

# SHARKNINJA

## CODE OF BUSINESS CONDUCT AND ETHICS



Adopted July 28, 2023

## Contents

<b>A Message from Our President</b> .....	2
<b>SharkNinja's Purpose, Vision, and Mission</b> .....	3
<b>Our Guiding Principles</b> .....	4
<b>The Basics</b> .....	4
<b>The Rules</b> .....	7
<b><i>Our People</i></b> .....	<b>7</b>
<i>We treat each other with respect</i> .....	7
<i>We promote the health, safety, and well-being of our people</i> .....	7
<i>We are committed to diversity, equity, and inclusion</i> .....	8
<b><i>Our Community</i></b> .....	<b>10</b>
<i>We support our communities</i> .....	10
<i>We protect our planet</i> .....	10
<b><i>Our Business</i></b> .....	<b>11</b>
<i>We communicate responsibly and with one voice</i> .....	11
<i>We are transparent and truthful on social media</i> .....	11
<i>We protect Company assets</i> .....	12
<i>We protect the Company's confidential information</i> .....	13
<i>We avoid conflicts of interest</i> .....	14
<i>We safeguard privacy</i> .....	15
<b><i>We Compete Lawfully and Responsibly</i></b> .....	<b>16</b>
<i>We do not tolerate bribery or corruption</i> .....	16
<i>We follow antitrust and competition laws</i> .....	17
<i>We respect trade and export controls</i> .....	18
<i>We prevent money laundering</i> .....	19
<i>We expect the best from our business partners</i> .....	20
<i>We don't disclose nonpublic information or use it for personal gain</i> .....	20
<i>We maintain accurate books and records and we follow our controls</i> .....	22
<b><i>Declaration</i></b> .....	<b>23</b>
<b><i>Waivers and Revisions</i></b> .....	<b>23</b>
<b>Questions and Help</b> .....	23
<b>Resources</b> .....	24

## A Message from Our President

Dear Colleagues:

I am pleased to introduce the new SharkNinja Code of Business Conduct and Ethics. The Code should help you make smart choices that further our mission and raise up our colleagues, consumers, partners, and other stakeholders throughout the world.

Each of us is responsible to act ethically and to make choices that reflect our commitment to compliance and to each other. The Code of Business Conduct and Ethics is an essential resource for understanding and meeting that responsibility. It explains how SharkNinja expects you to act and to stay committed to ethical behavior while at SharkNinja. I encourage you to familiarize yourself with the Code, read it carefully, and ask questions if something isn't clear.

At SharkNinja, we exist to positively impact people's lives every day in every home around the world. We strive to deliver high-quality, reliable "5 star" rated products that delight our consumers. We realize our mission through both our singular focus on the consumer and the shared values and ethical behaviors we exhibit daily.

In our daily work, we represent SharkNinja, our brands, and each other in the communities we serve. Thank you for making the ethical decisions that reinforce our mission and for always "Doing the Right Thing".

Best regards,

Mark Barrocas  
President

## SharkNinja's Purpose, Vision, and Mission



# Our Guiding Principles

## **We follow the law.**

SharkNinja, Inc. (collectively referred to herein with its subsidiaries as “SharkNinja”, the “Company”, “we”, “us”, or “our”) is subject to national, state, provincial and local laws, rules, and regulations in the places where we do business. We strive to comply with all of them, in letter and in spirit.

## **We follow our Company policies.**

The Company has issued policies to guide us as we do our jobs. We learn those policies and follow them. If we have questions, we ask.

The Company policies discussed in this Code can be found in the SharkNinja Policy Library, which is accessible from our home page.

## **We adhere to the highest standards.**

We do what’s right. How we achieve our business goals is just as important as the goals themselves. Integrity is central to everything we do.

## **We consider ethics in everything we do.**

Ethics guides our decision-making at SharkNinja. Making ethical decisions demonstrates the Company’s commitment to operating responsibly and lawfully, builds trust with our customers and partners, protects our reputation, and is simply the right thing to do.

## **We don’t tolerate violations of the law, our policies, or our ethical standards.**

All associates have the right—and the duty—to call out suspected violations of law, this Code, or our policies. Speaking up protects you, the Company, our customers, our business partners, and our communities. We encourage you to speak up!

