MarketWise

Code of Conduct and Business Ethics

Last Updated October 26, 2026

Our Code of Conduct and Business Ethics

The Code of Conduct and Business Ethics (the "***Code***") summarized in this document represents the guiding ethical and operating principles that MarketWise, Inc. and all of our affiliates (collectively, the "***Company***") apply to our work. It helps us ensure that we interact with all of our customers, investors, business partners, and each other in a respectful, ethical, and legally sound manner.

This Code applies to everyone across the Company, including our officers, directors, executive management, managers, staff, independent contractors, and anyone else acting on behalf of our Company (collectively "***Personnel***"). You have the responsibility to conduct yourself and your business duties in accordance with this Code. MarketWise's Board of Directors adopted this Code to reflect the requirements of the Securities and Exchange Commission (the "***SEC***") and the Nasdaq stock exchange.

This Code also supports our ongoing effort to offer you and all the Personnel of the Company an enjoyable, fulfilling, safe and productive work environment. It's fundamental to helping us fulfill our mission of being the leading content and technology platform for self-directed investors—and being recognized as an employer of choice in the markets where we operate. Finally, this Code represents an important foundation for helping the Company maintain sound business practices in accordance with laws and regulations, mitigate risk, and strengthen our excellent reputation with existing clients and prospective investors.

As a member of the MarketWise community, you are required to attest annually that you have read, understand and will comply with this Code, that you will practice the highest standards of ethics and integrity, and that you will report any instances of non-compliance you observe in your role.

As part of our unwavering commitment to conducting our business ethically and legally at all times, non-compliance with any section or component of this Code, as well as other Company policies and guidelines, may lead to disciplinary action, up to and including termination of employment or terms of service.

1. DEMONSTRATING APPROPRIATE PERSONAL CONDUCT

The Company is an equal opportunity employer — we strictly prohibit and will not tolerate illegal discrimination or harassment of any kind.

We're committed to providing a workplace free of discrimination and harassment of fellow Personnel, customers, business partners, investors, contractors, and vendors.

This Code requires all Personnel to:

- treat all members of the MarketWise community with respect;
- value the perspectives and opinions of others to foster an inclusive, diverse, and productive work environment;
- conduct yourself professionally in workplace settings, including on- and off-site discussions and meetings, and electronic communications; and
- take care in presenting yourself in a responsible, respectful, and honest manner in public settings, as well as online in web-based forums, networking sites, and social media.

If you have personal social media accounts that are customer-facing, or you have clearly represented that you are employed by or a contractor of the Company, you should include a disclaimer indicating that the views you've expressed are your own and do not reflect the views of the Company.

Only authorized and assigned Personnel may communicate with the media/press on behalf of the Company. Inquiries from the media/press should be directed to the General Counsel, and/or the Chief Financial Officer. Inquiries from investors should be directed to our Chief Financial Officer.

For the safety of you and your colleagues, do not come to work or perform Company business when under the influence of alcohol or illegal drugs, or when impaired by prescription medications.

If at any time you witness or experience harassing or discriminatory behavior, speak with your manager, Human Resources, or the Legal Department.

2. COMPLYING WITH INDUSTRY LAWS AND REGULATIONS

The Company and its Personnel are obligated to comply with all applicable laws, regulations, and rules. It is your personal responsibility to adhere to the standards and restrictions imposed by these laws, regulations, and rules in the performance of your duties for the Company. This includes, but is not limited to, laws related to advertising, insider trading, and bribery. Personnel located outside of the United States must comply with laws, regulations, rules, and regulatory orders of the United States, in addition to applicable local laws.

Personnel are required to comply with:

- **The "publisher's exclusion" from the definition of "investment adviser" in the Investment Advisers Act.** Our newsletter publications must be: (1) of a general and impersonal nature, in that the advice provided is not adapted to any specific

portfolio or any client's particular needs; (2) "bona fide" or genuine, in that it contains disinterested commentary and analysis as opposed to promotional material; and (3) of general and regular circulation, in that it is not timed to specific market activity or to events affecting, or having the ability to affect, the securities industry.

- **Marketing and advertising laws, including Federal Trade Commission ("FTC") regulations.** Our marketing and advertising practices must be accurate and not unfair, deceptive or misleading.

