

CODE OF CONDUCT & ETHICS

TABLE OF CONTENTS

[Introduction](#)

[Our Core Values](#)

[Demonstrating Our Core Values](#)

[Workplace Respect and Safety](#)

[Diversity, Equity and Inclusion
at TKWW](#)

[Non-Discrimination and Equal](#)

[Employment Opportunity](#)

[Workplace Conduct](#)

[Workplace Health and Safety](#)

[Culture of Open and Honest
Communication](#)

[Corporate Social Responsibility](#)

[Environmental Sustainability](#)

[Diversity, Equity and Inclusion
in Our Community](#)

[Community Support and](#)

[Engagement](#)

[Human Rights](#)

[Compliance and Integrity](#)

[Integrity](#)

[Bribery and Corruption](#)

[Fraud](#)

[International Trade](#)

[Competition](#)

[Fair Dealing](#)

[Public Disclosures](#)

[Material Non-Public Information](#)

[Corporate Recordkeeping](#)

[Insider Trading](#)

[Confidentiality, Privacy and Data Security](#)

[Privacy and Data Security](#)

[Confidential and Proprietary Information](#)

[Conflicts of Interest and Business Courtesies](#)

[Conflicts of Interest](#)

[Corporate Opportunities and Outside
Work](#)

[Business Courtesies: Gifts, Gratuities,
Meals and Entertainment](#)

[Reporting and Anti-Retaliation](#)

[Complaint Reporting and Investigation
Procedures](#)

[Compliance Hotline](#)

[Protection Against Retaliation](#)

[Questions](#)

CODE OF CONDUCT & ETHICS

Introduction

This Code of Conduct and Ethics (the “Code”) and our core values describe legal, ethical and regulatory requirements and policies that govern our global business. This Code and our core values apply to everyone at The Knot Worldwide Inc. and its global subsidiaries (collectively, “TKWW” or the “Company”), including our employees, officers and directors. We also expect our contractors, suppliers, consultants and agents to abide by this Code and our core values in connection with their work for TKWW.

This Code doesn’t cover every situation you might face. You should also read the Company’s other policies and guidelines, including our Employee Guide and the policies located on your local WorldWide Web. In addition, this Code includes information on how to ask for guidance or report violations when needed. There is always someone to help if you have questions or need guidance. Please ask your manager or contact the Legal Department at legal@theknotww.com.

Our Core Values

At TKWW, our core values represent who we are as a Company. We expect everyone at TKWW and those working with TKWW to embody these core values.

- **We dream big.** We iterate and experiment to drive innovation.
- **We love our users.** Our global community is at the center of everything we do.
- **We do the right thing.** Respect, fairness and inclusion strengthen our team.
- **We hustle every day.** We favor urgency and own our outcomes.
- **We win together.** Our people are at the heart of our success and we play as a team.

Demonstrating Our Core Values

At TKWW, **#WeDoTheRightThing** and that includes demonstrating our core values in everything that we do. This means that we all have certain obligations to act ethically and in compliance with Company policies and applicable laws and regulations, honoring others’ trust and confidence in our business.

As TKWW employees, we must honor these commitments by, among other things:

- Reading and understanding this Code and other Company policies and guidelines, including your Employee Guide
- Making decisions consistent with those policies and guidelines
- Complying with the applicable laws and regulations in the location(s) where you work
- Completing all of your required compliance and other employee trainings in a timely manner Speaking up when you see or hear something wrong and reporting any possible violations of this Code or any other Company policies and guidelines

CODE OF CONDUCT & ETHICS

Contacting the Legal Department if you are contacted by any government agency and responding truthfully, promptly and accurately to legitimate government enquiries.

People managers have additional responsibilities, including:

- Making sure your department or team are complying with this Code and other Company policies and guidelines
- Promoting a culture of open and honest communication, where everyone feels comfortable speaking up and raising any concerns or questions
- Consistently enforcing this Code and other Company policies and guidelines, and
- encouraging good faith reporting of any issues
- Ensuring that your department or team maintains appropriate compliance controls
- Strictly enforcing TKWW's anti-retaliation policy, which is described further below in
- "[Reporting and Anti-Retaliation](#)" and in the Employee Guide

Workplace Respect and Safety

Diversity, Equity and Inclusion at TKWW

TKWW is committed to diversity in our teams, to give our team members a representative voice. Success will be a diverse and equitable workplace where [#WeWinTogether](#). All employees have an obligation to complete unconscious bias, anti-discrimination and harassment and other similar trainings as required by the Company in a timely manner. In addition, we expect everyone at TKWW to do their part to uphold these values in our workplace on a daily basis, including through inclusive hiring processes and bias-mitigating strategies.

