a potential violation.

Prohibited retaliation includes adverse employment actions (such as termination, suspension and demotion), the creation of a hostile work environment, shunning, or any other type of reprisal because of the reporting of a possible violation of this Code.

Consequences for Violations

Based on the Company's assessment of the facts, and following any investigation that may be conducted, appropriate disciplinary action will be imposed if a violation of the Code, another policy or the law has been committed. Disciplinary action may include dismissal, suspension without pay, loss of pay or bonus, loss of benefits, demotion, termination or other action that the Company deems appropriate based on the facts and circumstances of the violation.

Any disciplinary action to be taken against you will be carried out by your manager, the People Department of the applicable business, or the board or directors, as applicable.



We Safeguard Our Company



We Safeguard Our Company

5 Avoid Conflicts of Interest

A “conflict of interest” exists when your personal or private interests improperly interfere with, or is adverse (or appears to be adverse) to, the interests of the Company.

Conflicts of interest may impair or interfere with your performance of your duties to the Company or your ability to act in the Company’s best interests.

Conflicts of interest can arise when you take action or have personal interests that may make it difficult to perform your work for the Company objectively and effectively. Conflicts of interest often arise directly, but may also arise indirectly.

While it is impossible to foresee every potential conflict of interest that could arise, examples of conflicts may include:

- Accepting an excessive gift or entertainment for personal or family use in exchange for providing assurance that the Company will enter into a business contract with the provider of the gift or entertainment.

- Having affiliations or investments in competitors, customers, suppliers, or others who do business with the Company.
- Receiving or having a family member receive an improper personal benefit because of your position in the Company.
- Letting your business decisions be, or appear to be, influenced by personal or family interests, romantic relationships or friendships.

You must be sensitive to potential conflicts and avoid them where possible. The Company respects the privacy of employees and the board of directors and their right to engage in outside activities (which expressly include, in the case of non-employee directors, serving as an executive officer, employee or director of, and/or maintaining a significant direct or indirect beneficial ownership interest in, another entity that is not in competition with the Company), that do not conflict with the interests of, do not interfere with the performance of their duties on behalf of, and do not reflect poorly on the Company.

The Company reserves the right and obligation to determine whether a conflict of interest (or improper appearance of one) exists and to take appropriate action to address it.



We Safeguard Our Company

5 Avoid Conflicts of Interest

Before (i) engaging in any material transaction (including the making of a significant direct or indirect investment in another entity) or accepting an executive officer or director position with a non-profit entity, if it reasonably could create an actual or apparent conflict of interest, or (ii) accepting an executive officer or director position with another for-profit entity, you must provide full and fair disclosure of all relevant facts and circumstances to Match Group's Chief Legal Officer.

After evaluating the reported transaction or relationship, Match Group's Chief Legal Officer will determine whether it reasonably could give rise to an actual or apparent conflict of interest; and if so, will either:

- (i) determine whether any safeguards and measures to protect the Company's interests are appropriate and must be followed, or
- (ii) in the case of members of the board of directors of Match Group, Inc. or Company employees reporting directly to

Match Group's Chief Executive Officer, make a recommendation to Match Group's Nominating and Corporate Governance Committee or Chief Executive Officer, respectively, who will make the final determination.

Any safeguards and measures to protect the Company's interests may include prohibiting the transaction or relationship.

In most cases, anything that would constitute a conflict of interest for you also would present a conflict if it is related to a member of your family. In particular, if you have knowledge that your spouse, parent, child or other close family member works for a firm that does business with, is proposing to do business with, or competes against the Company, Match Group's Legal Department must be advised of the situation in writing as soon as the situation exists and becomes known. Failure to notify the Legal Department may lead to disciplinary action.

Conflicts of interest may not always be clear-cut, so if you have a question, you should speak with your manager and/or the Match Group Legal Department.



We Safeguard Our Company

6 Protect the Company's Confidential Information

The Company relies on you to protect the Company's confidential information, trade secrets, and other proprietary information, ideas and property ("Confidential Information"). You must maintain the Confidential Information you learn about or that is entrusted to you by the Company and its users, business partners, and suppliers. Possession, use or disclosure of Confidential Information is only permitted when it is authorized by the Match Group Legal Department, required by law, or necessary in the course of carrying out your responsibilities as an employee or independent contractor to the Company.

