



SIMILARWEB LTD.

CODE OF BUSINESS CONDUCT AND ETHICS

Similarweb Ltd. (the “*Company*”) is committed to maintaining the highest standards of business conduct and ethics. This Code of Business Conduct and Ethics (this “*Code*”) reflects the business practices and principles of behavior that support this commitment. We expect every employee, officer and director not only to read and understand the business practices and principles described below, but also to apply good judgment and the highest personal ethical standards in making business decisions. Please remember you should consider not only your own conduct, but also that of your family members, significant others and other people in your household. References in the Code to “employees” are intended to cover officers and, as applicable, directors.

Do not hesitate to ask questions about whether certain conduct may violate the code, to voice concerns or to clarify gray areas. You should also be alert to possible violations and report them without fear of retaliation. See [Section 29](#) below for instructions on how to ask questions or report violations.

Any employee who violates the standards in this Code may be subject to disciplinary action, that, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to termination of employment and, in appropriate cases, civil legal action or referral for criminal prosecution.

While this Code covers a wide range of business conduct, it is not the only document that addresses the conduct of our employees, officers and directors. The Company has handbooks, documentations and policies relating to, among other things, harassment and discrimination. If you have any questions about whether your behavior or any behavior you observe is appropriate, it is your responsibility to ask.

After carefully reviewing this Code, you must sign the acknowledgment attached as [Exhibit A](#) hereto, indicating that you have received, read, understand and agree to comply with this Code. The acknowledgment must be returned either electronically in a manner provided for by the Company or to the person designated as the Company’s Compliance Officer (the “*Compliance Officer*”) (as further described in [Section 29](#)) or such Compliance Officer’s designee within ten (10) business days of your receipt of this Code and on an annual basis as the Company may require.

1. HONEST AND ETHICAL CONDUCT

It is our policy to promote high standards of integrity by conducting our affairs in an honest and ethical manner. All employees are expected to observe high standards of business and personal ethics in the discharge of their assigned duties and responsibilities. This requires honesty, integrity and fair dealing in every aspect of interaction with other Company employees, customers, suppliers, the public, the business community, shareholders, and governmental and regulatory authorities. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice. The Company expects all employees to choose the course of action reflecting the highest integrity. The Company’s reputation

depends on the honesty, fairness and integrity brought to the job by each person associated with us. Unyielding personal integrity and sound judgment is the foundation of corporate integrity. The Company recognizes that local customs and traditions differ from place to place, but honesty is not negotiable or subject to compromise in any culture. A reputation for honesty is a fundamental and foundational Company asset.

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. While we do not expect you to memorize every detail of these laws, rules and regulations, we want you to be able to determine when to seek advice from others. If you do have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your supervisor or the Compliance Officer.

Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as the Company, to civil and/or criminal penalties.

3. PUBLIC REPORTING

It is the Company's policy to observe and comply with all laws, as well as rules and regulations of governmental agencies and authorities, including Israeli and US corporate and securities laws and regulations and rules of the New York Stock Exchange, as applicable to the Company or the conduct of its business wherever located. As a publicly traded company, the Company periodically submits reports to regulators about the Company's activities. It is the Company's policy to promote full, fair, accurate, timely, and understandable disclosure in its periodic reports and other documents filed by the Company and in its public communications.

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 or to communicate such information to others who might trade on the basis of that information. All non-public information about the Company or about other companies, including our customers and suppliers whose information is available to us, is considered confidential information. The use of 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 the Company's Insider Trading Compliance Policy for more detailed information. If you are uncertain about the restrictions on your purchase or sale of any Company securities or the securities of any other company about which you have access to information by virtue of your relationship with the Company, you should consult with the Compliance Officer before making any such purchase or sale.

5. INTERNATIONAL BUSINESS LAWS

Our employees 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. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens, including their affiliates and subsidiaries outside the U.S.