- **Insider trading laws that prohibit trading on inside information—the buying and selling of securities while in possession of material, non-public information.** Personnel in possession of material, non-public information—about the Company or companies with whom the Company does business or companies about which our editors publish financial research—must abstain from trading or advising ("tipping") others to trade in the respective company's securities, from the time such inside information is obtained until adequate public disclosure of the information is made. "Material information" is information of such importance that it can be reasonably expected to affect the judgment of investors as to whether or not to buy, sell, or hold the securities in question.

- **Anti-corruption laws.** Personnel can never offer or accept bribes, kickbacks or illegal payments.

Personnel are also required to:

- Avoid any perception that you, as a representative of the Company, are engaging in communication in your capacity as a representative of the company or otherwise for compensation for the purpose of providing individualized investment advice to any person; and

- Comply with other laws and regulations.

Non-compliance with laws, regulations, and rules may result in criminal offenses for Personnel and/or the Company, as well as subjecting both parties to liability for damages. You are asked to report any actual or suspected violations of laws, regulations, and rules in accordance with Section 6 of this Code. When in doubt, you are encouraged to seek guidance from the Legal Department.

3. AVOIDING CONFLICTS OF INTEREST

Personnel are expected to put the interests of the Company before their own when conducting business, and to disclose conflicts of interest.

You must avoid and disclose any conflicts of interest, including any situation that may create or give the appearance of a conflict of interest between your personal and professional relationships.

A conflict of interest occurs when your private interests interfere, or appear to interfere, with the interests of the Company as a whole. Examples of conflicts of interest include, but are not limited to, you and/or a member of your family:

- receiving improper personal benefits as a result of your position at the Company;

- having a controlling or material interest in a company or organization doing business with the Company, including suppliers and service providers (i.e., an indirect conflict of interest);
- accepting compensation, in any form, for services performed for the Company from any source other than the Company;
- performing services for, or otherwise engaging in any business with, any entity (other than the Company) that engages in the publishing and/or marketing of financial and/or investment newsletters.

You must only engage in conduct or activities that are consistent with the Company's best interests and services, and that do not disrupt or impair the Company's relationship with any person or entity with which our Company has or proposes to enter into a business or contractual relationship.

Personnel may not own, either directly or indirectly, a substantial interest in any business entity that does or seeks to do business with or is in competition with the Company without providing advance notice to the Legal Department. Investments in publicly traded securities of companies not amounting to more than 1% of that company's total outstanding shares are permitted without such advanced approval.

You must also act in a fair and impartial manner in all business dealings. Gifts, entertainment, travel, and hospitality should further the business interests of the Company and not be construed as potentially influencing business judgment or creating an obligation.

- Never offer or accept gifts of cash or cash equivalents.
- No Personnel should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.
- No Personnel should take for themselves opportunities that are discovered in the course of conducting Company business.

Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Company, should be disclosed promptly with the Legal Department.

This Code does not attempt to describe all possible conflicts of interest that could develop. Personnel are encouraged to consult with the Legal Department before engaging in a situation that involves, or may reasonably be expected or perceived to involve, a conflict of interest with the Company.

4. PROTECTING COMPANY ASSETS AND INFORMATION

Personnel are required to protect any and all of the Company's assets and information and help ensure their efficient use.

Personnel must preserve the confidentiality of, and not use (except for the benefit of the Company at the Company's direction), or disclose (without written authorization of a duly authorized Company representative), any confidential information of the Company or other companies, including former employers and third parties.

The obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, ideas, designs,

databases, customer lists, records and any nonpublic financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

Personnel should share Company information only with those persons that are authorized, are required to know, or have a business reason to possess such information.

Personnel must abide by and not remove safeguards for the Company's assets and information. This includes, but is not limited to, system firewalls and virus software, building security and access devices, and other safeguarding and security controls.

Personnel are required to use Company assets and information only for their intended business-related purposes. Company systems and equipment (i.e., computers, software, computer accounts, email accounts, and internet access) should be used for business purposes, in a manner that is not detrimental to the Company in any way, not in breach of any term and condition of employment, and does not place you or the Company in breach of statutory or other legal obligations. The Company recognizes that Personnel may use its computers for limited personal use; however, Personnel should not have an expectation of privacy in anything they create, store, send, or receive via Company systems and equipment.
If Personnel resign or are otherwise released from their duties with the Company, they will be required to return to the Company any and all equipment, devices, records, data, notes, reports, proposals, lists, correspondence, memoranda, specifications, drawings, materials, other documents or property, or reproductions of any of the foregoing items belonging to the Company, its subsidiaries, affiliates, successors, or assigns. These confidentiality guidelines will be maintained even after your employment or term of service with the Company ends.