Confidential Information includes all non-public information that Match Group takes reasonable measures to protect and maintain as confidential and that could be of economic value, actual or potential, to competitors and others who do not

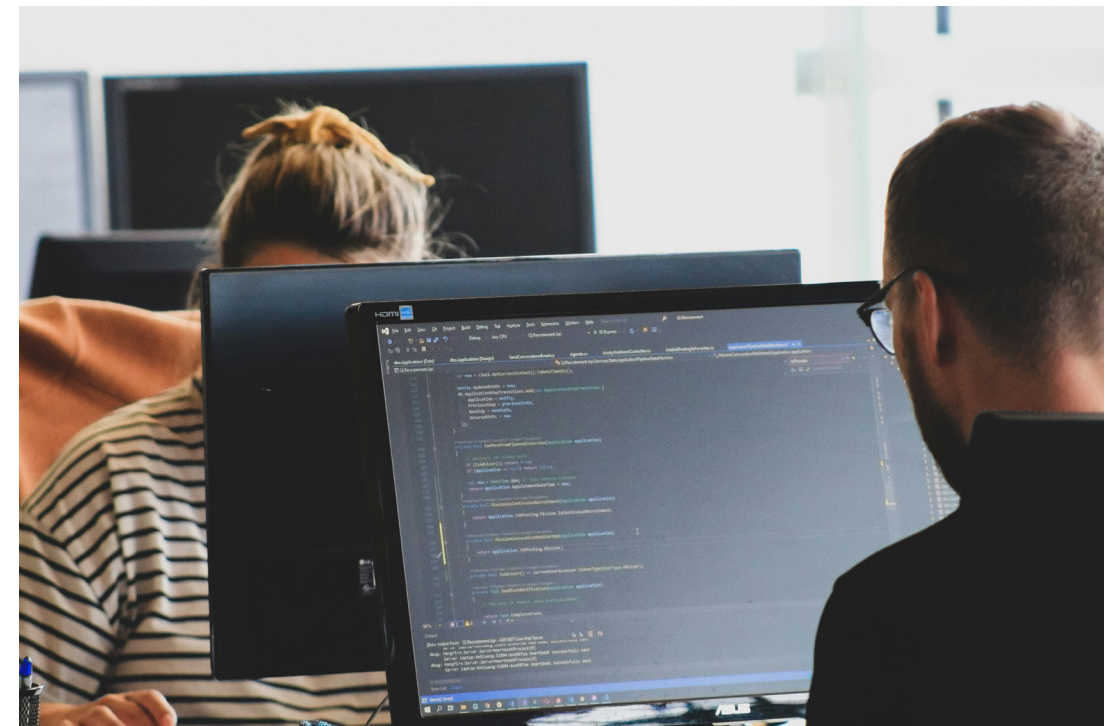
possess or have access to the Confidential Information, or harmful to the Company or its users, business partners or suppliers, if possessed, used or disclosed. Confidential Information also includes non-public information that Match Group's users, business partners, and suppliers take steps to maintain as confidential and have entrusted to us. Your obligation to preserve Confidential Information includes not misappropriating or disclosing trade secrets of the Company, or of its users, business partners, and suppliers that are entrusted to the Company. The Company abides by—and expects you to abide by—the definition of "trade secrets" as defined under the United States Defend Trade Secrets Act of 2016 ("DTSA"), and other applicable federal or state trade secrets laws.



We Safeguard Our Company

6 Protect the Company's Confidential Information

Nothing in this this Code, or in any Company agreement or policy, that protects confidentiality and restricts the disclosure of the Company's Confidential Information prohibits or otherwise impedes you from disclosing Match Group's Confidential Information to an appropriate federal, state or local governmental agency in connection with an investigation, an enforcement action, or a report to the agency regarding potentially unlawful conduct. In addition, under the DTSA trade secrets may be filed under seal in a court proceeding or submitted confidentially and expressly designated "confidential" as part of a government investigation or enforcement action. Apart from the exceptions allowed under the DTSA, SEC Rule 21F-17, and this Section of the Code, your obligations to not possess, use or disclose the Company's Confidential Information—including trade secrets—continue even after employment with or service to the Company ends.