These U.S. laws, rules and regulations, which extend to all of our activities outside the U.S., include:

- The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded;
- U.S. trade sanctions and embargoes, which generally prohibit U.S. companies, their subsidiaries, their employees, and third parties acting on their behalf from engaging in transactions or dealings involving certain countries and territories subject to embargoes imposed by the U.S. government (currently including, Cuba, Iran, North Korea, Syria, Russia and the Crimea region of Ukraine), as well as specific entities and individuals identified on sanctions lists published by the U.S. Department of the Treasury's Office of Foreign Assets Control;
- U.S. export controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibit transfers of U.S.-origin items to denied persons and entities; and
- Antiboycott regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

If you have a question as to whether an activity is restricted or prohibited, seek assistance from a supervisor or the Compliance Officer before engaging in the activity, including giving any verbal assurances that might be regulated by international laws.

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. The cornerstone of our Company's business is competing fairly and honestly. The Company does not engage in unethical or illegal business practices to obtain a competitive advantage. We are committed to ensuring fair competition in our markets and to following applicable antitrust and competition laws.

Certain kinds of information, such as our strategies, business plans, budgets, forecasts, financial and operating information, pricing, development and product roadmap, and related information, should not be shared with competitors, regardless of how innocent or casual the exchange may be. Compliance with regulations requires that all employees know and follow the rules that are relevant to their own business units.

7. CONFLICTS OF INTEREST

We expect our employees, officers and directors to be free from influences that conflict with the best interests of the Company or might deprive the Company 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 the Company. If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director, you should discuss the matter with your supervisor or the Compliance Officer. Supervisors may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first seeking the approval of the Compliance Officer and providing the Compliance Officer with a written description of the activity. If the supervisor is involved in the potential or actual conflict, you should discuss the matter directly with the Compliance Officer. Officers and directors may seek authorizations and determinations from the Audit Committee (the “*Audit Committee*”) of the Company’s Board of Directors (the “*Board*”), or such other committee of the Board that the Board may expressly designate.

8. CORPORATE OPPORTUNITIES

You may not take personal advantage of opportunities for the Company 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.

9. SIDE DEALS

As a Company policy, we do not accept business commitments outside of the formal contracting process managed by our internal legal department. Side deals, side letters, or other informal documentation created by employees without legal oversight are impermissible. Employees should not make any oral or written commitments that create a new agreement or modify an existing agreement without securing approval through the formal contracting process.

10. MAINTENANCE OF CORPORATE BOOKS, RECORDS, DOCUMENTS AND ACCOUNTS; FINANCIAL INTEGRITY; PUBLIC REPORTING

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, whether they relate to financial results or test results, 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 with whom we do business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- transactions be supported by appropriate documentation;
- the terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- employees comply with our system of internal controls; and
- no cash or other assets be maintained for any purpose in any unrecorded or “off-the-books” fund.

Our accounting records are also relied upon to produce reports for our management, shareholders and creditors, as well as for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the SEC. 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 collect, provide or analyze information for or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the Company that would be important to enable shareholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures. In addition:

- no employee may take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules and regulations;
- all employees must cooperate fully with our Finance and Accounting Department, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete; and
- no employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

Any employee who becomes aware of any departure from these standards has a responsibility to

report his or her knowledge promptly to a supervisor, the Compliance Officer, the Audit Committee of the Board or otherwise in accordance with the provisions of the Company's Whistleblower Policy on reporting complaints regarding accounting and auditing matters.

11. 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 the Company'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. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your supervisor or the Compliance Officer, as further described in Section 15.

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.

12. GIFTS AND ENTERTAINMENT

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage with customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theatre or a round of golf) is a common and acceptable practice as long as it is not extravagant. Unless express permission is received from a supervisor, the Compliance Officer or the Audit Committee, gifts and entertainment cannot be offered, provided or accepted by any employee unless consistent with customary business practices and not (a) of more than token or nominal monetary value, (b) in cash, (c) susceptible of being construed as a bribe or kickback, (d) made or received on a regular or frequent basis or (e) in violation of any laws. This principle applies to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our customers, suppliers and the public at large should know that our employees' judgment is not for sale.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. If you are uncertain about the appropriateness of any proposed entertainment or gifts, you should consult with your supervisor or the Compliance Officer.

13. COMPANY ASSETS

All employees, officers and directors are expected to protect our assets and ensure their efficient use. 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 the Company or any letterhead stationery for any personal purpose.

