



Match Group, Inc.
Code of Business Conduct and Ethics
(June 2021)

Introduction

This Code of Business Conduct and Ethics (“Code of Ethics” or “Code”) reflects the commitment of Match Group, Inc. (“Match Group” and, together with its businesses, the “Company”) to conduct its business affairs in accordance with not only the requirements of applicable law, but also standards of ethical conduct that will maintain and foster the Company’s reputation for honest and straightforward business dealings. The standards in this Code may be further explained or implemented through policy memoranda, including those relating to specific areas of our business. If a law conflicts with a policy or this Code, you must comply with the law.

This Code and related memoranda and manuals are available from the Match Group People and Legal Departments. This Code applies to all Match Group directors, officers and employees, as well as to directors, officers and employees of each subsidiary of Match Group. Such directors, officers and employees are collectively hereinafter referred to as “Covered Persons”.

You are strongly encouraged to consult with supervisory personnel or the Match Group Legal Department if you have any questions concerning the requirements or interpretation of this Code.

Those who violate the standards in this Code may be subject to disciplinary action. If you are involved in, or aware of, a situation which you believe may violate or lead to a violation of this Code, please follow the guidelines described in Sections 9 and 10 of this Code.

1. Honest, Lawful, and Ethical Conduct

The conduct of Covered Persons in performing their duties on behalf of the Company must in all situations, as to all matters and at all times, be honest, lawful and in accordance with high ethical and professional standards.

The requirement of honest, lawful, and ethical conduct is broad and therefore must be stated in general terms. As such, this Code does not cover every issue that may arise, but instead sets out basic principles to guide all Covered Persons.

2. Conflicts of Interest

Conflicts of interest may impair or interfere with a Covered Person’s performance of their duties to the Company or their ability to act in the Company’s best interests. A “conflict of interest” exists when a Covered Person’s personal or private interest improperly interferes with, or is adverse (or appears to be adverse) to, the interests of the Company. A conflict situation can arise when a Covered Person takes actions or has interests that may make it difficult to perform their work for the Company objectively and effectively. Conflicts of interest often arise directly, but may also arise indirectly, such as when a Covered Person or

a Covered Person's family member receives improper personal benefits as a result of the Covered Person's position in the Company.

While it is impossible to foresee every potential conflict that could arise, examples of conflicts could include affiliations or investments in competitors, customers, suppliers, or others who do business with the Company. All Covered Persons must be sensitive to potential conflicts and avoid them where possible. The Company respects the privacy of its directors, officers and employees and their right to engage in outside activities (which expressly include, in the case of non-employee directors, serving as an executive officer, employee or director of, and/or maintaining a significant direct or indirect beneficial ownership interest in, another entity) that do not conflict with the interests of, do not interfere with the performance of their duties on behalf of, and do not reflect poorly on the Company. The Company nonetheless has the right and obligation to determine whether a conflict of interest (or improper appearance of a conflict of interest) exists and to take appropriate action to address it.

Before (i) engaging in any material transaction (including the making of a significant direct or indirect investment in another entity) or accepting an executive officer or director position with a non-profit entity, in each case that reasonably could give rise to an actual or apparent conflict of interest, or (ii) accepting an executive officer or director position with another for-profit entity, each Covered Person must provide full and fair disclosure of all relevant facts and circumstances to Match Group's Chief Business Affairs and Legal Officer. After evaluating the reported transaction or relationship, Match Group's Chief Business Affairs and Legal Officer will determine whether it reasonably could give rise to an actual or apparent conflict of interest; and if so, (i) determine whether any protective measures are appropriate, or (ii) in the case of Match Group directors or Company officers reporting directly to Match Group's Chief Executive Officer, make a recommendation to Match Group's Nominating Committee or Chief Executive Officer, respectively, who will make such determination, as appropriate. Any protective measures may include prohibiting such transaction or relationship.

In most cases, anything that would constitute a conflict for a Covered Person also would present a conflict if it is related to a member of their family. In particular, if a Covered Person's spouse or other close family member works for a firm that does business with or competes against the Company, Match Group's Legal Department should be advised of the situation in writing. Failure to so advise may lead to disciplinary action.

Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with the Match Group Legal Department. In addition, for Match Group directors only, the provisions of Section 2 are subject to Article XIII of Match Group's Restated Certificate of Incorporation.

3. Corporate Opportunity

Covered Persons are prohibited from taking advantage, for themselves or other companies with which they are affiliated, of any opportunity that is in any of the Company's lines of business or in which the Company has an interest or expectancy. If any Covered Person has

a question as to whether a given opportunity is covered by the foregoing sentence, they are advised to consult with Match Group's Chief Business Affairs and Legal Officer in advance of pursuing it. Notwithstanding any of the foregoing, in no event shall any director of Match Group be deemed to have violated the terms of this provision if a specific opportunity came to their attention through any means not connected with their service to Match Group.

In addition, Covered Persons may not use corporate property or information or their positions with Match Group for improper personal gain. Lastly, for Match Group directors only, the provisions of Section 3 are subject to Article XIII of Match Group's Restated Certificate of Incorporation.

4. Compliance with Laws, Rules, and Regulations

Complying with the law is the foundation on which Match Group's ethical standards are built. It is Match Group's policy to be a good "corporate citizen". All Covered Persons must comply with applicable governmental laws, rules and regulations. Reasons such as "everyone does it" are unacceptable excuses for violating this requirement of this Code.

Although not all Covered Persons are expected to know the details of these laws, it is important to know enough to determine when to seek advice from your supervisors, managers, the Match Group Legal Department or other appropriate personnel. Any suspected or actual violation of any applicable law, rule or regulation should be reported immediately to your immediate supervisor or the Match Group Legal Department.