We Always Strive to Do the Right Thing



We Always Strive to Do the Right Thing

7 Corporate Opportunity

You must not take advantage, for yourself or any family member or any company you are connected to, any business opportunity that has been identified by the Company or is being developed or pursued in any of the Company's lines of business, or in which the Company has a current or potential interest.

If you have a question as to whether a given opportunity is covered under this Section of the Code, you should consult with your manager and/or Match Group's Legal Department before taking any action.

However, any member of the board of directors of Match Group, Inc. will not be considered in violation of this Code if a specific opportunity came to their attention through any means not connected with their service to Match Group.

In addition, you may not use Company property, its business, information - including Confidential Information, or your position with Match Group for improper personal gain unrelated to the Company's business.





We Always Strive to Do the Right Thing

8 Always Follow the Law



Complying with the law is the foundation on which Match Group’s corporate compliance and ethical standards are built.

It is Match Group’s policy to be a good and admired “corporate citizen.” This includes complying with antitrust laws and laws that prohibit unfair business practices. This also includes respecting and not interfering with our competitors’ non-compete, non-solicitation, and confidential business information agreements with their current and former employees. Everyone subject to this Code must comply with applicable governmental laws, rules and regulations. Reasons such as “everyone does it” are unacceptable excuses for violating this requirement of this Code.

Although you are not expected to know the details of all applicable laws, it is important to know enough to determine when to seek advice from your manager, the Match Group Legal Department or other appropriate personnel. Any suspected or actual violation of any applicable law, rule or regulation should be reported immediately to your manager or the Match Group Legal Department.



We Always Strive to Do the Right Thing

9 Build Trust With Our Users

Our users are our lifblood. Our mission is to make meaningful human connections for them.

While doing so, we strive to (a) honor their preferences; (b) keep them safe; and (c) protect their privacy. We do so by continually leveraging new technologies and AI. For example, we employ tools to detect fraudulent account activity and employ a wide-range of safeguards to protect our users' confidential information, data and privacy.

Out of respect for our users– and as the right business approach– we expect at all times that we strive to remain truthful and transparent in our dealing with our users. If a dispute arises, our approach is to treat our users honestly and fairly.





We Always Strive to Do the Right Thing

10 Partner With Integrity



We are smart and selective about the companies and individuals with whom we choose to partner and do business.

We conduct appropriate and thorough due diligence before we select a company or individual to partner with Match Group. Not only must our business partners have the necessary business knowledge and experience to help strengthen our business, they must engage in honest, lawful, and transparent business practices.

Consistent with our commitment to our users and employees, we seek to partner with businesses and individuals who adhere to applicable non-discrimination, health and safety, fair business competition, environmental, and labor and employment laws. We also seek business partners who share our values toward diversity and equal employment opportunity.

Before agreeing to and entering into any contract with a business partner, the contract must first be vetted and approved through Match Group's established contract review and approval process.



We Always Strive to Do the Right Thing

11 Avoid Bribery

You must comply with applicable laws against bribery and improper payments to government officials.

→ **Penalties.** The Company will dismiss anyone guilty of violating applicable laws against bribery and improper payments to government officials. Furthermore, violating these laws can result in the imposition of prison sentences on those involved, plus severe financial consequences (in the millions of U.S. dollars) for the Company, and possibly reputational injury.

- **Applicable bribery and improper payments laws.** The term “Applicable bribery and improper payments laws” means applicable laws that criminalize bribery and improper gifts or payments to government officials and candidates for office.
- The term “government officials” includes all government personnel. You should take note that in many countries, government personnel operate services that, elsewhere, may be in the private sector (for example, medical and transportation facilities and schools).
 - In addition to local bribery/improper payments laws, the U.S. Foreign Corrupt Practices Act reaches Company operations worldwide and criminalizes bribery and improper payments to **non-U.S.** government officials. Similarly, the UK Bribery Act reaches certain gifts or payments to government (and even non-government) recipients **outside of the United Kingdom.**



We Always Strive to Do the Right Thing

11 Avoid Bribery

Therefore, you must not:

- make, offer or promise a payment or gift to anyone who could influence (even indirectly) a public official to do or refrain from doing something for the Company. “Payment or gift” applies to client entertainment and marketing give-aways. However, de minimis expenditures for promotional activities and hospitality, or token gifts, to government personnel may be permissible if the applicable government regulations allow, but you should check in advance with the Match Group Legal Department or your manager;
- make, offer or promise a “facilitation payment” or “kickback” to a government official. The term “facilitation payments” means small payments made to expedite a routine government service and the term “kickbacks” means secret rebates;

- use an agent or third party to make an improper payment, gift, offer, facilitate payment or kickback to a government official; and
- fail to declare, report or account for payments to government personnel in a way that violates applicable law or accounting standards.

