

**ContextLogic  
Holdings Inc.  
Code of Conduct  
and Ethics**

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# Our Code

As we continue on our mission, remember that the way we work matters. Our commitment to integrity must shine through every day – in every interaction and every business decision we make. That is what ContextLogic Holdings, Inc. expects from each of us. When we show this commitment in our daily work, we enhance our reputation.

Our Code of Conduct and Ethics (“the Code”) is an important resource in this effort. It is designed with you in mind – a vital resource that will help you:

- Comply with applicable laws, regulations, and company policies.
- Promote integrity and the highest standards of ethical conduct.
- Address common ethical situations you could encounter in your work.
- Avoid even the appearance of anything improper in connection with our business activities.

## Who Must Follow This Code

All employees of ContextLogic Holdings Inc., including corporate officers and members of our Board of Directors, are required to read, understand, and meet the standards and obligations in this Code.

All consultants, agents, suppliers, contractors, and other third parties, serve as an extension of ContextLogic Holdings Inc.. They are expected to follow the spirit of our Code, as well as any applicable contractual provisions when working on our behalf.

## Complying With Laws and Regulations

ContextLogic Holdings Inc. is committed to compliance with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face, so in addition to the Code, ContextLogic Holdings Inc. also has other resources that can be of help. These

additional resources are listed throughout the Code. As always, we rely on you to use good judgment and to seek help when you need it.

All employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, you should seek guidance from our Compliance team.

## Employee Responsibilities

Each of us must take responsibility for acting with integrity, even when this means making difficult choices. Meeting our responsibilities is what enables us to succeed and grow.

- Always act in a professional, honest, and ethical manner when acting on ContextLogic HoldingsInc.'s behalf.
- Know the information in the Code and written company policies and pay particular attention to the topics that apply to your specific job responsibilities.
- Complete all required employee training in a timely manner and keep up-to-date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies, or the law to your supervisor, Human Resources, Legal, the Compliance team, an executive, or any of the resources listed in this Code.
- Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating our Code, our policies, or the law.

### **CONSIDER THIS**

I'm a supervisor, and I'm not clear on what my obligations are if someone comes to me with an accusation—and what if it involves an executive?

No matter who is involved in the allegation, you must report it. ContextLogic Holdings Inc. provides several avenues for reporting concerns. If, for any reason, you are uncomfortable reporting to a particular person, you may talk to any of the other resources listed in the Code or another member of management.

## Additional Responsibilities of Supervisor

ContextLogic Holdings Inc. leaders are expected to meet the following additional responsibilities:

- Lead by example. As a supervisor, you are expected to exemplify high standards of ethical business conduct.
- Help create a work environment that values mutual respect and open communication.
- Be a resource for others. Be available to communicate with employees, contractors, suppliers, and other business partners about how the Code and other policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- Respond quickly and effectively. When a concern is brought to your attention, ensure that it is treated seriously and with due respect for everyone involved.
- Be aware of your authority limits and do not take any action that exceeds it. If you are ever unsure of what is appropriate (and what is not), discuss the matter with your supervisor.
- Only delegate responsibly. Never delegate authority to any individual whom you believe may engage in unlawful conduct or unethical activities.

### **CONSIDER THIS**

I observed misconduct in an area not under my supervision. Am I still required to report the issue?

You are chiefly responsible for employees and other third parties under your supervision, but all ContextLogic Holdings Inc. employees are required to report misconduct. The best approach would be to talk first with the employee/supervisor who oversees the area where the problem is occurring, but if this isn't feasible or effective, you should use the other resources described in our Code.

## Making the Right Choice – Our Guidelines for Ethical Decision-Making

Choosing the right thing to do is not always easy. There may be times when you will feel under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you are not alone. There are resources available to help you.

Facing a Difficult Decision? It may help to ask yourself:

- Is it legal?
- Is it consistent with our Code and our values?
- Would I feel comfortable if senior management and others within ContextLogic Holdings Inc. knew about it?
- Would I feel comfortable if my decision or my actions were made public?

### **CONSIDER THIS**

A senior member of the Company asked me to do something that I think is illegal. I think this senior member knows it's illegal because he told me to keep it confidential and not tell any other employees. What should I do?