14. CONFIDENTIALITY OF COMPANY INFORMATION

As an employee, officer or director of the Company, you may learn information about the Company 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 the Company, such as cafeterias. All of the Company’s emails, voicemails and other communications are presumed confidential and should not be forwarded outside of the Company, except where required for legitimate business purposes. The Company’s employees are bound by the terms of the Proprietary Information and Inventions Agreement or similar terms that they agree to in connection with their employment.

15. CONFIDENTIALITY OF THIRD-PARTY INFORMATION AND INTELLECTUAL PROPERTY RIGHTS

The Company works with partners’, suppliers’ and customers’ proprietary data, including, but not limited to, product developments or technologies, trade secrets, financial information, business plans, personal information and operational databases. The protection of such data is of the highest importance and must be discharged with due care. It is the policy of the Company that no employee shall disclose confidential or proprietary information owned by someone other than the Company without Company authorization, nor shall any such person disclose such information to others within the Company, other than on a need-to-know basis. The Company’s employees are bound by the terms of their Proprietary Information and Inventions Agreement or similar terms that they agree to in connection with their employment that restricts disclosure of proprietary, trade secret and certain other information about the Company, its partners, suppliers and customers. This policy applies to all employees without regard to whether such agreements have been signed and is not a limitation or modification of such agreements.

It is the policy of the Company to respect the intellectual property rights of third parties, including partners, suppliers, customers and business partners. Employees have an obligation to comply with copyright, trademark, patent and trade secret laws as they pertain to third-party intellectual property. In addition, employees have an obligation to comply with the terms and conditions of licenses and other agreements that govern the use of that intellectual property.

16. CONFIDENTIALITY OF ACQUISITION AND INVESTMENT OPPORTUNITIES.

The Company may receive information in relation to potential acquisitions or investment opportunities. The protection of such information and data, including information and data of third parties, and information regarding the fact that discussions, negotiations or disclosures are taking place, is of the highest importance and must be handled only by those employees designated for such purpose by management of the Company and subject, where appropriate, to execution by such employees of a confidentiality undertaking in that respect. It is the policy of the Company that no

employee shall disclose confidential or proprietary information in relation to such investment opportunities to any third party or any other employee, unless a need-to-know basis is established and subject to specific authorization by the Company's management.

17. PLAGIARISM

Plagiarism is the act of passing off someone else's words, ideas, images or other content as one's own without crediting the source. It is the policy of the Company that its employees may not make inappropriate use of other people's ideas or words. Employees must be aware of the way to properly cite sources used in any publications.

18. OPEN-SOURCE SOFTWARE

It is the Company's policy to comply with all applicable open-source software licenses. Open-source software is generally collectively developed software with its source code made available under an open-source license. Just because open-source software is downloadable without charge does not mean we may use it without restrictions. Before downloading, using or modifying any open-source software, whether for internal use or for use in connection with product development, employees must act in accordance with the Company's internal approval process and guidelines.

19. PERSONAL DATA PROTECTION AND PRIVACY

The Company is committed to maintaining high standards with respect to privacy, particularly in connection with Personal Data of its users, customers, employees, and all other data subjects for whom it may receive and process Personal Data. As used herein, "Personal Data" means any data concerning an identified or identifiable person. All Company employees, officers, and directors ("Company Personnel") engaged in the processing or handling of Personal Data are expected to comply with the Company's data privacy policies, including without limitation the Company's Data Privacy Charter (last updated May 25, 2018). The Company's Data Privacy Charter provides core principles to be followed by Company Personnel when processing Personal Data, including principles reflecting our efforts to:

- Process Personal Data in a lawful, fair and transparent manner;
- Collect Personal Data only for specific, legitimate purposes;
- Process Personal Data that is adequate, relevant and proportionate to the purposes for which it is collected;
- Ensure that the Personal Data collected is kept accurate and up to date;
- Avoid collecting special categories of Personal Data that are subject to greater levels of protection under applicable laws;
- Delete, anonymize or otherwise terminate the storage of Personal Data once it is no longer needed for the purposes for which it was collected or other lawful purposes;
- Implement reasonable, appropriate technical or operational measures to safeguard Personal Data against accidental or unlawful access, alteration, destruction, loss, disclosure or other unlawful processing; and
- Treat Personal Data confidentially and prevent its disclosure to unauthorized third parties.