# The Basics

## *Do the right thing*

We all face challenging situations at work. The way we handle those situations speaks volumes about us. Our choices affect us, the Company, and our stakeholders. This Code of Business Conduct and Ethics

guides our legal and ethical decision-making. It helps us align our actions with SharkNinja's values and commitment to compliance, and it gives us tools to Do the Right Thing.

### ***Our rules apply to all of us***

This Code, the law, and our Company policies apply to every employee, officer, and director of SharkNinja (whom we refer to collectively herein as "associates"). Whatever your title, role, or position, no one is too big or too small for our rules.

### ***We're each responsible for understanding and following this Code***

You are responsible for understanding and upholding this Code. You also must abide by SharkNinja's other corporate and personnel policies and procedures. And, of course, you must always follow the law.

Violations of this Code, the law or our policies can have serious consequences for the Company and for anyone involved. If you violate this Code, Company policy, or the law, we may take disciplinary action, up to and including termination. Depending on the situation, you also could face civil or criminal legal consequences.

### ***We ask questions***

We've tried to make this Code as clear as possible, but there may be times when you're not sure what the Code requires, or what the right thing to do is. You may encounter a situation the Code does not address. If you're not sure what to do, you don't have to guess. Ask for help. It is always appropriate to seek guidance.

There are many places to go for help. You can ask your manager. You can ask People & Culture. You can ask Legal. You can send an email to [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com).

### ***We speak up***

At SharkNinja, if we have questions or concerns, we speak up!

Speaking up helps to build a healthy and ethical company and is part of our culture. SharkNinja needs you to raise questions and concerns about any situation that may violate this Code of Business Conduct and Ethics, our values, our policies, or the law. We can't address your concerns if we don't know about them. We expect all our associates and agents to speak up in all aspects of their work.

### ***How to report concerns***

There are many ways to report concerns. You can reach out to:

- Your manager
- People & Culture
- Compliance
- Legal
- The SharkNinja Ethics and Compliance Hotline (which is managed by an independent third party). You can reach the Hotline in the following ways:
  - On the SharkNinja intranet at SharkNinja Ethics and Compliance Hotline.
  - From any Internet-connected device at <https://secure.ethicspoint.com>.
  - By telephone from the United States or Canada at 855-409-0976.

- By telephone outside the United States or Canada by (1) dialing the Worldwide Connect number for your country WWC Numbers, and then (2) dialing 855-409-0976.
- Global telephone information also can be found on the SharkNinja Ethics and Compliance Hotline.

If we receive a report, we will investigate it promptly and take action as appropriate. All reports will be treated in confidence to the extent possible. You may report anonymously where permitted by law.

All SharkNinja associates are required to cooperate fully with any authorized internal or external investigation. You should never withhold, tamper with, or fail to communicate relevant information in connection with an investigation.

### ***We do not tolerate retaliation***

We are an anti-retaliation employer. The Company's policy is to avoid retaliation for making good-faith reports of a suspected violation of law, our policies, or this Code. We will take steps to protect you from retaliation for making such reports, so you can feel safe and comfortable speaking up. We will take appropriate action, up to and including termination, against anyone who retaliates against you for making a good-faith report. For additional information, review our Anti-Retaliation Policy.

Coming forward with questions or concerns can seem like a difficult decision, but it's the right thing to do. We are committed to fostering an environment that empowers associates to speak up if they observe conduct that concerns them. If you are ever aware of an instance or threat of retaliation, please report it immediately.

# The Rules

## Our People

### We Respect Each Other, Our Culture, and Our Community

#### *We treat each other with respect*

SharkNinja believes that every individual deserves respect and a workplace free from unlawful harassment, bullying or intentional disrespect of any kind. That's why SharkNinja strictly prohibits unlawful harassment.

There are many forms of unlawful harassment. Harassment includes any unwelcome conduct directed at an individual or group based on race, color, religion, national origin, sex (including pregnancy), sexual orientation or gender identity, age, disability, genetic information, or any other protected characteristic under applicable laws and regulations. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, or other offensive verbal or physical harassment of a sexual nature.

Harassment can cause serious harm to the victim and to our work environment. We do not tolerate harassment of our associates (including our applicants) by anyone, including colleagues, managers, and business partners such as suppliers and customers.