Non-Discrimination and Equal Employment Opportunity

TKWW provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex (including pregnancy, sexual orientation, gender identity or gender expression), national origin, age, disability, genetic information or any other protected category or class. We believe that everyone should be treated with respect and dignity, regardless of their personal characteristics. We comply with applicable laws governing non-discrimination and nonharassment in employment in every location in which the Company operates or has employees. We expressly prohibit any form of workplace harassment, bullying or threats based on any protected category or class. See your Employee Guide for additional details.

Workplace Conduct

TKWW is committed to having a respectful, safe and secure working environment. The Company does not tolerate bullying or harassing behavior of any kind. This zero tolerance policy

CODE OF CONDUCT & ETHICS

extends to insulting, hurtful, threatening or abusive comments, threats, or emotional, physical or sexual harassment. Any such behavior will be subject to disciplinary action, up to and including termination. Please see your Employee Guide for more information. If you experience or observe any behavior which you think violates this policy, you should immediately contact your manager and/or HRBP, or report this behavior using the reporting procedures described later in this Code under “[Reporting and Anti-Retaliation.](#)”

Workplace Health and Safety

TKWW is committed to providing a clean, healthy and safe work environment. Employees have a responsibility for maintaining a clean, safe and healthy workplace by following all applicable safety and health rules and practices. This includes being familiar with, and abiding by, all of the requirements of any crisis management or business continuity plans that the Company puts in place at any given time. Everyone at TKWW should be prepared to adapt to changing working conditions and contribute to the continued success of our business.

The Company has a zero tolerance policy for violence or threatening behavior in the workplace. Possession of weapons, including knives and firearms, is prohibited on TKWW property. TKWW also expects you to report to work in a condition to adequately perform your duties during working hours, including in a condition free from the influence of illegal drugs or alcohol. Please see your Employee Guide and your office-specific policies for more information.

You should immediately report any behavior or activity that threatens the health and safety of employees to your local Office Experience team, your HRBP or your manager. If it is an emergency, please contact your local emergency services.

Culture of Open and Honest Communication

#WeWinTogether and at TKWW everyone should feel comfortable to speak his or her mind, and to raise any concerns. Managers, officers and directors have a responsibility to create an open and supportive environment where everyone feels comfortable raising such questions. We respect the diversity of viewpoints, beliefs and values present in our workplace. This also means that sometimes, we must refrain from expressing opinions, making comments or taking stances at work on sensitive topics that might interfere with the ability of you or your colleagues to do their jobs.

TKWW respects everyone’s privacy and expression outside of work. However, in some circumstances, behavior outside of work could rise to a level that impacts your ability to perform your job, our workplace, or TKWW’s legitimate business interests. Please see our Employee Guide, including our social media and anti-harassment policies, for more information.

CODE OF CONDUCT & ETHICS

Corporate Social Responsibility

Environmental Sustainability

At TKWW **#WeDoTheRightThing**, and that includes doing our part to protect our environment. As a Company, we maintain a focus on reducing our environmental impact, including through vendor and consumer education, responsibly managing consumption and waste across our offices and operations, identifying and managing climate risks and opportunities and working to reduce our carbon footprint and energy usage. We support TKWW employees' efforts to combat climate change and reduce our environmental impact, including through employee resource groups, Company green and charitable initiatives.

Diversity, Equity and Inclusion in Our Community

TKWW's strong commitment to diversity, equity and inclusion extends not just to our employees, but also to our community. **#WeLoveOurUsers** and that includes welcoming all couples—no matter their race, color, religion, sex (including pregnancy, sexual orientation, gender identity or gender expression), national origin, age, disability, genetic information or any other protected category or class—and standing by our core belief of inclusivity. We expect everyone at TKWW and in our community to be committed to awareness, advocacy, education, partnerships and the willingness to be uncomfortable in the interest of promoting lasting, positive change to combat social injustice and inequity.