If you feel comfortable, you should explain your concerns to your supervisor or another senior member of the Company. You could also seek guidance from the Chief Compliance Officer. ContextLogic Holdings Inc. never wants to do anything illegal, either unintentionally or intentionally.

If the answer to all of these questions is “yes,” the decision to move forward is probably OK, but if the answer to any question is “no” or “I’m not sure,” stop and seek guidance.

### **One More Thing**

We value your feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to better address a particular issue you have encountered, bring them forward. Promoting an ethical ContextLogic Holdings Inc. is a responsibility we all share.

## **Asking Questions and Reporting Concerns – The Company Ethics Hotline**

If you see or suspect any violation of our Code, our policies, or the law, or if you have a question about what to do, talk to your supervisor.

If you are uncomfortable speaking with your supervisor, there are other resources available to help you:

- Contact another member of management.
- Contact our Chief Compliance Officer.
- Email [compliance@contextlogic.com](mailto:compliance@contextlogic.com)
- Call/Visit the EthicsPoint Hotline:
  - [EthicsPoint – Portal Submission](#)
  - Toll Free 1-844-362-0786

Remember, an issue cannot be addressed unless it is brought to someone’s attention.

**What to expect when you use the Ethics Hotline** - Anyone, employee or third party, may submit a concern to the Ethics Hotline. The Ethics Hotline web portal and phone line are available 24 hours, 7 days a week. Trained specialists from an independent third-party provider of corporate compliance services will

answer your call document your concerns, and forward a written report to ContextLogic Holdings Inc. for further investigation.

Note, however, for any matter reported anonymously, there may be occasions and circumstances in which we may need to inquire about your identity in order to fully investigate. To this extent, we may not be able to guarantee indefinite anonymity.

When you contact the Ethics Hotline, you may choose to report the concern anonymously where allowed by local law. All reports will be treated equally whether they are submitted anonymously or not.

### **CONSIDER THIS**

Our supervisor typically does nothing when concerns about potential misconduct are brought to her attention, and I believe she has made things difficult for co-workers who have raised issues. I have a problem – a co-worker is doing something that I believe to be ethically wrong. What should I do?

Please take action and speak up. You are required to report misconduct. While starting with your supervisor is often the best way to address concerns efficiently, if you do not believe it is appropriate or do not feel comfortable doing so, you should talk to another member of management or contact the Chief Compliance Officer.

## **Our Non-Retaliation Policy**

We will not tolerate any retaliation against any employee who, in good faith, asks questions, makes a report of actions that may be inconsistent with our Code, our policies, or the law, or who assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

## CONSIDER THIS

I suspect there may be some unethical behavior going on in my department involving my supervisor. I know I should report my suspicions, and I'm thinking about reporting the behavior, but I'm concerned about retaliation.

You are required to report misconduct to your supervisor or Chief Compliance Officer. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated, and if they are true, retaliators will be disciplined.

## Accountability

Violating our Code, policies, or the law or encouraging others to do so exposes ContextLogic Holdings Inc. to liability and puts our reputation at risk. If an ethics or compliance problem does occur, we expect you to report it so that an effective solution can be developed. Violations of the Code may result in discipline, up to and including termination of employment. You should also understand that violations of laws or regulations may result in legal proceedings and penalties, including, in some circumstances, criminal prosecution.

## Waivers and Changes to the Code

On rare occasions, limited waivers of the Code may be necessary. Any waiver of this Code for directors or executive officers may be made only by the Board of Directors or a committee of the Board and will be promptly disclosed to stockholders as required by applicable laws, rules, and regulations.

# Promoting a Safe and Respectful Workplace

## Diversity, Equal Opportunity, and Non-Discrimination

ContextLogic Holdings Inc. hires employees with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

We support laws prohibiting discrimination based on protected characteristics such as a person's race, color, gender, national origin, age, religion, disability, veteran status, marital status, or sexual orientation. We also judge colleagues, job applicants, and business partners on the basis of their qualifications, demonstrated skills, and achievements.