Have you witnessed someone being verbally abusive, telling inappropriate jokes, making sexual advances, being purposely disrespectful toward others, or threatening another employee or third party? These are all examples of harassment and improper conduct that we condemn. We also strongly encourage you to report any concerns or suspected violations of SharkNinja's anti-harassment policy immediately in accordance with the Company's reporting procedures.

#### **Do the right thing**

- Treat each other with respect, dignity, and courtesy.
- Resolve differences professionally. Respect our diverse characteristics, even when our cultures or ideas differ.
- Don't create an uncomfortable, hostile, or intimidating work environment through your words or actions.
- Speak up! If you have a question or a concern about harassment of any kind, report it to your manager, People & Culture, Legal, or the SharkNinja Ethics and Compliance Hotline.

#### *We promote the health, safety, and well-being of our people*

Wherever we are and whatever we do, the health, safety, and security of associates and our visitors comes first. Providing a safe and healthy work environment can only be achieved with your help. Therefore, we expect our associates to advocate for health and safety in the workplace, follow our safety policies and procedures, and comply with applicable occupational health and safety laws.



Our health and safety policies and procedures are designed to protect you and anyone on our premises. You must follow them without exception. This includes:

- Wearing the correct personal protective equipment (PPE).
- Using Company equipment (including Company vehicles) safely and properly.
- Handling hazardous substances safely.
- Following Company evacuation procedures.
- Reporting all incidents, injuries, and near misses right away.

Staying alert for potential health and safety hazards can save lives. If you see a safety hazard or unsafe behavior, report it immediately. Likewise, if you or a colleague sustain a work-related injury, report it immediately so we can take steps to protect against further health and safety issues.

SharkNinja provides a workplace that is smoke, drug, and alcohol-free. Smoking of any kind is strictly prohibited in any of our Company buildings and must only take place in designated smoking areas. Working under the influence of illegal drugs or alcohol is risky—for you and everyone else. If your judgment or abilities are impaired by alcohol or drugs (including legal drugs), you must stop work and contact your manager or People & Culture immediately. If a colleague appears to be impaired, advise your manager or People & Culture immediately.

**Do the right thing**

- Promote the health, safety, and security of our associates and visitors.
- Follow our safety policies and procedures.
- Stay alert for potential health and safety hazards.
- Speak up! If you are aware of a workplace injury or an impairment, report it your manager, People & Culture, Legal, or the SharkNinja Ethics and Compliance Hotline.

***We are committed to diversity, equity, and inclusion***

At SharkNinja, our people are our greatest asset. Our workforce comes from different cultures, backgrounds, and experiences. Diversity, equity, and inclusion are vital to our global success.

Valuing each unique voice and blending all our diverse skills strengthens SharkNinja's innovation every day. We support all our associates in bringing their authentic selves to work, making an impact, and having the opportunity for career acceleration. With help from our leadership, associates, and our community, we aim to make equity a key component of the SharkNinja DNA.

SharkNinja is an equal opportunity employer. Discrimination based on protected status is unlawful and goes against what SharkNinja stands for. That means we don't discriminate against associates, applicants, customers, or business partners based on any characteristic protected by applicable law, such as:

- Race, national origin, or ancestry
- Color

- Sex
- Pregnancy status
- Gender
- Religion
- Age
- Medical condition or disability
- Sexual orientation
- Gender identity or expression
- Marital status
- Citizenship status
- Military or veteran status
- Genetic information or characteristics

Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any associate, including managers and co-workers.

Any associate who believes they have been subjected to prohibited harassment, discrimination, or retaliation by a co-worker, manager, agent, client, vendor, or customer of SharkNinja, or who is aware of harassment, discrimination, or retaliation directed at others, should immediately notify their manager, any other management team member, or People & Culture. If we receive a report, we will evaluate the situation promptly, and undertake a thorough and objective investigation where warranted.

While we encourage you to share your concerns with the Company, you also may choose to report a concern to a government agency, such as the U.S. Equal Employment Opportunity Commission or an equivalent state agency in the United States. Government agencies generally will accept and investigate charges of unlawful discrimination and harassment at no charge to the complaining party.

