



Code of Business Conduct

TITLE	Code of Business Conduct
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COVERED ENTITIES	NerdWallet, Inc., subsidiaries and affiliates
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Table of Contents

I. Overview

II. Scope

III. Definitions

IV. Standards and Practices

V. Roles and Responsibilities

VI. Compliance and Monitoring

I. Overview

This policy establishes a structured approach to Code of Business Conduct (the “Code”) to ensure compliance, efficiency, and alignment with organizational goals and regulatory requirements. NerdWallet is committed to promoting equality of opportunity for all staff employees and job applicants. The Company aims to create a working environment in which all individuals are able to make the best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

NerdWallet, Inc. and its subsidiaries and affiliates controlled by it (collectively, “NerdWallet” or “Company”) are committed to maintaining the highest standards of business conduct and ethics. This Code outlines our expectations and provides guidance on how to act with integrity, comply with laws, and protect our values.

Every employee, officer, director, and contractor must understand and uphold the principles of this Code, apply sound judgment, and maintain high ethical standards. Violations may lead to disciplinary action, up to and including termination, legal action, or referral to authorities.

This Code complements other internal policies, such as:

- Insider Trading Policy
- Anti-Bribery and Anti-Corruption Policy
- Corporate Disclosure Policy
- Employee Handbook
- Confidential Information and Invention Assignment and Arbitration Agreement

II. Scope

This policy applies to all NerdWallet, Inc. employees, officers, directors, contractors, and subsidiaries, collectively referred to as “employees.” It also extends to consultants and third-party service providers acting on behalf of NerdWallet or its affiliates. The policy encompasses all business functions, operations, and regulated activities undertaken by the Company and its affiliates across jurisdictions.

III. Definitions

Bribery/Corruption:

Offering, giving, receiving, or soliciting anything of value to gain an improper or unfair business advantage. NerdWallet prohibits all forms of bribery and corruption.

Confidential Information:

Non-public business, financial, personal, or technical information owned or held by NerdWallet. This includes any data that, if disclosed, could harm NerdWallet or its stakeholders.

Conflict of Interest:

A situation in which personal interests, relationships, or activities could interfere with—or appear to interfere with—NerdWallet’s best interests or the objective performance of professional duties.

Insider Trading:

The buying or selling of securities while in possession of material, non-public information. Engaging in insider trading violates both company policy and securities laws.

Proprietary Information:

Intellectual property, trade secrets, or confidential business data owned by NerdWallet. This includes designs, processes, research, strategies, software code, and any other material developed or used in the course of business.

IV. Standards and Practices

While this Code covers a wide range of business conduct, it is not the only document that addresses the conduct of NerdWallet employees, officers and directors. For instance, this Code references separate more detailed policies relating to Anti-Corruption and Insider Trading. In addition, specific teams or functions within the Company may have additional policies regarding ethical behavior, conflicts of interest and the like. For example, the Company’s content team has additional policies regarding ethics, conflicts of interest and other matters designed to maintain editorial independence and integrity. This Code is not meant to reduce or limit any such additional policies.

Finally, NerdWallet’s Employee Handbook includes policies relating to, among other things, harassment and discrimination and NerdWallet employees remain subject to the terms of the Confidential Information and Invention Assignment and Arbitration Agreement that they signed in connection with their employment. If you have any questions about whether your behavior or any behavior you observe is appropriate, it is your responsibility to ask.

1. Honest and Ethical Conduct

We promote a culture of honesty and integrity. Employees must avoid dishonesty, fraud, and misrepresentation in all business dealings.

2. Legal Compliance

Obeying the law is the foundation of this Code. Our success depends upon each employee operating within legal guidelines and cooperating with local, national and international authorities. We expect employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as NerdWallet, to civil and/or criminal penalties.

3. Fair Lending and Non-Discrimination

NerdWallet is committed to fair, equitable, and non-discriminatory treatment of consumers. We do not discriminate in any aspect of a consumer financial product or service—including marketing, lead generation, eligibility assessments, referrals, or servicing—on the basis of any characteristic protected by applicable law (such as race, color, religion, national origin, sex, marital status, age, receipt of public assistance, disability, or any other status protected under federal, state, or local law). Employees must ensure decisions and interactions are based on legitimate, objective criteria and must promptly escalate any concern regarding potential discriminatory treatment, disparate impact, or unfair or deceptive practices to Legal/Compliance.

4. Insider Trading

Employees, officers and directors who have access to confidential (or “inside”) information are not permitted to use or share that information for stock trading purposes. All non-public information about NerdWallet or about other companies is considered confidential information. To use material non-public information in connection with buying or selling securities, including “tipping” others who might make an investment decision on the basis of this information, is illegal. Please refer to NerdWallet’s Insider Trading Policy for more detailed information.

5. International Business Laws

Our employees, officers and directors are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. Please also refer to NerdWallet’s Anti-Bribery and Anti-Corruption Policy.

6. Antitrust

Antitrust laws are designed to protect the competitive process and impose severe penalties for certain types of violations, including criminal penalties. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Certain kinds of information, such as pricing, production and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be.