### DO THE RIGHT THING

- Treat others respectfully and professionally.
- Promote diversity in recruiting, hiring, and other employment decisions.
- Do not discriminate against others on the basis of any other characteristic protected by law or company policy.
- If you supervise others, judge them on performance. Avoid introducing unrelated considerations into your decisions.

### WATCH OUT FOR

- Comments, jokes, or materials, including emails, which others might consider offensive.
- Inappropriate bias when judging others – when evaluating others, use objective, quantifiable standards.

## CONSIDER THIS

One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

You should notify your immediate manager, Chief Compliance Officer, or Human Resources. Sending these kinds of jokes violates our values as well as our policies that relate to the use of email and our standards on diversity, harassment, and discrimination. By doing nothing, you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

Find Out More by reading the equal employment opportunity and non-discrimination policy in your local handbook.

## Harassment-Free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, and abuse.

Verbal or physical conduct by any employee that harasses another, disrupts another's work performance or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

At ContextLogic Holdings Inc., we do not tolerate:

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- Causing physical injury to another.
- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Threatening, intimidating, or coercing others on or off the premises – at any time, for any purpose.

- Weapons in the workplace – this includes not only our facilities but also parking lots and alternate work locations maintained by our company.

## Sexual Harassment

A common form of harassment is sexual harassment, which generally occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions, such as a request for a date, a sexual favor, or other similar conduct of a sexual nature.
- An intimidating, offensive, or hostile work environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

### DO THE RIGHT THING

- Help each other by speaking out when a co-worker's conduct makes others uncomfortable.
- Never tolerate sexual harassment, including requests for sexual favors or other unwelcome verbal or physical conduct of a sexual nature.
- Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

### WATCH OUT FOR

- Unwelcome remarks, gestures, or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering.

- Verbal abuse, threats, or taunting.

### **CONSIDER THIS**

While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office, and it was after regular working hours, so I wasn't sure what I should do. Is it harassment?

Yes, it is. This type of conduct is not tolerated, not only during working hours but in all work-related situations, including business trips. Tell your colleague such actions are inappropriate and must be stopped, and then report the problem.

Find Out More by reading the preventing harassment policy in your local handbook.

## **Health and Safety**

While we are a remote workplace, ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others.

Even in a remote workplace, we can only achieve our goal of a safe and healthy workplace through every employee's active participation and support. Situations that may pose a health, safety, or environmental hazard should be reported immediately. All reports can be made without fear of reprisal.

Safety is a condition of employment, and we expect the commitment of each employee to make ContextLogic Holdings Inc. an accident-free workplace.

### **DO THE RIGHT THING**

- Observe the safety, security, and health rules and practices that apply to your job.

- Notify your supervisor immediately about any unsafe equipment or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Maintain a neat, safe working environment by keeping workstations, and other workspaces free from obstacles, wires, and other potential hazards.

## **WATCH OUT FOR**

- Unsafe practices or work conditions.
- Carelessness in enforcing security standards, such as procedures and password protocols.

## **Alcohol and Drugs**

ContextLogic Holdings Inc. is committed to maintaining a safe, comfortable, and productive work environment for all of its employees. Alcohol consumption is generally not permitted during regular working hours, and ContextLogic Holdings Inc. employees may not report to work or perform work while under the influence of alcohol or illegal drugs. Also, please do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm ContextLogic Holdings Inc.'s reputation.

ContextLogic Holdings Inc. is also committed to responsible alcohol consumption at company events or work-related functions. When drinking alcoholic beverages at these events, use good judgment, drink in moderation, and follow all laws.

## **Workplace Violence**

Violence of any kind has no place at ContextLogic Holdings Inc. We will not tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- Possession of a firearm, explosive, or other dangerous weapon while on any work related travel or work related meeting.
- Inflicting or threatening injury or damage to another person's life, health, well-being, family, or property.

# Working With Business Partners, Suppliers and Vendors

## Honest and Fair Dealing

We treat our business partners, suppliers and vendors fairly. We work to understand and meet their needs while always remaining true to our own ethical standards. We tell the truth about our services and capabilities and never make promises we cannot keep.

Treat others fairly and honestly. Do not take unfair advantage through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior, or any other unfair practice.