There are other, additional policies and guidelines regarding the processing of Personal Data that apply to certain Company Personnel and/or in certain regions, including policies based on local laws, regulations, customs and practices, and training programs may be conducted to promote and reinforce those policies. Those policies should be read, implemented and followed, and any questions regarding such policies should be directed to a representative of the Company's Legal Department.

20. MEDIA/PUBLIC DISCUSSIONS

It is our policy to disclose material information concerning the Company 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 financial analysts should be referred to the Chief Executive Officer, the Chief Financial Officer or the investor relations department. We have designated our communications department as our official spokespersons for all inquiries or calls from the press and for marketing, technical and other related information.

21. EMPLOYEE HEALTH AND SAFETY

Health and Safety - The Company is committed to providing a safe and healthy workplace built on a foundation of strong and uncompromising ethics and integrity. It is Company policy to strive to create an environment where employees can work in safety and comfort and to maintain a workplace safe and free from violence. The Company counts on its employees to follow all health and safety rules and notify their managers immediately of an accident, injury or illness they may experience on the job.

Drugs and Alcohol – Employees are expected to comply with the Company's guidelines regarding alcohol, drugs, and smoking, whether it is in the workplace, at Company-sponsored events, or while conducting Company business. While performing in his or her role on behalf of the Company, an employee should not be under the influence of any legal or illegal drug that impairs his or her ability to perform his or her job or duties. Employees are prohibited from manufacturing, soliciting, distributing, possessing, or using any illegal drugs or substances in the workplace, or while working on behalf of the Company.

Employee's Privacy – It is the Company's policy to balance its employees' need for privacy with the need to gather essential information. Personal information about Company employees – gathered for business, legal and contractual reasons, such as your home address and phone number, salary information, benefits information – is kept strictly confidential and shared only with those who have a legal right or a legitimate business need to know. If you have access to personal information about co-workers, you must take every precaution to ensure it is not misused or improperly disclosed.

22. ENVIRONMENT/COMMITMENT TO SUSTAINABILITY

Sustainable treatment of the environment is important to the Company, which is why we believe that we need to protect it and use our resources responsibly. Our ambition is to create lasting value for customers, employees, business partners and society in general and achieve an ecological and energy balance which is environmentally friendly and energy efficient, as much as reasonably possible. We expect that our vendors also operate and conduct their activities in an environmentally responsible and sustainable manner.

23. RESPECT FOR GLOBAL HUMAN RIGHTS

The Company is committed to promote sustainable growth, as well as responsible and transparent operations that demonstrate respect and support for all human rights. The Company recognizes its responsibility to respect human rights, and we are committed to treating our employees and members of the communities where we do business with dignity and respect. As a Company, we respect internationally recognized human rights based on the United Nations Guiding Principles on Business and Human Rights. The Company rejects all forms of discrimination in hiring and employment, slavery, child labor, threats against people who defend human rights and other human rights violations. The protection of fundamental labor rights is important to the Company. Moreover, we expect our business partners, suppliers and their subcontractors also to observe these principles and comply with all applicable labor and employment laws and regulations wherever they are based throughout the world.

The Company believes that human trafficking, forced, debt-bonded, indentured, and slave labor are unacceptable, and it is committed to preventing these practices in the Company's operations and supply chain.

24. DIVERSITY AND INCLUSION; DISCRIMINATION AND HARASSMENT

As a Company, we value diversity in our workforce and aim to provide equal employment opportunities for all qualified applicants and employees.

It is the policy of the Company to not discriminate against employees, shareholders, directors, officers, customers or suppliers or any third party on account of race, color, religion, ideology, gender, sexual orientation, age, national origin, political, social or union affiliation, physical and/or mental disability or veteran status or any other status that is protected by applicable law, regulation, or ordinance. All of such persons shall be treated with dignity and respect and they shall not be unreasonably interfered with, or harassed in any way, in the conduct of their duties and responsibilities.