Community Support and Engagement

We are committed to giving back to our global community. Whether through volunteering, charitable donations, pro bono partnerships or workplace events, we empower our employees to find ways to support our communities. TKWW sponsors such events or charitable activities from time to time and encourages all willing employees to participate. Any such activities in which you participate that are not Company-sponsored must be completed outside of your work hours and with your own resources. In addition, when undertaking any political, social or charitable advocacy, TKWW employees, officers and directors must make clear that they are engaging in these activities in their own capacity and not as a representative of TKWW. The Company prohibits any lobbying or similar activities on its behalf without the prior review and authorization of the Legal Department.

Human Rights

TKWW respects and promotes human rights in all of the places we do business, regardless of local norms. We expect everyone at TKWW to comply with all applicable laws and act in accordance with international human rights standards and principles, including the United

CODE OF CONDUCT & ETHICS

Nations (UN) Guiding Principles on Business and Human Rights. Further, we expect those we do business with to uphold these same principles. If you observe anything that you believe violates these fundamental principles, you should immediately report it using the procedures described in this Code.

Compliance and Integrity

Integrity

Our Core Value of **#WeDoTheRightThing** means that TKWW is committed to operating with integrity and inspiring trust in our Company and our offerings. Our commitment to integrity begins with complying with laws, rules and regulations where we do business. This Code describes the obligations that everyone at TKWW has in order to comply with the laws, rules and regulations that apply to our global business.

The obligations described in the Code are not the only compliance obligations we have, and each of us must have an understanding of the Company policies, laws and regulations that apply to our specific roles. If you are unsure, you should ask for guidance from your manager or the Legal Department. Everyone at TKWW is responsible for preventing violations of law and is expected to use the reporting procedures outlined in this Code if you see possible violations.

Bribery and Corruption

TKWW has a zero tolerance policy for any form of bribery or corruption. This applies in every place we do business, regardless of local norms. We must comply with all applicable anti-bribery laws, including the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, which prohibit giving, authorizing, accepting or receiving bribes (or kickbacks) in connection with our business. Any violation of these laws, including the FCPA and UK Bribery Act, could result in serious criminal and civil penalties (including jail time and monetary fines) for TKWW, its directors, its officers and/or any employees involved.

TKWW employees, or anyone acting on behalf of TKWW, are prohibited from, among other things:

- Providing, offering or authorizing anything of value (whether money or otherwise) to a “Government Official” (see definition below) or private party (e.g., a vendor, supplier, contractor or customer) in order to obtain or retain business, to gain influence or favorable treatment or to obtain any other advantage. This includes paying or offering to provide facilitating payments to secure or expedite official actions or approvals, even in places where this type of payment may be culturally customary.
- Receiving or requesting, directly or indirectly, anything of value from third parties (e.g., vendors, suppliers, contractors or customers) for any improper or corrupt purpose.

CODE OF CONDUCT & ETHICS

- Employing any third-party agent who you know, or reasonably should know, will make improper or corrupt payments on TKWW's behalf. This means that TKWW employees must, as part of the contracting process, appropriately vet any third parties working on our behalf to ensure that they will comply with our zero tolerance policy and anti-bribery laws.

“Government Official” means any person acting in an official capacity on behalf of any foreign government, agency, department, regulatory authority or instrumentality. E.g. national, state or local government employees, political candidates, political parties, employees of government or state-owned enterprises (e.g., government-owned utility companies, properties or airlines) and employees/representatives of quasi-public or nongovernmental organizations (e.g., the UN, NATO or the Red Cross).

Our anti-bribery and anti-corruption policy is overseen by our General Counsel. If you believe that any conduct might violate this policy, please email legal@theknotww.com or report it immediately using the procedures outlined in this Code.

Fraud

“Fraud” occurs when someone engages in a dishonest or deceptive activity in order to gain some financial, personal or other unfair advantage. For example, embezzlement, theft or misuse of Company property, or intentional distortion of expenses or financial statements can all be fraud.

TKWW is committed to preventing and quickly detecting fraud. The Company has certain controls and other procedures in place to prevent and detect fraud as soon as possible and remediate any harm to the Company or its stakeholders. You'll also find more information about fraud in your Employee Guide and in Company-required training. If you suspect fraud or any other dishonest or deceptive conduct which might violate this Code, please report it immediately using the procedures outlined in this Code.

