



# Sensor Tower code of **business conduct and ethics**

By consistently delivering accurate competitive insights on the mobile economy, Sensor Tower (“we”, “us”, “our”) is the leading data analytics solution used by mobile marketers, app developers and industry analysts. Our status as a trusted and respected data provider was earned through our commitment to adhering to the highest standards of ethical business practices, compliant data practices, and cultivating our employee and customer experiences to ensure continued success.

Sensor Tower operates globally and its personnel work with a diverse range of people and businesses across industries to bring superior data quality. Sensor Tower expects that all its employees, contractors, service providers, vendors, or other persons or entities, whether first or third parties (“ST Personnel”) involved in its business dealings adhere to the principles of this Code of Business Conduct and Ethics (the “Code”).

**This Code covers five critical areas of  
Sensor Tower’s conduct and ethics values:**

**Protect and respect private and proprietary information**

**Compliance with laws and regulations**

**Integrity in business dealings and personal conduct**

**Employee empowerment and human rights**

**Fair business practices**

We understand that all issues regarding ethical business conduct cannot be addressed in a single document and expect that employees and related parties will take the spirit of this Code and apply it broadly. When an issue not specifically addressed in this Code arises, we expect ST Personnel to comply with the highest standards of ethics and integrity.

## 1. Protect and respect private and proprietary information

Sensor Tower's cutting edge market insights are made possible only through our continued dedication to information security and privacy. We take great care in protecting the private, confidential, proprietary and other non-public information we come in contact with doing business. At Sensor Tower, we safeguard our panel participants', clients', employees', and business partners' confidential and personal information we may have access to as part of our business relationships.

Sensor Tower also protects our own confidential and proprietary information. We will not share such information with anyone not authorized to receive such information for business purposes. This duty of confidentiality continues even after ending employment or business relationships with Sensor Tower.

We understand the importance and value of intellectual property rights both for Sensor Tower and for others. Accordingly, we protect the trademarks, patents, and trade secrets belonging to Sensor Tower and will not knowingly violate the valid intellectual property rights of others.

## 2. Compliance with laws and regulations

Sensor Tower believes in operating with the highest ethical standards, and in compliance with all applicable local and national laws and regulations where we do business. We expect persons subject to this Code to interpret legal rules as the minimum standard and encourage pursuit of the highest-grade ethics.

### Anti-Corruption and Anti-Bribery Laws

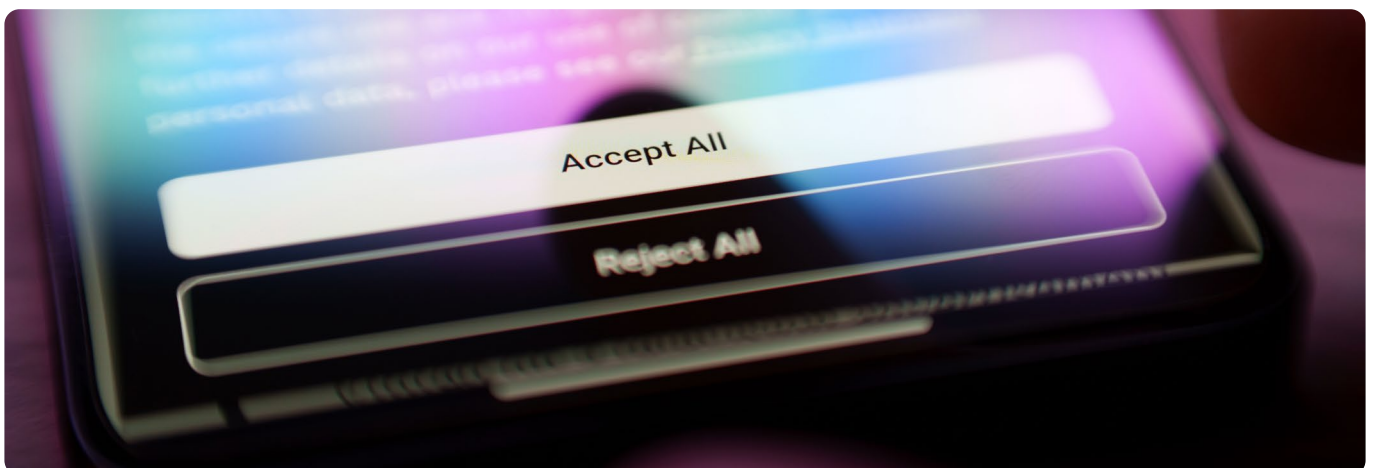
Sensor Tower does not use, support, or promote corrupt business practices. We do not make, promise, offer, or authorize any bribe, kickback, or other benefit to obtain improper business advantages. We expect our employees, partners, and affiliates to abide by all anti-corruption and anti-bribery laws. Sensor Tower understands that these laws are complex, and require persons subject to this Code to avoid any activity that could be construed or perceived as corrupt.

### Data Privacy Protection Laws

Sensor Tower acknowledges that it is our obligation to protect personal data it may encounter while doing business. Any such information processed by Sensor Tower, our business partners, or vendors will be handled in compliance with applicable privacy and data protection laws.

### Anti-Money Laundering and Terrorist Financing

Sensor Tower is committed to complying with all applicable Anti-Money Laundering ("AML") and Counter Terrorist Financing ("CTF") laws and regulations where we do business. Sensor Tower, its employees, agents, and affiliates will not engage with persons or entities participating in unlawful business activities, human rights violations, or subject to international economic sanctions.