It is the policy of the Company to respect the individual rights of our employees. We are dedicated to maintaining a creative, culturally diverse, and supportive work environment, and do not tolerate discrimination or harassment of employees or non-employees with whom we have a business, service, or professional relationship. Any form of discrimination, harassment or bullying goes against who we are and has no place in the Company. It is our shared duty to create a fair, tolerant, respectful and friendly working environment.

Any form of sexual harassment, including unwelcome sexual advances of either a physical or verbal nature, is strictly prohibited. Sexual harassment can cross age and gender boundaries and involve people of the opposite sex or the same sex. To ensure the protection of every employee, the applicable Company Prevention of Sexual Harassment guidelines provides details about the kinds of behaviors that are considered to be harassment. The applicable policy also provides information on how to file a sexual harassment complaint. Be sure you know, understand and follow the applicable Prevention of Sexual Harassment Policy. Details of the policy may vary according to local laws, and training is provided on a periodic basis for employees in every region.

25. ELECTRONIC PROFESSIONAL CONDUCT; USE OF SOCIAL MEDIA

The Company policy is to handle corporate information responsibly. Care should be taken in the way we communicate, both internally and externally, whether on a formal or informal basis.

To protect Company technology assets, it is the Company's policy that employees (i) use extreme caution when opening e-mail attachments from unknown or suspicious senders; (ii) use only software that is legally licensed to the Company; (iii) contact the systems administrator before installing data or software not provided by the Company; (iv) protect and not share any employee assigned passwords and personal IDs; (v) do not use another person's password; (vi) do not download files from unknown or suspicious sources; and (vii) do not send e-mails that contain offensive, harassing, illegal or otherwise inappropriate content.

Social media networks have become an increasingly important factor in public dialogue. From time to time, the Company may use social networks and social media channels to communicate with employees, business partners, customers, and the public. We expect our employees to act professionally and respectfully with both the public and our colleagues and we do not tolerate any hate-filled, derogatory or discriminatory posts on social media. We expect employees to comply with the following guidelines in their use of any social media sites: (i) employees shall be careful about what is posted on social media; (ii) only authorized employees should use social media on behalf of the Company; (iii) when participating in online communities, employees should not misrepresent themselves or their affiliation with or role in the Company; (iv) if an employee who is authorized to do so discusses work-related matters, the employee's affiliation with the Company should be disclosed; (v) employees should not share confidential, personal, privileged, proprietary or other non-public information including information about the Company, its products or services including strategies, forecasts, mergers and acquisitions and client or customer information; (vi) employees should never share any information related to legal issues, including pending litigation or investigations; and (vii) employees should not post anything discriminatory, offensive or illegal in their personal capacity or on behalf of the Company.

Where an employee posts messages or engages in dialogue on social media in a personal capacity, we nevertheless expect the employee to understand that other parties may be aware of his or her affiliation with the Company and that his or her conduct can and may be a reflection on the Company and its reputation and image. Accordingly, we expect employees using social media in a personal capacity to nevertheless comply with these rules and guidelines and in particular not to post any messages, images or other material that could be discriminatory, offensive, illegal, or in any way harmful to the Company's image or inconsistent with the core values of the Company as reflected in this Code.

We expect employees to exercise a high degree of judgment and responsibility, recognizing that their personal expressions could be misconstrued as representative of the Company's views or policies. Furthermore, employees should abstain from any online conduct that may undermine their professional integrity or credibility. This includes refraining from engaging in public controversies or debates that could reflect negatively on the Company's inclusive and respectful workplace culture. Employees should also be aware that their social media interactions may be subject to scrutiny in line with the Company's commitment to maintaining a respectful, lawful, and ethical environment both internally and in its external relations.

26. INFORMATION SECURITY

At the Company, data security and performance are extremely important. We strive to implement the highest level of security processes and practices across all business units. Our security practices are based on

industry-leading standards such as SOC2 Type II, on which we are audited annually. Our security framework includes policies and procedures, asset management, access management, physical security, people security, product security, cloud and network infrastructure security, third-party security, vulnerability management, security monitoring, and incident response. Information security policies and standards are approved by Company management, are available to all Company employees and supervised by the Company's Chief Information Security Officer (CISO).