International Trade

We operate internationally and may be subject to certain trade restrictions, sanctions or embargoes of the locations in which we operate, including the U.S., E.U. and U.K. These laws and regulations may restrict us from doing business with, or selling our products or services to, certain countries, governments, businesses and individuals. In addition, no one at TKWW may participate in any illegal or unsanctioned boycott of any country, government, business or individual. The Company has internal procedures to comply with these obligations in our relationships with our partners, suppliers, vendors and customers, and everyone at TKWW is

CODE OF CONDUCT & ETHICS

required to understand and follow such procedures.

In sending or receiving physical goods (including internal Company transfers of IT or other equipment) internationally, we may also be subject to import and export laws. International trade restrictions are complex, with severe legal penalties for violations. You should contact your manager or the Legal Department for further guidance on these requirements.

Competition

We are dedicated to ethical, fair and vigorous competition and believe in selling TKWW's products and services based on their merit, superior quality, functionality and competitive pricing. TKWW is also subject to certain competition laws around the world which prohibit us from taking actions that unreasonably restrain or inhibit competition in the markets in which we operate.

Everyone at TKWW must act in accordance with these laws and this Code, including that they will not:

- Fix, coordinate or control pricing or marketing decisions with our competitors
- Improperly share information (e.g. non-public pricing, profit or competitive information), cooperate or otherwise coordinate our activities with our competitors
- Limit competition against any competitors, or act to divide or allocate territories or customers with our competitors
- Offer or solicit improper payments or gratuities in connection with the purchase of goods or services for TKWW, its affiliates or the sales of their products or service
- Engage or assist in unlawful boycotts of particular customers

The requirements of international competition laws are complex, and carry significant penalties for violations. When engaging with a TKWW competitor, reach out to the Legal Department at legal@theknotww.com.

Fair Dealing

#WeLoveOurUsers and it is essential that we embody their trust in us by maintaining transparent and ethical practices. TKWW is strongly committed to dealing fairly with our customers, vendors, suppliers and competitors. We do not use illegal or unethical practices to gain competitive advantages, or manipulate, deceive, conceal or abuse information and/or facts. We learn about our competition fairly and appropriately, and in compliance with applicable laws and regulations. In addition, everyone at TKWW is responsible for ensuring that our marketing, sales and other practices are truthful and not misleading or deceptive. If you see a possible violation, speak up using the reporting procedures contained in this Code.

CODE OF CONDUCT & ETHICS

Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, officers and directors, including all finance and accounting employees, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records. Individuals should immediately report using the procedures outlined in this Code if they learn that information in any filing, report or public communication was incomplete, inaccurate or misleading at the time it was made or if subsequent information would affect a similar future filing, report or public communication.

Material Non-Public Information

We will not disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material non-public information with respect to TKWW, its affiliates, their securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers, investors or other third parties to ensure that our presentations do not contain material non-public information.

Corporate Recordkeeping

We create, retain and dispose of our Company records as part of our normal course of business in compliance with all TKWW policies and guidelines, as well as all regulatory and legal requirements. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with applicable accounting principles. We must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of TKWW books, records, processes or internal controls.

Insider Trading

Although TKWW is not a publicly traded company, you may come into possession of confidential and/or highly sensitive information that may have insider trading implications in the course of your service with TKWW. This information may concern TKWW's customers or other publicly traded corporations with whom TKWW does business. Employees, officers and directors must not trade in securities (i.e., stock, bonds, options) of any company while in possession of material, non-public information.

CODE OF CONDUCT & ETHICS

“Material, non-public information” is any information which could reasonably be expected to affect the price of a company’s securities. If you are considering buying or selling securities because of non-public information you possess, you should assume that such information is material.

It is also important to keep in mind that if any trade you make becomes the subject of an investigation by the government, the trade will be viewed after-the-fact with the benefit of hindsight. Consequently, you should always carefully consider how your trades would look from this perspective and consult with legal counsel if appropriate.

Federal law and TKWW policy also prohibit you from “tipping” family or friends regarding material, non-public information that you learn in the course of your position with TKWW about any publicly traded company. This is forbidden even when you derive no benefit from the trade. Insider trading penalties are very serious, and could result in significant penalties for you and the Company. Any suspected violations should be immediately reported following the procedures outlined in this Code.

Confidentiality, Privacy and Data Security

Privacy and Data Security

In the course of our business, we are entrusted with the personally identifiable information (PII) of our employees, contractors, users, customers, vendors and partners. This PII can include names, email addresses, billing information, contact information and more. TKWW is strongly committed to handling and protecting PII appropriately, including in compliance with our privacy policies and with applicable privacy and data protection laws and regulations.

