

MOLOCO 2024

Supplier Code of Conduct

Doing Business with Moloco

Purpose

Our integrity and professionalism are the cornerstone of our business. Moloco is committed to promoting the highest standards of ethical business conduct and complying with all applicable laws, rules, and regulations and in accordance with our Moloco values. We expect the same from our suppliers. If a supplier fails to meet the requirements of this Code of Conduct, Moloco may make a determination to not award new business or to terminate an existing agreement(s).

This Supplier Code of Conduct (“Code”) is intended to serve as a guide to help suppliers answer potential legal and ethical questions that may arise.

This Code applies to all suppliers and partners.



Core Values



Lead with humility

Everyone's voice is respected, valued, and heard. With humility, we become more open and accessible to each other. We win, lose, and learn together. Accountability and feedback are essential to our success.



Uncapped growth mindset

We see all situations as opportunities to learn, grow, and improve as individuals and as an organization. We seek diverse perspectives, encourage curiosity, and promote experimentation to push the boundaries of what's possible.



Create real value

We pursue the most impactful opportunities with rigor and integrity. We take intelligent risks and make disciplined trade-offs to maintain deep focus. We help our customers win by delivering durable value.



Go further together

We're one team working towards one mission and vision. We collaborate proactively and inclusively, involving the right people at the right time and in the right way. We strive to create a more equitable workplace. We won't let each other fail.

Honest and Ethical Conduct

Conflicts of Interest

A conflict of interest is any activity, relationship, or interest that is or appears to be inconsistent with or opposed to the best interests of Moloco.

Before engaging in any activity, transaction, or relationship that might give rise to a conflict of interest or even an appearance of a conflict of interest, you must first notify our Sourcing team. Examples of conflicts of interest include familial ties to Moloco employees, existing business relationship outside of Moloco, decisions based on personal gain over organizational benefit, etc.

Anti Corruption

Moloco does not tolerate bribery or corruption anywhere we operate. As a company, we are expected to comply with anti-corruption laws, including the United States Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act 2010, India’s Prevention of Corruption Act 1988, the Israeli Penal Code, South Korea’s Improper Solicitation Act, the Criminal Law of the People's Republic of China, and any other anti-corruption laws applicable in any other jurisdictions in which the Company operates (collectively referred to as the “Anti-Corruption Laws”). As our valued partner, we expect the same from you. That means you may not provide or receive anything of value to secure an improper advantage.

Meals, Gifts, and Entertainment

Fostering strong relationships and socializing with vendors and suppliers is an integral part of building important business relationships. However, all such business meals, entertainment, and gifting must be conducted consistent with customary and prudent business practices and our Anti-Corruption Policy.

All travel and expenses must comply with Moloco’s Supplier Travel Requirements Policy.

Honest and Ethical Conduct

No policy can address or anticipate every situation you might face

We expect that you will act in accordance with this Code, our policies, and in a manner that avoids even the appearance of improper behavior. This Supplier Code is subject to periodic review and updates to align with evolving business needs, policies, and legal requirements. Suppliers must adhere to the most current version of the Supplier Code at all times.

No Retaliation

Moloco upholds confidentiality and prohibits retaliation against individuals who, in good faith, report potential violations of this Supplier Code of Conduct.

Reporting Concerns

Suppliers and their employees are expected and encouraged to report unethical, suspicious, or illegal behavior, including possible violation of this Supplier Code of Conduct to Moloco. There are several channels available to you to report violations or raise concerns. Use the channel that is most comfortable for you.

1. You can always report a concern to your Moloco point of contact
2. Moloco Sourcing team at Sourcing@moloco.com
3. Moloco's EthicsPoint [website](#).

Consult the process set forth in our Whistleblower Policy for additional ways to report concerns, including how to report concerns anonymously.

Complying with the Law

All partners of Moloco are expected to comply with applicable laws, including local labor laws.

No Bribery or Corruption

All forms of bribery and corruption are prohibited. We will not tolerate bribery or corruption in any form or for any purpose. There is no potential benefit that can justify damaging our integrity and reputation or the trust others place in us.

All persons subject to this Code must comply fully with the Foreign Corrupt Practices Act (FCPA) and other applicable laws that prohibit bribery and corruption. Many of these laws are very broad and apply to both government and private or commercial bribery and corruption.

Money laundering and Third-party Payments

We are committed to complying fully with all anti-money laundering and antiterrorism laws throughout the world. Money laundering occurs when individuals or organizations attempt to conceal illicit funds or make such funds look legitimate.

Safety and Security

We expect you to treat others fairly and with respect and to be professional at all times. We promote and provide a work environment free of violence and we are committed to the safety and security of our employees and property. We will not tolerate threats of violence, acts of aggression, or intimidation. You are prohibited from possessing firearms, other weapons, explosive devices, or dangerous substances or materials in the workplace.

Protecting Information and Intellectual Property (IP)

We expect our partners to protect Moloco information and IP. We also expect that you will take all necessary steps to protect Moloco's trademarks, copyrights, patents, and other intellectual property from loss, theft, accidental disclosure, or misuse.

Disclosing Confidential Information About Moloco and Others

We sometimes must disclose our confidential information in the course of doing business together. You must comply with the terms of the NDA and limit use of confidential information.

Data Privacy

Trust is the foundation of our relationships. We value the confidence our partners have in us and take the responsibility of protecting their information seriously. To be worthy of their trust, we built, and will continue to grow Moloco with an emphasis on security, compliance, and privacy. We expect our partners to do the same.