## 4. Integrity in business dealings and personal conduct

Sensor Tower's success in the marketplace and reputation as an ethical company depends on continued commitment to integrity in our business dealings and personal conduct. We expect our employees, business partners, and affiliates to act in accordance with the highest standard of personal integrity in matters related to Sensor Tower and its business and relationships.

### Insider Trading

Sensor Tower, its employees, or business partners, may become aware of material, non-public information, also known as "insider information." Such information may be related to Sensor Tower, our customers, or other entities. Buying or selling securities of a company while in possession of insider information is a criminal offense in many countries, and strictly prohibited by Sensor Tower. Sensor Tower will protect non-public information it encounters and will not disseminate or disclose such information to unauthorized parties. Employees are provided with training annually.

### Conflicts of Interest

In order to deliver the best services to our customers and support Sensor Tower's success, work decisions must always be based on what's best for Sensor Tower rather than individual motivations or gain. We believe in doing business free from personal conflicts of interest and expect our employees to avoid using their employment or position with Sensor Tower for any advantage to themselves or close friends or relatives. Some examples that might indicate a potential conflict of interest include, but are not limited to:

- Having financial interest in one of our suppliers, vendors, customers, or competitors
- Hiring a firm owned by a close relative to do consulting work for Sensor Tower
- Service on the board of directors of a competitor

In essence, personal conflicts of interest prioritize an individual's personal gain over the mission and interests of Sensor Tower.

Sensor Tower expects employees to report potential or actual conflicts of interest to management for guidance and resolution.



### Media Relations and Public Statements

Sensor Tower is often cited in the media and news outlets for our trusted mobile economy insights. To preserve our reputation as a trusted source of market data and ensure we communicate with the media in a consistent, timely and professional manner, any employee contacted by the media seeking information or comment from Sensor Tower must notify our Marketing department for proper handling. Sensor Tower employees will not speak to the media on behalf of Sensor Tower without appropriate authorization.

It is imperative that we preserve Sensor Tower's trade secrets, intellectual assets, and confidential information. Even seemingly harmless disclosures through social media could prove damaging to Sensor Tower or our customers. Accordingly, use of social media, blogs, podcasts, and discussion forums when performing work on behalf of Sensor Tower is only permitted when appropriately authorized by Sensor Tower.



### 3. Employee empowerment and human rights

Sensor Tower's success and future growth depend on the contributions of outstanding people within and outside our organization. We believe that safe, supported, and happy people make the best employees and citizens. Sensor Tower is committed to providing a safe and inclusive business environment for our employees, customers, and business partners.

#### Discrimination and Harassment

At Sensor Tower, we embrace the unique qualities of all our employees and customers, and treat each other with respect at all times. As a global business, we understand that laws, cultures, and societal norms differ around the world. However, treating others with dignity and respect, regardless of race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, or any other legally protected personal characteristic, is not optional. Accordingly, Sensor Tower does not tolerate any form of discrimination or harassment, whether it be verbal, physical, or sexual in nature, towards our employees, contractors, customers, business partners, agents, or candidates for employment.

#### Upholding Human Rights

Sensor Tower cares about fair treatment of individuals, protecting human rights, and opposing modern slavery in all forms. We will provide reasonable working hours, fair wages, and safe working conditions for all our employees. Sensor Tower employs a zero-tolerance policy for the use of child or forced labor or human trafficking practices. We will not knowingly do business with persons or entities that engage in these human rights violations, or do not match our standards of human rights.

#### Anti-Retaliation

Sensor Tower protects persons reporting violations of this Code in order to appropriately address inappropriate behavior and uphold our commitments to ethical business practices. Accordingly, we prohibit retaliation of any kind against persons raising concerns in good faith. Any such retaliation incidents among employees will be investigated and Sensor Tower will issue appropriate discipline, up to and including termination.

### 5. Fair business practices

We believe fair and equitable business practices support the growth and development of all marketplace participants. At Sensor Tower, we engage in fair competition and support operation of the free market.

#### Fair Competition

Fair business competition drives innovation to deliver better products, services, and experiences. Sensor Tower is committed to engaging in fair competition—meaning we will not use unfair business advantages that stifle marketplace competition. Sensor Tower will act in strict compliance with all applicable antitrust, competition, and fair trade laws in locations it operates. Sensor Tower will not use unethical or unfair methods of acquiring or exploiting non-public information, engaging in price fixing, or other activities intended to inhibit fair competition in markets.

#### Fair Procurement

Sensor Tower uses service providers and business partners to perform its operations and deliver consistent, valuable insights to its customers. We believe our service providers and partners should hold themselves to the same high standards of ethics and conduct that we value. Accordingly, Sensor Tower expects such parties to adhere to Sensor Tower's ethical values, and comply with applicable laws and regulations, respect human rights, and employ fair labor practices. Reporting Code Violations

Sensor Tower encourages a "Speak Up" culture. Choosing to speak up about workplace concerns helps Sensor Tower build a healthy, ethical, and compliant environment for our employees, customers, and affiliates. Employees may submit good faith concerns about conduct violating this Code or the laws and regulations under which Sensor Tower does business by contacting:

- Their supervisor or manager
- Sensor Tower leadership members
- People Operations
- Legal or Compliance
- Use of the Whistleblower Security Email Address: [sensortower@integritycounts.ca](mailto:sensortower@integritycounts.ca)