### **DO THE RIGHT THING**

- Be responsive to all reasonable requests from our business partners, suppliers and vendors but never comply with a request to do something that you regard as unlawful or contrary to our high standards.
- Promise only what you can deliver, and deliver on what you promise.

### **WATCH OUT FOR**

- Pressure from others to avoid rules and regulations.
- Temptations to tell people what you think they want to hear rather than the truth.

## Supplier & Vendor Relations

ContextLogic Holdings Inc. evaluates and engages with qualified suppliers and vendors on an objective basis grounded in fairness. When selecting suppliers and vendors, we assess each one's ability to satisfy our business and technical

needs and requirements. We also make purchasing decisions based on the long-term cost and benefit to ContextLogic Holdings Inc.

## Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of ContextLogic Holdings Inc. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your supervisor so that we can properly evaluate, monitor, and manage them.

In addition, ContextLogic Holdings Inc.'s Board of Directors may adopt separate policies regarding directors' conflicts of interest to address any particular circumstances arising from their role as board members.

### **DO THE RIGHT THING**

- Always make business decisions in the best interest of ContextLogic Holdings Inc.
- Avoid conflict of interest situations whenever possible.
- Discuss with your supervisor full details of any situation that could be perceived as a potential conflict of interest.
- Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with ContextLogic Holdings Inc.

Be alert to situations, including the following, which are common examples of potential conflicts of interest.

## Corporate Opportunities

If you learn about a business opportunity because of your job, it belongs to ContextLogic Holdings Inc. first. This means that you should not take that opportunity for yourself unless you get approval from our Compliance team.

## Friends and Relatives

On occasion, you may find yourself working with a close friend or relative who works for a business partner, supplier or vendor. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your supervisor to determine if any precautions need to be taken.

## Outside Employment

To make sure there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment with your supervisor. If approved, you must ensure that the outside activity does not interfere with your work at ContextLogic Holdings Inc. Working for a business partner, supplier or vendor may raise conflicts that will need to be resolved. Also, any approved side or personal business should not compete with ContextLogic Holdings Inc.

## Personal Investments

A conflict can occur if you have a significant ownership or other financial interest in a business partners, supplier or vendor. Make sure you know what is permitted—and what is not—by our policies and seek help with any questions. Also, if you have a personal or financial relationship with any ContextLogic Holdings Inc. service provider and you have work-related responsibilities relating to that provider, you must disclose that relationship and recuse yourself from any decision-making regarding that service provider.

## Civic Activities

Unless ContextLogic Holdings Inc. management specifically asks you to do so and/or you specifically clear it with the Chief Compliance Officer, you should not accept a seat on the board of directors or advisory board of any of our suppliers, vendors and/or business partners, especially if your current job gives you the ability to influence our relationship with them.

Find Out More by reading our conflicts of interest policy.

## Gifts and Entertainment

A modest gift may be a thoughtful “thank you,” or a meal may be an appropriate setting for a business discussion. If not handled carefully, however, the exchange of gifts and entertainment may appear to create a conflict of interest or other misconduct. This is especially true if it happens frequently or if the value is large enough that someone may think it can improperly influence a business decision. Proper records of such expenses must also be created and maintained.

We do not accept or provide gifts, favors, or entertainment – even if it complies with our policies – if the intent is to improperly influence any decision.

### **DO THE RIGHT THING**

- Make sure to follow ContextLogic Holdings Inc.’s travel and expense policy.
- Exchange gifts and entertainment that foster goodwill in business relationships, but never provide or accept gifts or entertainment that obligate or appear to obligate the recipient.
- Before offering or providing gifts, favors, or entertainment, understand and comply with the policies of the recipient’s organization.
- Never accept cash or cash equivalents.
- Do not request or solicit personal gifts, favors, entertainment, or services.

- Raise a concern if you suspect that a colleague, third party, or other ContextLogic Holdings Inc. representative may be engaged in any attempt to improperly influence a government official's decision.

## **WATCH OUT FOR**

- Situations that could embarrass you or ContextLogic Holdings Inc. or locations that could be inappropriate for business settings, such as a dance club or spa.
- Gifts, favors, or entertainment that may be reasonable for a privately owned entity and/or individual but not for a government official or agency.

## **CONSIDER THIS**

I received a gift from a business partner that I believe was excessive. What should I do?