7. Conflicts of Interest

A “conflict of interest” exists when an employee’s personal interest interferes with the interests of NerdWallet. We expect our employees, officers and directors to be free from influences that conflict with the best interests of NerdWallet or might deprive NerdWallet of their undivided loyalty in business dealings. Even just the appearance of a conflict of interest can be damaging and should be avoided. Whether or not a conflict of interest exists can be unclear. The following are some (but not all) situations that may involve problematic conflicts of interests: (a) employment by, consulting for, or service on the board of a competitor,

customer or supplier; (b) owning a significant financial interest in an entity that does business, seeks to do business or competes with us; (c) soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us; (d) certain types of "moonlighting"; and (e) loans to, or guarantees of obligations of, employees, officers or directors or their family members by NerdWallet. If you have any concerns about how to comply with this policy, you should discuss it with the Chief Legal Officer. NerdWallet has the right and obligation to determine whether conflicts of interest exist and to take appropriate action to address them. NerdWallet may periodically require some or all employees to disclose their outside activities to assess whether any conflicts of interest may be likely to exist.

8. Corporate Opportunities

You may not take personal advantage of opportunities for NerdWallet that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way. If you have any concerns about how to comply with this policy, you should discuss it with the Chief Legal Officer.

9. Financial Integrity

The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others. We also rely upon our accounting and other business and corporate records in preparing publicly-filed reports. Securities laws require that these reports provide full, fair, accurate, timely and understandable disclosure and fairly present our financial condition and results of operations. Employees who contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is complete, accurate and transparent.

10. Fair Dealing

Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Statements regarding NerdWallet's services must not be untrue, misleading, deceptive or fraudulent. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from employees of other companies is prohibited. You are expected to deal fairly with our customers, suppliers, employees and anyone else with whom you have contact in the course of performing your job. Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

11. Gifts and Entertainment

Gifts and entertainment relating to government officials is addressed in NerdWallet's Anti-Bribery and Anti-Corruption Policy. Business gifts and entertainment with counterparts in the private sector are acceptable if they are intended to create goodwill and sound working relationships, and not to gain improper advantage with customers. Gifts and entertainment may only be offered or accepted by employees or their family members if the gift or entertainment: (1) is not a cash or cash equivalent gift, (2) is consistent with customary and acceptable business practices, (3) is reasonable and not excessive in value (i.e., less than \$100 in value), (4) cannot be construed as a bribe or kickback and (5) does not violate any laws or regulations.

If you have any concerns about whether any gifts or entertainment offered or received by you are appropriate under this Code, you are expected to request permission from your manager or from the Chief Legal Officer.

12. Use of Company Assets

All employees, officers and directors are expected to protect our assets and ensure their efficient use. All employees should seek to ensure that Company property under their control is used properly and is protected by adequate controls and safeguards. Theft, carelessness and waste have a direct impact on our profitability. Our property, such as office supplies, computer equipment, buildings and products, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use our corporate name, any brand name or trademark owned or associated with NerdWallet or any letterhead stationery for any personal purpose.

Employees are also expected to protect the Company's intangible assets, including proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering ideas, designs, databases, records, salary information and any unpublished financial data. Unauthorized use or distribution of this information violates Company policy and may be illegal. In this regard, NerdWallet employees are bound by the terms of the Confidential Information and Invention Assignment and Arbitration Agreement or similar terms that they agree to in connection with their employment.

13. Confidentiality

As an employee, officer or director of NerdWallet, you may learn information about NerdWallet or other companies that is confidential and proprietary. You must take care to keep this information confidential. Materials that contain confidential information should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet is prohibited. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas within NerdWallet, such as cafeterias. All NerdWallet emails, voicemails and other communications are presumed confidential and should not be forwarded outside of NerdWallet, except where required for legitimate business purposes. In this regard, NerdWallet employees are bound by the terms of the Confidential Information and Invention Assignment and Arbitration Agreement or similar terms that they agree to in connection with their employment.

14. Protecting User Trust and Data

Our business depends on user trust. We handle information related to financial products, consumer inquiries, and partner relationships with care and integrity. We must ensure transparency in how information is collected and used, avoid using data in ways that are misleading or inconsistent with our disclosures or user expectations, and protect confidential partner and user information from unauthorized access or disclosure. Employees are expected to promptly escalate concerns regarding unauthorized access to data, potential misuse of data, inappropriate tracking, or security weaknesses. No employee may conceal a data incident or delay reporting out of concern for reputational impact.

15. Artificial Intelligence

Employees may use artificial intelligence (AI) tools purchased by NerdWallet pursuant to enterprise contracts only for legitimate business purposes and in accordance with applicable Company policies. AI use is governed by the AI Governance Framework (the “Framework”) which is overseen by NerdWallet’s Data Governance Board, and all AI tools must be reviewed pursuant to the Framework and approved prior to use. Employees are prohibited from entering confidential, proprietary, customer, or other sensitive information into public or unapproved AI tools without prior written approval. Employees remain fully responsible and accountable for all work products, including content generated with AI assistance, and must ensure compliance with applicable laws, intellectual property rights, confidentiality obligations, and Company policies, including NerdWallet’s privacy notice.