Everyone at TKWW is required to maintain the privacy, security and confidentiality of all PII they come into contact with in the course of their work, other than when they are legally required to disclose such PII. This obligation includes:

- Timely completing all data protection and security trainings required by the Company
- Collecting and accessing PII only when necessary for the specific legitimate business purpose
- Storing and disposing of PII securely, and according to Company policies
- Transmitting PII securely, including through the use of appropriate encryption, and only to authorized parties who are made aware of their obligation to protect its confidentiality
- Promptly reporting any potential security incidents or risks to the Legal Department

CODE OF CONDUCT & ETHICS

- Complying at all times with our privacy policies, and applicable privacy and data protection laws and regulations. The policies, laws and regulations that apply may vary by location, and you are responsible for understanding the rules which apply to your role and working location(s). If you have questions about what policies, laws or regulations apply to your handling of PII, please contact the Legal Department

In addition, certain employees may come into contact with employee personal health information (PHI) as part of their roles with the Company. PHI may be subject to additional handling, storage, processing and other requirements, including under the U.S. Health Insurance Portability and Accountability Act of 1996 (HIPAA). Employees who may handle employee PHI as part of their roles are required to comply with these additional obligations and must timely complete all relevant Company-required training, including HIPAA and other location-specific compliance training. Contact the Legal Department if you have any questions or require additional guidance.

Confidential and Proprietary Information

As part of your service with TKWW, you will come into contact with confidential and proprietary information, both regarding the Company and third parties. Confidential information is information that is not publicly known, and which a reasonable person would believe to be private and/or confidential. Proprietary information is highly confidential information about a company, which can include information about intellectual property (e.g., software code, patents, trade secrets, business plans/strategies, trademarks and copyrights).

All officers, directors, employees and contractors of the Company have certain confidentiality obligations described in the employment or service related agreements which they have entered into with the Company. You are required to protect all Company confidential and/or proprietary information and should never disclose or disseminate such information to third parties without explicit authorization from the Legal Department. In addition, you must protect any third party confidential and/or proprietary information you come into contact with in the course of your work. This includes refraining from infringing on any third party's intellectual property rights.

These confidentiality obligations may continue even for some period after you leave TKWW and violations can lead to substantial penalties for you and/or the Company. For more information, please see your Employee Guide. If you have any questions about these obligations, please contact the Legal Department.

CODE OF CONDUCT & ETHICS

Conflicts of Interest and Business Courtesies

Conflicts of Interest

A “**Conflict of Interest**” is any relationship or activity that might impair, or appear to impair, our ability to make objective and fair decisions when performing our jobs.

At times, we may be faced with situations where the business actions we take on behalf of TKWW may conflict with our own personal, outside business or family interests because the course of action that is best for us personally may not also be the best course of action for TKWW. We owe a duty to TKWW to advance its legitimate interests when the opportunity to do so arises. We must never use TKWW property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position at TKWW.

Here are some other ways in which Conflicts of Interest could arise:

- Being employed (you or a close family member, e.g. spouse/partner, sibling, parent or child) by, serving as a director of, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with TKWW
- Hiring or supervising family members or closely related persons
- Serving as a board member for an outside commercial company or organization
- Owning or having a substantial interest in a competitor, supplier or contractor
- Having a personal interest, financial interest or potential gain in any TKWW transaction
- Placing company business with a firm owned or controlled by a TKWW employee or his or her family
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier (see below for more information on this)

Determining whether a Conflict of Interest exists is not always easy to do. Before engaging in any activity, transaction or relationship that might give rise to a Conflict of Interest, employees, officers and directors must promptly contact the TKWW Legal Department at legal@theknotww.com.

Corporate Opportunities and Outside Work

At TKWW, **#WeHustleEveryDay** and work hard to create exciting opportunities and outcomes for the Company. TKWW employees, officers and directors may not use their positions at the Company, or Company information or property, to take, or direct any third party to take, any

CODE OF CONDUCT & ETHICS

business opportunity from the Company without prior authorization from the Legal Department. In addition, subject to applicable law, you cannot use Company information or property to compete against the Company or for personal gain. If you have any questions about work outside the Company, or your use of Company information or equipment other than for your work with TKWW, please contact your manager.