You need to let your supervisor or the Compliance team know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

Is it permissible to give gifts with our company's logo on them?

Generally, yes. As long as the gift is not being offered to a government official, promotional gifts like ContextLogic Holdings Inc. swag are acceptable because they are nominal in value and help create brand awareness.

One of our suppliers invited me to lunch. May I go?

Yes, provided there is a clear business purpose, it occurs infrequently, and the cost is reasonable.

# Protecting Information on and Assets

## Financial Integrity

The accuracy and completeness of our disclosures and business records is essential to making informed decisions and to supporting investors, regulators, and others. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices, internal controls, our policies, and the law. Further, all documents filed with the Securities and Exchange Commission (SEC), including financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Some employees have special responsibilities in this area. If you are involved in any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure reports or disclosures about our financial records are full, fair, accurate, complete, objective, and timely, and never falsify or mischaracterize any book, record, account, entry, or transaction that relates to ContextLogic Holdings Inc. You must also cooperate fully with ContextLogic Holdings Inc.'s accounting and internal audit departments, as well as ContextLogic Holdings Inc.'s independent public accountants and counsel.

## Records Management

Documents should only be disposed of in compliance with ContextLogic Holdings Inc. policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact our Compliance team.

Remember, everyone at ContextLogic Holdings Inc. contributes to the process of recording business results and maintaining records. Whether you are filing an expense report, preparing a financial statement, or simply completing a timesheet, be honest, accurate, and complete.

### **DO THE RIGHT THING**

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all of your business communications. Write as though the records you create may one day become public documents.

### **WATCH OUT FOR**

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets, or liabilities.
- Improper destruction of documents.

### **CONSIDER THIS**

At the end of the last quarter, my supervisor asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

No, you didn't. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. Therefore, it was a misrepresentation and, depending on the circumstances, could amount to fraud.

## Physical and Electronic Assets

Each of us is entrusted with ContextLogic Holdings Inc.'s physical and electronic assets, and we are personally responsible for using them with care and protecting them from fraud, waste, and abuse. Personal use of these assets is discouraged but, where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment.

Physical assets include ours, office equipment, peripherals and supplies.

Electronic assets include our hardware, software, email, and voicemail systems, intranet and internet access, computer data, and any information created, sent, received, downloaded, or stored on our systems.

### **DO THE RIGHT THING**

Use ContextLogic Holdings Inc. assets to carry out your job responsibilities, never for improper or illegal activities. Observe good physical security practices, especially those related to badging in and out of our facilities.

Also, observe good cybersecurity practices and be a good steward of our electronic resources and systems:

- Do not use ContextLogic Holdings Inc. equipment or information systems to create, store, or send content that others might find offensive.
- Do not share passwords or allow other people, including friends and family, to use ContextLogic Holdings Inc. resources.
- Only use properly licensed software. Copying or using unlicensed or “pirated” software on company computers or other equipment to conduct company business is strictly prohibited. If you have any questions about whether or not a particular use of the software is licensed, contact the IT Department.

## WATCH OUT FOR

- Requests to borrow or use ContextLogic Holdings Inc. equipment without approval.
- Unknown individuals without proper credentials entering our facilities.
- Excessive use of ContextLogic Holdings Inc. resources for personal purposes.

## Confidential Information

Each of us must be vigilant and protect ContextLogic Holdings Inc.'s confidential information, including intellectual property and personal information. This means keeping it secure, limiting access to those who need to know to do their jobs, and only using it for authorized purposes. It also means keeping this information confidential even after your employment with ContextLogic Holdings Inc. ends.

Our business partners, colleagues and others place their trust in us – we must protect their confidential information, too.

## Intellectual Property

ContextLogic Holdings Inc. commits substantial resources to technology development and innovation. The creation and protection of our intellectual property (IP) rights are critical to our business. Examples of our IP include:

- Trade secrets and discoveries
- Methods, know-how, and techniques
- Trademarks, and copyrights

Promptly disclose to company management any inventions or other IP that you create while you are employed by ContextLogic Holdings Inc., and contact our Legal team if you receive any statements or questions from third parties regarding (1) the scope of ContextLogic Holdings Inc. intellectual property rights; (2) the applicability of ContextLogic Holdings Inc. rights to another

company's products, or; (3) the applicability of a third party's intellectual property rights to ContextLogic Holdings Inc. intellectual property rights or products.

