A message from our CEO

Dear Kongers:

Over the last 10 years together we've built a company and technologies which power billions of transactions each day. Customers and members of the Kong community around the world depend on us to help power the connections of everyday life.

And we're just getting started.

Enduring companies, like relationships, are built on trust, mutual respect, and daily practices that reflect our commitments to ourselves, each other, and the community. In this Kong Kode we have collected the principles and policies to help us all understand our obligations and reinforce the ways to put Kong's values into practice with our day-to-day activities.

Augusto Marietti

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Staying Informed

Why we have a Kong Kode

By delivering on the promise of our **Kong Kode**, we protect and enhance the reputation of Kong, and play a key role in building a better working world for our Kongers, and for others. By committing to the highest standards, it will help us in hiring amazing Kongers, building amazing products, and attracting amazing users and community.

The Kong Kode describes regulations, laws, and Kong policies that are most likely to affect the work of Kongers. In some cases, the company’s ask may go beyond what the law requires or permits. The Kong Kode informs you with important legal and ethical concerns that may arise in your work. If you are ever uncertain about an issue or the best action to take in a certain situation, please speak with your manager, executive leadership, the People team, and/or the Legal team. The problems can usually be minimized by asking for feedback sooner rather than later, when they may become harder to address.

Kong has implemented policies concerning legal and ethical behavior in various areas. The purpose of the Kong Kode is not to supersede those policies, but to provide a summary of Kong’s policies and expectations in certain areas. Kongers should read the Kong Kode and stay informed with Kong’s other policies. This and the Company’s policies are available on Confluence and Namely. The Kong Kode may be revised from time to time, and the most recent, controlling version will always be available on Confluence. Additionally, Kongers are responsible for reviewing and understanding the Kong Kode and all Company policies.

How we work

It is expected that we each have a personal responsibility to uphold and encourage other Kongers to uphold the Kong Kode into **How We Work** as it provides the ethical and behavioral framework on which we should base our decisions every day.

The Kong Kode is anchored in our values and beliefs based on **GRUCEO** that underpins all that we do.

We expect all Kongers to know and follow the Kong Kode on how we work. Failure to do so can result in disciplinary action, including termination of employment.

In this Code, we use “Konger” to refer to a Kong employee. However, we expect contractors, consultants and temporary employees to also follow the Kode or it can lead to termination of their relationship with Kong.
Working with Others

Confidentiality

Kongers must protect confidential information they receive in the course of performing their roles and responsibilities. This information could be information about Kong, its customers, partners, individuals or other information that is not public or is personal data. Kongers must during the term their employment and thereafter keep all confidential information in strictest confidence, and not disclose it to others or use it except for the benefit of the company.

You should also never attempt to acquire proprietary information of others through improper means. This includes inducing past or present employees of other companies to divulge proprietary information.

If Kongers are ever uncertain on what is confidential, they should speak with their manager or the Legal team.

Fair Dealing

Kong’s integrity is vital to us and within our GRUCEO values. The way we interact with our customers, business partners and competitors molds our reputation, builds long-term trust and ultimately determines our success. Kongers should deal fairly with our customers, business partners, competitors, and employees. We must never take unfair advantage of others through manipulation, concealment, abuse of information, misrepresentation of material facts, or any other unfair dealing practice.

We are also subject to fair competition laws. Kongers should never enter into any understanding or agreement with an actual or potential competitor, supplier or channel partner that would illegally limit or restrict in any way either party’s or a third party’s ability to compete.

Anti-bribery

Kongers must not engage in bribery. This means you or anyone acting on the company’s behalf should not offer, promise, or give, money, business courtesies, or anything else of value, directly or indirectly, to others intending to receive, or for having received, favorable treatment. Follow anti-bribery and anti-corruption laws wherever you do business and, regardless of what local laws may permit, never offer, pay, promise to pay or accept anything of value either directly or indirectly to improperly influence the judgment or actions of others.
**Reporting security incidents**

Any Konger who discovers or is notified of a known or suspected breach of data security must immediately report the data security incident to the Kong security team at security@konghq.com and no other person (unless subsequently authorized by the Legal Department).

Some examples of potential data security incidents are:

- Theft or loss of a computer, mobile device or other data storage device owned by Kong or a Konger who used the device to store data relating to Kong.
- A break-in or robbery at a Kong facility.
- A third party compromising or suspected of compromising Kong’s databases, accounts, computers, networks, communications, or other information resources.
- Breach by a third party of a non-disclosure agreement or confidentiality agreement with Kong.
- Employees or contractors of Kong viewing, accessing or disclosing information, files or databases outside the scope of their assigned responsibilities.

**Demonstrating Accountability**

**Non-discrimination and equal opportunities**

Kong treats each employee fairly and with respect and provides equal employment opportunities without regard to any distinctions based on race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, or otherwise in accordance with the law. You must avoid any actions in your job that would undermine Kong’s policy against discrimination.

Kong expressly prohibits any form of unlawful employee harassment based on race, color, religion, gender, sexual orientation, national origin, age, genetic information, disability or veteran status. Improper interference with the ability of Kong employees to perform their expected job duties is absolutely not tolerated.