27. SUPPLIER, AND VENDOR RELATIONSHIPS

The Company operates in many countries throughout the world. In all instances, we respect national laws and any other laws with an international reach, such as the US Foreign Corrupt Practices Act, where relevant. We are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity. We expect all our business partners, including suppliers, to have the same commitment to ethical behavior and therefore request our business partners to either confirm that they recognize our obligations and will not act detrimentally to these obligations and/or confirm that they have in place equivalent internal policies which are no less stringent than our Company Vendor Code of Business Conduct.

Each Company supplier and vendor is responsible for ensuring that all of its employees and any of its service providers and subcontractors performing work for, or related to the Company, are informed of, and agree to comply with, the requirements contained in our Company Vendor Code of Business Conduct or confirm that they have in place equivalent internal policies which are no less stringent than our Company Vendor Code of Business Conduct. The Company's policy is to assess its business partner's commitment to compliance with these requirements when making procurement decisions.

28. WAIVERS

Any waiver of this Code for executive officers or directors may be authorized only by our Board or, to the extent permitted by the rules of any stock exchange on which our ordinary shares are listed and our Corporate Governance Guidelines, a committee of the Board and will be disclosed to shareholders as required by applicable laws, rules and regulations. In some circumstances, waiver for executive officers or directors may require shareholder approval under Israeli law.

29. QUESTIONS AND REPORTING POTENTIAL VIOLATIONS

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 the Compliance Officer. We have designated our General Counsel, or if no individual currently holds such position, then our Chief Financial Officer, to the position of Compliance Officer to oversee this program. The Compliance Officer may be reached at compliance@similarweb.com.

If you are aware of a suspected or actual violation of this Code, or have concerns regarding accounting, auditing, internal accounting controls, fraud or violations of law, regulation or policy that could impact the Company's financial statements ("**Compliance Matters**"), you have a responsibility to promptly report them. It is the Company's policy to comply with all applicable laws that protect our employees against unlawful discrimination or retaliation by us or our agents as a result of their lawfully reporting

information regarding, or their participation in, investigations involving Compliance Matters. See the Company's Whistleblower Policy, as posted on our website, for further information. If any employee believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company or its agents for reporting complaints regarding Compliance Matters in accordance with this Code, he or she may file a complaint under the procedures described in the Whistleblower Policy, and we will take prompt disciplinary action against any employee, officer or director who retaliates against you. The Compliance Officer will investigate all reported possible code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances.

We have established a procedure under which complaints or concerns regarding Compliance Matters may be reported anonymously or non-anonymously. See our Whistleblower Policy, posted on the Company website, for detailed instructions on reporting such complaints or concerns, anonymously or non-anonymously. The complaint procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he or she believes is engaged in prohibited conduct under this Code. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Compliance Officer and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation. 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.

30. CHANGES; ANNUAL REVIEW

Any changes to this Code may only be made by the Audit Committee and will be recommended to the Board for approval and effective upon approval by the Board. The Audit Committee will review and reassess the adequacy of this Code at least annually, and recommend to the Board any changes the Audit Committee determines are appropriate. All changes must be promptly disclosed as required by law or regulation.

31. WEBSITE DISCLOSURE

This Code, as may be amended from time to time, shall be posted on the Company's website. The Company shall state in its annual proxy statement that this Code is available on the Company's website and provide the website address as required by law or regulation.

Last Updated: November 15, 2023

Exhibit A

SIMILARWEB LTD.

**CODE OF BUSINESS CONDUCT AND ETHICS
ACKNOWLEDGMENT**

I hereby acknowledge that I have received, read, understand and will comply with Similarweb Ltd.'s Code of Business Conduct and Ethics (the "Code").

I will seek guidance from and raise concerns about possible violations of this Code with my supervisor, management and the Compliance Officer.

I understand that my agreement to comply with this Code does not constitute a contract of employment.

Please sign here: _____

Print Name: _____

Date: _____

This signed and completed form must be returned to the Compliance Officer within ten (10) business days of receiving this Code.