## Data Privacy

We also protect and respect the personal information of others. Follow our policies and all applicable laws if your job requires collecting, accessing, using, storing, sharing, or disposing of sensitive information. Only use it – and share it with others outside of ContextLogic Holdings Inc. – for legitimate business purposes. Make sure you know the kind of information that is considered personal information. It includes anything that could be used to identify someone, either directly or indirectly, such as:

- A name
- Email address
- Phone number

## DO THE RIGHT THING

Properly label confidential information to indicate how it should be handled, distributed, and destroyed.

Only store or communicate company information using ContextLogic Holdings Inc. information systems.

Understand the expectations business partners regarding the protection, use, and disclosure of the confidential information that they provide to us.

Immediately report any loss, breach, or theft of confidential information to your manager.

## WATCH OUT FOR

- Discussions of ContextLogic Holdings Inc. confidential information in places where others might be able to overhear – for example, on planes and elevators, when using mobile phones, or through unsecure networks.
- Sending confidential information to unattended fax machines or printers.
- Failing to shred or securely dispose of sensitive information.
- Using “free” or individually purchased internet hosting, collaboration, or cloud services.

## CONSIDER THIS

If I invent something while employed at ContextLogic Holdings Inc. that has nothing to do with our business, does the company own the rights to it?

No. However, products, improvements, and ideas for products or improvements developed during your ContextLogic Holdings Inc. employment that relate in any way to products our company has designed, manufactured, or marketed or to products considered for manufacture or marketing by ContextLogic Holdings Inc. are the property of ContextLogic Holdings Inc.

## Speaking on behalf of ContextLogic Holdings Inc.

We are committed to maintaining honest, professional, and lawful internal and public communications. Our company needs a consistent voice when making disclosures or providing information to the public. For this reason, it is important that only authorized individuals speak on behalf of ContextLogic Holdings Inc. Communications with media, investors, stock analysts, and other members of the financial community should be referred to our Chief Financial Officer or Communications team.

## Full, Fair, and Timely Disclosures

ContextLogic Holdings Inc. is committed to meeting its legal obligations of full and fair disclosure in all reports and documents that describe our business and financial results, and other public communications.

### WATCH OUT FOR

- Giving public speeches, writing articles for professional journals, or other public communications that relate to ContextLogic Holdings Inc. without appropriate management approval.
- The temptation to use your title or affiliation outside of your work for ContextLogic Holdings Inc. without it being clear that the use is for identification only.
- Invitations to speak “off the record” to journalists or analysts who ask you for information about ContextLogic Holdings Inc.

## Social Media

We rely on you to understand both the benefits and the risks of social media and to communicate responsibly and legally, no matter what medium you choose. Remember, you are responsible for the content of your posts, so make sure to follow our policies and use good judgment.

Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of ContextLogic Holdings Inc.. Make sure to protect our confidential information and brand on social media.

If you believe a false statement about our company has been posted, do not post or share nonpublic information, even if your intent is to “set the record

straight.” Your posting might be misinterpreted, start false rumors, or may be inaccurate or misleading. Instead, contact our Communications team.

# Following the Letter and the Spirit of the Law

## Cooperating With Investigations and Audits

Each of us has an obligation to fully cooperate with internal and external investigations and audits conducted by ContextLogic Holdings Inc. You are expected to fully cooperate and ensure that any information you provide is true, accurate, and complete.

In addition, in the course of business, you may receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, immediately notify your supervisor and our Chief Compliance Officer before taking or promising any action. If you are responsible for responding to a government inquiry or request, you have the same duty to fully cooperate and provide true, accurate, and complete information.

### **WATCH OUT FOR**

- Falsified information. Never destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- Unlawful influence. Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a company or government investigator.

## Insider Trading

In the course of business, you may learn confidential information about ContextLogic Holdings Inc. or about other publicly traded companies that is not available to the public at large. Trading securities while aware of such material nonpublic information or disclosing such information to others who then trade (“tipping”) is prohibited by various laws.