**Harassment & no retaliation**

Kong is committed to a work environment in which all individuals are treated with respect and dignity. Kong expects that all professional relationships will be business-like and free of bias, prejudice and harassment.

Kong encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Kong to promptly and thoroughly investigate such reports. Kong prohibits retaliation against any individual who reports discrimination or harassment or who participates in an
investigation of such reports. If you feel you are being retaliated against, please do report to the applicable parties below.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances, requests for sexual favors, and other verbal, visual or physical acts of a sexual nature.

Harassment on the basis of any other protected characteristic is also strictly prohibited.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

**Complying with applicable laws**

Kongers must comply with all laws, rules and regulations applicable to the Company wherever it does business. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

**Observing ethical business standards**

Kongers should maintain the highest standards of personal ethics and integrity in our dealings on behalf of Kong and our community. At the minimum, this means complying with the principles and guidelines listed in our Kong Kode and upholding our GRUCEO values.
Protecting What is Ours

Conflicts of interest

You should avoid all conflicts between your personal interests and the business interests of Kong. A conflict of interest is a situation where you are - or could even appear to be - subject to influences, interests or relationships that could interfere with your judgment, decisions, acts or duties on behalf of Kong.

It’s not possible to anticipate every conflict situation but below are some common conflict situations.

1. Gifts, Entertainment or Other Things of Value

Accepting gifts, entertainment, and other business courtesies from a Kong competitor, prospect, customer or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant. Before accepting any gift or courtesy, consult with your manager or Legal team for approval.

2. Personal Relationships

Kong wants to ensure that corporate practices do not create situations such as favoritism. This extends to practices that involve employee hiring, promotion and transfer. Close relatives, partners, those in a dating relationship or members of the same household are not permitted to be in positions that have a reporting responsibility to each other.

If employees begin a dating relationship or become relatives, partners or members of the same household and if one individual is in a supervisory position over the other, that person is required to inform the Company of the relationship.

Kong reserves the right to apply this policy to situations where there is a conflict or the potential for conflict because of the relationship between employees, even if there is no direct-reporting relationship or authority involved.

A conflict of interest may also arise from the personal relationship of a Konger with an employee of a customer, vendor, community member or other business contact. If you have or become involved in any such a relationship, subject to applicable law, you should notify your manager and People team, who will assess the situation and advise you whether any steps must be taken to mitigate the conflict.
3. Interests in Other Companies

You may not own shares in, or have any business or other monetary interest in, any third party you know to be a supplier, customer or competitor of Kong unless you obtain approval first from your manager and then have your request reviewed by the Legal team. However, you may own shares of a Kong supplier, customer or competitor if its shares are publicly traded and you hold less than 0.5% of the shares of the company.

Maintaining accurate records

Kong's business records must always be prepared accurately and reliably, reflect the true nature of the transaction, and be stored properly. All transactions must be executed in accordance with the company's general or specific authorization. Kong's financial records and accounts must reflect all transactions and all other events of the Company. No Konger should ever falsify or forge any business records.

Safeguarding Kong property

You may not use or permit others to use Kong property or services for personal purposes or benefit unless properly authorized. You may not accept, remove or receive any property from Kong that has not been duly authorized and approved. You may incur expenses only for legitimate Kong business purposes.

As noted in Section 1 above, you must also always safeguard Kong's confidential information and those of its customers, suppliers and partners.

Electronic communication and internet use

The following guidelines have been established for using the Internet, company-provided cell phones and e-mail in an appropriate, ethical and professional manner. Internet, company-provided equipment (e.g., cell phone, laptops, computers) and services may not be used for transmitting, retrieving or storing any communications of a defamatory, discriminatory, harassing or pornographic nature.

The following actions are forbidden: using disparaging, abusive, profane or offensive language; creating, viewing or displaying materials that might adversely or negatively reflect upon Kong or be contrary to Kong's best interests; and engaging in any illegal activities, including piracy, cracking, extortion, blackmail, copyright infringement, and unauthorized access of any computers and company-provided equipment such as cell phones and laptops.
Where to find help and report concerns

- Anyone in Management
- Kong’s People team (peopleoperations@konghq.com)
- Kong’s Legal team (legal@konghq.com) or email directly to any member of the Legal team
- mail to our HQ Address: 77 Geary Street, Fifth Floor, San Francisco, CA 94108
- Kong Integrity Hotline
  https://www.lighthouse-services.com/konghq

Our goal is to maintain an environment in which all Kongers feel comfortable raising issues that they believe are important and maintaining a culture where open feedback is encouraged and supported. We feel this leads to a more productive, connected and fulfilling workplace. We support transparent feedback and encourage you to attempt to resolve concerns or issues that involve the workplace by having respectful and open discussions with your immediate manager or leadership members. These discussions may help resolve many workplace issues.

Kongers can expect that management will be available to discuss workplace problems or concerns in an environment free of distractions and that management will not subject employees to any reprisals when they raise concerns in good faith.

Kong recognizes the importance of maintaining the confidentiality of issues and concerns communicated by Kongers. However, in some instances, it may not be possible to keep your identity confidential without impairing the integrity of an investigation or because of certain legal requirements. Managers will communicate the details of issues and concerns communicated by employees only on a need-to-know basis, or as required by law and/or Kong policies.