#### **Do the right thing**

- Embrace our diversity and our differences.
- Value our unique voices.
- Follow the law. Afford equal employment opportunities to all qualified applicants and associates.
- Speak up! If you have a question or a concern about DEI, report it your manager, People & Culture, Legal, or the SharkNinja Ethics and Compliance Hotline.

# Our Community

We make our communities better places to live and work

## *We support our communities*

SharkNinja is committed to the communities where we live and work. SharkNinja also recognizes the value of nonprofit organizations to our communities.

SharkNinja encourages associates to get involved in their communities and support the causes that matter to them. We also strongly encourage charitable giving in your own name. But you must avoid any charitable giving in SharkNinja's name unless you have written approval from SharkNinja in advance.

Subject to Company policy and approval:

- The Company may match associate contributions to qualified nonprofit organizations.
- Full-time associates may take paid time off each year to participate in qualified volunteer programs.

### **Do the right thing**

- Get involved in your community by volunteering.
- Consider contributing to a worthy cause in your own name—and remember to check for Company matching eligibility.
- Speak up! Tell your friends and family about the great things you and SharkNinja are doing.

## *We protect our planet*

At SharkNinja, we strive to do right by our planet and act as responsible environmental stewards. The Company complies with environmental laws and puts appropriate measures in place to prevent pollution. We are committed to reducing our environmental impacts and we set ambitious sustainability goals. In partnership with our stakeholders, we promote responsible environmental management and raise awareness of key issues across the Company's value chain. We expect our business partners to comply with environmental laws and to follow sound environmental management practices.

Help us protect our planet by considering your environmental impact at work. You can help us achieve our environmental goals by making efforts to conserve resources such as water, energy, paper, and chemicals. You should always reuse materials where possible and consider the waste hierarchy when disposing of waste: reduce, reuse, recycle.

### **Do the right thing**

- Consider your environmental impact and take steps to reduce it.
- Dispose of waste properly and handle hazardous substances safely.
- If you spot any environmental hazards at work, speak up.

# Our Business

We act in the best interests of our Company and our stakeholders.

## *We communicate responsibly and with one voice*

When SharkNinja communicates with the public, we tell the truth. We speak accurately, and with integrity and transparency. We also speak with consistency.

We share our associates' enthusiasm about SharkNinja and our visionary products. However, to keep doing the amazing work we do, we must communicate responsibly with our stakeholders and the public. As a publicly traded company, we are also subject to – and follow – regulations that govern how and when we communicate certain types of information about SharkNinja to the financial community and the public. SharkNinja is committed to meeting our obligation to provide full, fair, accurate, timely, and understandable disclosure in all reports and documents that describe our business and financial results, and in other public communications. To ensure that Company communications meet our high standards, only SharkNinja's authorized spokespeople should make public statements that a listener could construe as being made on behalf of SharkNinja. If you are contacted for information or comments regarding the Company, be polite, but don't engage. Refer the person to an authorized SharkNinja spokesperson.

If you have questions or concerns, review our External Communications Policy for guidance.

### **Do the right thing**

- When you speak about the Company, speak truthfully and with integrity.
- Don't make statements on the Company's behalf unless you are an authorized spokesperson.
- If someone contacts you for information or comments, refer them to an authorized spokesperson.
- Speak up! If you think someone is trying to gain confidential information about the Company, report it your manager, People & Culture, Legal, or the SharkNinja Ethics and Compliance Hotline.

## *We are transparent and truthful on social media*

Do you use social media? Most likely. SharkNinja encourages associates to share their passion and tell the world about our exciting products. Associates are permitted to use and respond to social media, blogs, message boards, chat rooms, e-newsletters, and other digital formats to participate in online discussions using personal accounts. However, you must:

- Disclose your relationship with SharkNinja in the post (e.g., use the hashtag #iworkforSharkNinja or #work4SharkNinja) and always make this information available.
- Always state that the opinions expressed are your own and do not reflect the Company's views.

- Not disclose any confidential, trade secret or other private Company information or that of any customer or other business partner.
- Not infringe on individual property rights.
- Express yourself respectfully and avoid offensive, intimidating, or defamatory content.
- Fix any inaccuracies in the shared information.

If you have questions or concerns, review our Associate Social Media Policy for guidance. You also can speak to your manager or ask another colleague to review your post.