## Material Information

This kind of nonpublic information is something a reasonable investor would take into consideration when deciding whether to buy or sell a company's securities. Some examples of information that may be material are:

- A proposed acquisition or sale of a business
- A significant financing round or change in valuation
- Extraordinary management or business developments
- Changes in strategic direction, such as entering new markets

If you have any questions as to whether information is material or has been released to the public, consult with our Chief Compliance Officer or CFO.

### DO THE RIGHT THING

- Do not buy or sell securities of any company when you have material nonpublic information about that company.
- Protect material nonpublic information from the general public, including information in both electronic form and in paper copy.
- Do not communicate such material nonpublic information to other people.

### WATCH OUT FOR

- Requests from friends or family for information about ContextLogic Holdings Inc. or about companies that we do business with. Even casual conversations could be viewed as illegal "tipping" of inside information.
- Tipping – be very careful with inside information and make sure you do not share it with anyone, either on purpose or by accident.

## Anti-Corruption and Bribery

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business, regardless of local customs.

ContextLogic Holdings Inc. is committed to complying with all applicable anti-corruption laws.

We do not pay bribes, kickbacks, or facilitation payments, at any time, for any reason. This applies equally to any person or firm that represents ContextLogic Holdings Inc. The only possible exception is if a potentially improper payment is necessary to protect an individual's health or safety. In such a situation, you should immediately report the payment to our Chief Compliance Officer.

## Key Definitions – Bribery, Corruption, and Facilitation Payments

Bribery means giving or receiving something of value (or offering to do so) to obtain a business, financial, or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage the official to perform his responsibilities.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We may screen third parties, including suppliers, consultants, and vendors who work on ContextLogic Holdings Inc.'s behalf. Third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

## DO THE RIGHT THING

- Never give anything of value inconsistent with local laws and regulations to any government official. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- Understand the standards set forth under anti-bribery laws which apply to your role at ContextLogic Holdings Inc.
- Accurately and completely record all payments to third parties.

## Antitrust and Fair Competition

We believe in free and open competition and never engage in improper practices that may limit competition. That means we never try to gain competitive advantages through unethical or illegal business practices.

## Anti-Money Laundering

We abide by all laws designed to deter criminal enterprise, keep us safe from terrorism, and protect the national security of the countries where we do business. That is why we must never knowingly facilitate either money laundering or terrorist financing.

Money laundering is a global problem with far-reaching and serious consequences. It is the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Terrorist financing refers to funding for terrorist activities, which can come from either legitimate or criminal sources.

Involvement in such activities undermines our integrity, damages our reputation, and can expose ContextLogic Holdings Inc. and the individuals involved to severe sanctions. Report any suspicious financial transactions and activities to our Chief Compliance Officer, CFO, and, if required, to appropriate government agencies.

## The Environment

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment and any potential harm to the health and safety of employees, and the public.

### **DO THE RIGHT THING**

Do your part to make sure that protecting employee safety and the environment is a priority. Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.

- Read and understand all the information provided by our company that is relevant to your job and the health, safety, and environmental effects of our operations.
- Fully cooperate with environmental, health, and safety training and with ContextLogic Holdings Inc.'s periodic compliance reviews of our products and operations.
- Be proactive and look for ways that we can minimize waste, energy, and use of natural resources.

## Lobbying and Campaign Finance

Follow all laws as they relate to the ability of corporations to make political contributions or engage in lobbying or other political campaign activities.

# Make Your Commitment

At ContextLogic Holdings Inc., we believe in following all applicable laws and regulations. All ContextLogic Holdings Inc. employees must complete and submit this Acknowledgement Form and participate in all required ethics and compliance training.

Submitting this form indicates that you have read and understood our Code of Conduct and Ethics and:

- Have reported any possible conflicts of interest.
- If you have concerns related to employee or business conduct, you will contact management or use any of the reporting methods included in this Code.

Name

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Signature

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Date

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# Resources

## ContextLogic Inc. Ethics Hotline

- [EthicsPoint – Portal Submission](#)
- Toll Free 1-844-362-0786

## Human Resources

hr@contextlogic.com

## Compliance

compliance@contextlogic.com