16. Media/Public Discussion

It is our policy to disclose material information concerning NerdWallet to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the company will have equal access to information. All inquiries or calls from the press and financial analysts should be referred to Public Relations or Investor Relations, respectively. Please also refer to NerdWallet’s Corporate Disclosure Policy.

17. Waivers

Any waiver of this Code for executive officers or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of any stock exchange on which our capital stock is listed and our Corporate Governance Guidelines, a committee of the Board of Directors and will be disclosed to stockholders as required by applicable laws, rules and regulations. Waivers for other employees may be made in writing by the Chief Legal Officer.

18. Questions and Reporting Potential Violations

This Code does not address every issue that a NerdWallet executive officer, director or employee may face. We cannot anticipate every possible situation or every ethical or conduct-related question that may arise. However, the principles in this Code should guide you when facing an unfamiliar situation. Above all else, remember that you are expected to use good judgment and be proactive in asking questions, seeking guidance and reporting potential violations of this Code.

Your most immediate resource for any matter related to this Code is your supervisor, who may have the information you need or may be able to refer the question to another

appropriate source. There may, however, be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concern with your HRBP or the Chief Legal Officer.

If you are aware of a suspected or actual violation of this Code, you have a responsibility to promptly report it and we will take prompt disciplinary action against any employee, officer or director who retaliates against you. The Chief Legal Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances.

A hotline, which you may reach at 1 (844) 836-6742 (toll-free) or by visiting <https://herdwallet.allvoices.co/>¹ and clicking "Send Feedback," is also available to those who wish to report violations of this Code, including concerns regarding NerdWallet auditing and accounting matters. You may call the toll-free number anonymously if you prefer, as it is not equipped with caller identification, although in that case the Chief Legal Officer will be unable to obtain follow-up details from you that may be necessary to investigate the matter. Whether you identify yourself or remain anonymous, your contact with the anonymous reporting service will be kept strictly confidential to the extent reasonably possible within the objectives of this Code.

If any investigation indicates that a violation of this Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee, officer or director is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination and, in appropriate cases, civil action or referral for criminal prosecution.

Please note that retaliation against employees reporting violations of this Code is prohibited and we will take prompt disciplinary action against any employee, officer or director who attempts to retaliate against you for reporting violations.

V. Roles and Responsibilities

All Employees

- Read, understand, and annually attest to NerdWallet's Code of Business Conduct.
- Act with integrity, honesty, and transparency in all interactions with colleagues, customers, and business partners.
- Safeguard NerdWallet's confidential and proprietary information, including customer data, intellectual property, and other sensitive materials.
- Promptly report any suspected violations of this Code, company policies, or applicable laws through the appropriate channels (including the anonymous hotline or the Chief Legal Officer).

People Team

- Promote ethical conduct by reinforcing NerdWallet's core values of transparency, impact, curiosity, and ownership.

- Ensure team members are aware of and attest to the Code of Business Conduct on an annual basis.
- Create an environment of openness and trust where employees feel comfortable asking questions and reporting concerns without fear of retaliation.
- Escalate potential violations or concerns promptly to the Chief Legal Officer or through the anonymous reporting hotline.

Executives and Senior Leadership

- Set the “tone at the top” by modeling ethical leadership and promoting a culture rooted in integrity and compliance.
- Ensure resources, training, and support are available to sustain strong ethical and compliance practices throughout the organization.
- Partner with the Chief Legal Officer and People Team to ensure consistent and fair handling of Code violations.
- Foster transparent communication regarding the importance of ethical behavior in achieving NerdWallet’s mission and business goals.

Chief Legal Officer and Compliance Team

- Oversee the implementation, communication, and enforcement of the Code.
- Investigate reports of potential violations promptly and confidentially, ensuring fair and consistent outcomes.
- Report significant ethics or compliance issues to the Executive Team and, when appropriate, the Board of Directors.

Board of Directors

- Maintain ultimate oversight of NerdWallet’s ethics and compliance program.
- Promote an organizational culture that values integrity, transparency, and ethical business practices.
- Ensure accountability and appropriate follow-up on matters involving senior executives or directors.

Shared Accountability

At NerdWallet, maintaining the highest standards of integrity is everyone’s responsibility. Each of us—regardless of role, level, or function—plays a vital part in protecting our company’s reputation, our customers’ trust, and one another. Ethical behavior is not just about following the rules; it’s about living our values every day and making decisions that reflect transparency, fairness, and respect. By working together and holding ourselves and each other accountable, we ensure that NerdWallet remains a place where integrity drives every action and decision.

VI. Compliance and Monitoring.

NerdWallet conducts policy reviews at least annually. Results regarding noncompliance are reported to leadership for oversight and action. Continuous improvements are informed by audit findings, employee feedback, and industry developments to strengthen training, reporting, and the company's culture of integrity.