5. Insider Trading

Covered Persons who, as a result of their employment at or other association with the Company, are in possession of material, non-public information about any publicly traded corporation, including Match Group, may not engage in transactions in the securities of such corporations and should not share such information with anyone who might engage in such transactions. To do so is not only unethical, but also illegal, and could expose you to civil and criminal penalties.

Please read and familiarize yourself with the "Match Group Securities Trading Policy", which can be obtained from the Match Group People or Legal Departments. If you should have further questions in this area, please consult the Match Group Legal Department.

6. Disclosure, Financial Reporting, and Accounting

The Company is committed to providing full, fair, accurate, timely and understandable disclosure in all reports and documents filed with or submitted to the Securities and Exchange Commission ("SEC") and in all other public communications made by the Company. All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation and brought to the attention of Match Group's Chief Accounting Officer.

Any Covered Person who learns of any material information affecting or potentially affecting the accuracy or adequacy of the disclosures made by the Company in its SEC filings or other public statements must bring the matter promptly to the attention of a member of the Match Group Disclosure Committee. The Disclosure Committee consists of the Chief Business Affairs and Legal Officer of Match Group, the Chief Accounting Officer of Match Group and such other employees of Match Group as may be designated from time to time.

Senior management, including the senior financial officers, of the Company's businesses must report their respective financial results to senior management of Match Group in a way that enables Match Group to fairly present the consolidated financial position and the consolidated results of operations and cash flows of the Company in conformity with accounting principles generally accepted in the United States, applied on a consistent basis.

Any Covered Person who learns of any information concerning: (i) significant deficiencies or material weaknesses in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data accurately, or (ii) any fraud, whether or not material, involving management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls, shall bring the matter promptly to the attention of a member of the Disclosure Committee.

Upon receipt of any such information, the Disclosure Committee shall investigate the matter, consult with senior management as warranted, confer with the Audit Committee of Match Group's Board of Directors if appropriate, and ensure that any necessary corrective action is taken.

7. Confidentiality

Covered Persons must maintain the confidentiality of confidential information entrusted to them by the Company and its respective customers or suppliers, except when disclosure is authorized by the Match Group Legal Department, required by laws or regulations, or ordinary and necessary in the course of carrying out your responsibilities as an employee, officer or director of the Company. Confidential information includes all non-public information that is maintained as confidential by Match Group and might be of use to competitors, or harmful to the Company or its customers or suppliers, if disclosed. It also includes information that suppliers and customers maintain as confidential and have entrusted to us. The obligation of Covered Persons to preserve confidential information includes maintaining as confidential and not disclosing trade secrets of the Company or its suppliers or customers that are entrusted to the Company as defined under the United States Defend Trade Secrets Act of 2016, and other applicable national or state trade secrets laws. Nothing in this Code prohibits an employee from disclosing trade secrets under seal in a court proceeding or as part of a government investigation as allowed by the United States Defend Trade Secrets Act of 2016. The obligation to preserve confidential information and trade secrets continues even after employment or service ends.

8. Waivers of the Code of Business Conduct and Ethics

Any waiver of this Code for executive officers or directors of Match Group may be made only by the Match Group Board of Directors or a properly authorized Match Group Board committee and will be promptly disclosed to Match Group stockholders along with reasons for such waiver as required by law or Nasdaq regulation.

9. Compliance Procedures

We must all work to ensure prompt and consistent action in response to violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.

Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.

Ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

10. Enforcement

The Company is committed to full, prompt, and fair enforcement of the provisions of this Code.

Reporting Violations. Any Covered Person who learns of information indicating that a violation of this Code has been or is about to be committed must immediately report the facts to the Chief Business Affairs and Legal Officer of Match Group.

The failure to report a violation of this Code may itself be a violation of this Code.

Protection for Reporting Violations. It is prohibited, and is a violation of this Code, for anyone associated with the Company to retaliate in any way against anyone who has reported to the Company in good faith information indicating that a violation of this Code may have occurred or may be about to occur.

Prohibited forms of retaliation include adverse employment actions (such as termination, suspension and demotion), the creation of a hostile work environment, and any other type of reprisal for the good-faith reporting of a possible violation of this Code.

Investigating Reports of Violations. Upon receipt of a report of a possible violation of this Code, the Match Group Legal Department shall promptly initiate an investigation to gather the relevant facts.

All lawful and appropriate investigative means and methods may be utilized in the conduct of the investigation.

All Covered Persons shall cooperate in the investigation when called upon to do so. A failure to cooperate may itself constitute a violation of this Code.

In conducting and monitoring investigations, the Match Group Legal Department shall consult and coordinate as appropriate with senior management, the Internal Audit Department, the People Department and the Audit Committee of the Match Group Board of Directors, and shall seek to ensure that the provisions of this Code are applied and enforced consistently across the population of Covered Persons and across the Company's businesses.

Sanctions for Violations. Appropriate disciplinary action shall be determined upon completion of the investigation, if Match Group's Chief Business Affairs and Legal Officer concludes that a violation of this Code been committed and disciplinary action is warranted. Any violation of this Code may result in serious sanctions by the Company, which may include dismissal, suspension without pay, loss of pay or bonus, loss of benefits, demotion or other sanctions.

Any disciplinary action to be taken against a Covered Person shall be subject to the approval of senior management (or, in the case of Match Group directors, the Audit Committee of the Match Group Board of Directors), and shall be carried out by the People Department of the applicable business or Match Group, or the Match Group Board of Directors, as applicable.