Even payments, gifts, offers, facilitation payments and rebates to non-government parties must be legal, appropriate and consistent with Company policies and applicable law and in certain cases could be prohibited. Again, the UK Bribery Act prohibits certain gifts or payments to **non-government** recipients **outside of the United Kingdom**. You should check in advance with the Match Group Legal Department or your manager.

You may contribute to political campaigns in your individual capacity and own name if the contribution is legal, is not tied to, associated with, or publicized in any way in the Company’s name, and is properly reported.



We Always Strive to Do the Right Thing

12 Avoid Insider Trading

If you, as a result of your employment at or other association with the Company, are in possession of material, non-public information about any publicly traded corporation, including Match Group, you may not engage in transactions in the securities of those corporations and should not share that information with anyone who might engage in such transactions. To do so is not only unethical, but also illegal, and could expose you to civil and criminal penalties.

Please read and familiarize yourself with the “Match Group Securities Trading Policy”, which can be found on Central or obtained from the Match Group Legal Department. If you should have further questions in this area, please consult the Match Group Legal Department.





We Always Strive to Do the Right Thing

13 Disclosure, Financial Reporting, and Accounting

The Company is committed to providing full, fair, accurate, timely and understandable disclosure in all reports and documents filed with or submitted to the Securities and Exchange Commission (“SEC”) and in all other public communications made by the Company. All of the Company’s books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company’s transactions and must conform both to applicable legal requirements and to the Company’s system of internal controls. Unrecorded or “off the books” funds or assets should not be maintained unless permitted by applicable law or regulation and brought to the attention of Match Group’s Chief Accounting Officer.

If you learn of any material information affecting or potentially affecting the accuracy or adequacy of the disclosures made by the Company in its SEC filings or other public statements,

you must bring the matter promptly to the attention of a member of the Match Group Disclosure Committee. The Disclosure Committee consists of the Chief Legal Officer of Match Group, the Chief Accounting Officer of Match Group and such other employees of Match Group as may be designated from time to time.

Senior management, including the senior financial officers, of the Company’s businesses must report their respective financial results to senior management of Match Group in a way that enables Match Group to fairly and accurately present the consolidated financial position and the consolidated results of operations and cash flows of the Company. We also account for, maintain, and report our financial performance, expenses, and results in conformity with accounting principles generally accepted in the United States, applied on a consistent basis.



We Always Strive to Do the Right Thing

13 Disclosure, Financial Reporting, and Accounting

If you learn of any information concerning: (i) significant deficiencies or material weaknesses in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data fairly and accurately, or (ii) any fraud, whether or not material, involving management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls, must bring the matter promptly to the attention of a member of the Disclosure Committee.

Upon receipt of any such information, the Disclosure Committee shall investigate the matter, consult with senior management as warranted, confer with the Audit Committee of Match Group's Board of Directors if appropriate, and ensure that any necessary corrective action is taken.

In addition, and pursuant to SEC Rule 21F-17, nothing in this policy, this Code, in any confidentiality agreement or policy, or in any Match Group directive prohibits or impedes you or other individuals from communicating directly with the SEC—including without prior notice to or approval from Match Group—concerning any violation or potential violation of any securities law or SEC rule.



We Always Strive to Do the Right Thing

14 Waivers of the Code of Business Conduct and Ethics

Any waiver of this Code for executive officers or the board of directors may be made only by the Match Group Board of Directors or a properly authorized Match Group Board committee and will be promptly disclosed to Match Group stockholders along with reasons for such waiver as required by law or Nasdaq regulation.



We Always Strive to Do the Right Thing

15 Corporate Citizenship

Match Group strives to be a good corporate citizen, one that develops a reputation for caring about and being involved in the communities in which we conduct our business and where our employees work.

We welcome learning about local and foreign—customs, cultures, and landmarks. We respect and protect human dignity and rights wherever we do business. We oppose all forms of human trafficking and slavery, and we report such conduct to law enforcement officials if and as it comes to our attention.