Business Courtesies: Gifts, Gratuities, Meals and Entertainment

“Business Courtesies” may include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom TKWW does or may do business.

Sometimes, we may accept or provide Business Courtesies as part of forming or strengthening business relationships. However, actions that create a perception that TKWW has sought, received or given favorable treatment in exchange for Business Courtesies should be avoided. We will neither give nor accept Business Courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of TKWW or customers, or would cause embarrassment or reflect negatively on TKWW's reputation. If you are planning to give or accept any Business Courtesies, you are required to first get approval from your manager and/or Department Executive.

There are some circumstances where additional approval may be required. For example, everyone at TKWW is prohibited from the following without express prior authorization from the Legal Department:

- Giving or accepting any Business Courtesies from any Government Officials (as defined in this Code), unless specifically authorized by the Legal Department in compliance with the company's anti-bribery and other policies
- Giving or accepting any Business Courtesy which is of more than nominal value (meaning \$100 USD or greater)
- Giving or accepting Business Courtesies repeatedly or abnormally frequently to or from one source
- Giving or accepting any Business Courtesy which could be perceived as a bribe or kickback in order to influence a particular contract negotiation or action
- Giving or accepting any Business Courtesies which could publicly embarrass or otherwise negatively impact the Company if publicly disclosed

If you have any questions or need guidance, please contact your manager or the Legal Department.

CODE OF CONDUCT & ETHICS

Reporting and Anti-Retaliation

Complaint Reporting and Investigation Procedures

AT TKWW, we speak up if we see something wrong. If you become aware of a possible violation of this Code, applicable law or any other Company policy, or you have reason to believe that one occurred, then you have a responsibility to report it immediately. You can report issues in any of the following ways:

- Using the Compliance Hotline via phone or online (more on this below!):
https://irdirect.net/knotww/whistleblower_iframe
- Contacting your manager
- Contacting your HRBP
- Contacting the Legal Department at legal@theknotww.com
 - Contacting any member of the TKWW Compliance Team:
 - General Counsel (Compliance Team Manager)
 - Chief Executive Officer
 - Chief Financial Officer
 - Chief Human Resources Officer
 - Audit Committee Chair

Depending on the circumstances, you may prefer one of these reporting mechanisms over another. You should choose whichever mechanism you feel most comfortable with.

The Compliance Team has primary responsibility for ensuring that incidents of actual or suspected violations or misconduct are properly investigated and remediated. The Compliance Team reports to the Audit Committee of the Board, who has oversight over the Company's compliance and investigation process, and is governed by our internal complaint investigation procedures. Any investigations of reported violations will be designed to determine all relevant facts and circumstances, and to protect the interests of all parties. Confidentiality and anonymity will be maintained to the fullest extent possible, based upon the circumstances and applicable law. For more information on the reporting and investigation processes, please see your Employee Guide.

Compliance Hotline

The Compliance Hotline is an independent resource for reporting potential violations or misconduct.

CODE OF CONDUCT & ETHICS

You can report to the Compliance Hotline by visiting https://irdirect.net/knotww/whistleblower_iframe (which includes phone and online options) and following the instructions.

Some benefits of choosing to report to the Compliance Hotline are:

- You may choose to remain anonymous
- 24/7 reporting lines in several languages
- Complaint follow-up options if desired

We respect all choices to remain anonymous and do our best to maintain anonymity. However, in some circumstances, it may be difficult to investigate complaints while maintaining total anonymity. In all investigations, including where anonymity is not possible, TKWW and the Compliance Team are committed to maintaining confidentiality to the fullest extent possible, in accordance with applicable law. Please see your Employee Guide for more information. If you have any questions, please contact the Legal Department.

Protection Against Retaliation

TKWW prohibits retaliation for good faith use of these complaint procedures, objecting to potential violations, or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the Company or any governmental enforcement agency.

“Good faith” means having a sincere and honest belief that the issues raised are credible or reasonably likely.

Individuals who believe they have been subjected to retaliation, or believe that another individual has been subjected to retaliation, should report this concern pursuant to the procedures in this Code and in your Employee Guide. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this Code and other company policies is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, the Company may take appropriate action to reinforce its commitment to providing a work environment free from retaliation. For more information, please see your Employee Guide or contact the Legal Department.

CODE OF CONDUCT & ETHICS

Questions

If you have any questions about this Code, please contact your manager or the Legal Department at legal@theknotww.com.