5. ENSURING FULL DISCLOSURE AND ACCURACY OF INFORMATION

Company documentation and records should be maintained completely and accurately to support transactions and the reporting of our information and financial statements.

Financial information, including financial statements, disclosures, and other documents, used for internal and external reporting, including all reports and documents filed with or submitted to the SEC, is to be full, fair, accurate, timely, and understandable. Personnel involved in the Company's disclosure process are required to maintain familiarity with the disclosure requirements, processes, and procedures applicable to the Company commensurate with their duties.

All financial books, records, and accounts must accurately reflect transactions and events, and conform both to Generally Accepted Accounting Principles ("GAAP") and the Company's system of internal controls. No entry may be made that intentionally hides or disguises the true nature of any transaction. Personnel should be as clear, concise, truthful, and accurate as possible when recording any information.

Personnel are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit material facts about the Company to others, including the Company's independent auditors, and governmental agencies and regulators.

Personnel are expected to cooperate fully, upon inquiry, with the Company's Legal Department and other Company departments, as well as the Company's independent public accountants, and any governmental agency or regulator.

Documents should not be destroyed or altered (whether on paper, email, or in any other form), in response to or anticipation of a legal proceeding or inspection by any governmental agency or regulator.

All Company documents and accounts are the property of the Company.

6. SEEKING GUIDANCE AND REPORTING MISCONDUCT

The foundation of our continued success is closely tied to our Personnel's actions—including their efforts to conduct their roles and responsibilities in an ethical and legal manner every day.

Equally important, it is up to each and every one of us to always remain vigilant, speak up, and protect the interests of the Company and our fellow Personnel.

If at any time you have questions regarding this Code, or wish to seek guidance on an ethical or legal matter, or need to report an instance of misconduct that you have witnessed or experienced personally, please take immediate steps by:

- speaking with your manager or another manager in your department, who will contact the respective affiliate Human Resources contact or General Counsel;
- contacting the respective affiliate Human Resources contact or General Counsel directly; or
- sending an email to: compliance@marketwise.com

Using the MarketWise Financial Concern Hotline

If you wish to share a concern regarding any financially-related business activity or company matters, such as inappropriate accounting of transactions, reporting of financial results, disclosures, and audit conduct, please take immediate steps using the MarketWise Financial Concern Hotline service:

- call the hotline: (833) 731-1883
- visit the hotline web portal: www.whistleblowerservices.com/mktw

All reporting is confidential and those who report can choose to remain anonymous.

The Company will not retaliate for reports made in good faith.

Retaliation or retribution against any Personnel for a report made in good faith of any suspected violation of laws, regulations, rules, or this Code is cause for appropriate disciplinary action, up to and including termination of employment or terms of service. Complete anonymity and confidentiality will be maintained at all times, subject to applicable laws, regulations, and legal proceedings.

Nothing contained in this Code is intended to limit Personnel reporting alleged violations of law to proper governmental and regulatory authorities, including the SEC, or limit Personnel's participation in any investigation or proceeding that may be conducted by such governmental and regulatory authorities, including providing documents or other information. Personnel do not need prior authorization to take such actions and are not required to notify any representative of the Company that they have taken any such actions.

Non-compliance with this Code, and/or other Company policies and guidelines, and/or misconduct by any Personnel, are subject to disciplinary action, up to and including termination of employment or terms of service, and legal action, as applicable. Personnel

are personally accountable for their adherence to this Code.

7. ENFORCEMENT

The Company must ensure prompt and consistent action against violations of this Code.

If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board of Directors.

If, after investigating a report of an alleged prohibited action by any other Personnel, the respective affiliate Human Resources contact determines that a violation of this Code has occurred, the affiliate Human Resources contact will report such determination to the General Counsel.

Upon receipt of a determination that there has been a violation of this Code, the Board of Directors or the General Counsel will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

8. WAIVERS

Waivers 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 as required by applicable rules and regulations.

CERTIFICATION OF COMPLIANCE

By digitally signing the **Code of Conduct and Business Ethics**, I acknowledge that I have received and read the Policy, and agree to comply with the terms of the Policy.