Lastly, if you see something on the Internet or social media about SharkNinja that you suspect might be misinformation, do not correct it yourself. Inform the Legal Team at [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com) so appropriate action can be taken.

#### **Do the right thing**

- Use common sense and good judgment.
- Speak respectfully and truthfully.
- Be transparent about your relationship with SharkNinja.
- Speak for yourself and not for the Company.
- Protect confidential information.
- Speak up! Advise Legal if you see false information about the Company.

### ***We protect Company assets***

As SharkNinja associates, we have a responsibility to protect the Company's assets and ensure their efficient use. The Company provides us with the resources we need to do our jobs. This includes, but is not limited to, our products, merchandise, Company buildings, furniture, credit cards, phones, hardware, and software. We each must safeguard the Company's assets from loss, damage, theft, misuse, carelessness, and waste.

If SharkNinja provides you with a cell phone, tablet, computer, or other device, the device remains the Company's property. You may make reasonable personal use of the device. However, by using the device, you consent that the Company (1) can reclaim the device at any time; and (2) may monitor and inspect your use of the device, including to ensure that such use has a legitimate business purpose and complies with applicable law and Company rules. Similarly, if you use a personal device for Company business or on a Company network, you consent that the Company may monitor your use and inspect the device to ensure compliance with applicable law and Company rules.

Information also can be a valuable asset. Limit sensitive Company information on a mobile device to the minimum necessary to perform your job responsibilities. Only create, store, or duplicate sensitive information in approved applications or in a SharkNinja email account. Delete sensitive information from the device when you no longer need it for business purposes. SharkNinja also applies its own business information deletion protocols and schedules.

If you have questions or concerns, review our Mobile Device Policy for guidance.

When you incur business expenses, exercise sound judgment and discretion. The Company's Travel & Expense Policy sets forth applicable expense limits in detail.

**Do the right thing**

- Safeguard the Company's assets from loss, damage, theft, misuse, carelessness, and waste.
- Limit sensitive information on mobile devices and delete sensitive information when you no longer need it for business purposes.
- Exercise judgment and discretion when you incur business expenses. Follow Company policy.

***We protect the Company's confidential information***

At SharkNinja, our confidential information is one of our most valuable assets. As SharkNinja associates, it's our responsibility to protect the Company's confidential information and to use it only for authorized purposes. Be aware that your obligation to restrict your use of SharkNinja's confidential information continues even after your employment with or service to the Company ends.

Confidential information can take many forms. It includes financial information, like pricing, sales, or projections, that has not been made public. It includes trade secrets regarding, among other things, the way we do business or plan to do business, and confidential information pertaining to our customers and business partners. It includes marketing plans. It includes information about our products, whether in the market or in development, such as product designs and innovations. It includes our patents, trademarks, and copyrights. And it includes personal information about our employees, such as their social security numbers and health-related information.

Sometimes, in doing business, it may be necessary to share confidential information with a third party. That's okay, but only when necessary to do your job and with advance authorization, and sometimes only with written permission from your manager and the Legal Team. SharkNinja generally requires a third party to sign a Non-Disclosure Agreement before we share any confidential information.

People want to know why we are so successful. Outside sources or the media may contact you for information about the Company. To prevent disclosure of inaccurate, incomplete, or confidential information, refer outside inquiries to an authorized Company spokesperson. Only an authorized spokesperson may speak on behalf of SharkNinja.

Nothing in this Code or in any SharkNinja policy is designed or intended to prevent or impede you from disclosing to any appropriate governmental agency or official information concerning any potential violation of law.

If you have any questions or concerns, review our SharkNinja Employee Handbook (United States); SharkNinja Employee Handbook (Canada); SharkNinja Employee Handbook (China); [SharkNinja Employee Handbook \(UK\)](#) for guidance.

**Do the right thing**

- Only access, use, store, or transfer information you need to do your job.
- Get advance permission before sharing confidential information with third parties.
- Refer inquiries to an authorized spokesperson.
- Speak up! If confidential information is disclosed, lost, or stolen, notify your manager and the Legal Team immediately. You can also file a report through the SharkNinja Ethics and Compliance Hotline.

***We avoid conflicts of interest***

As SharkNinja associates, we have a duty to the Company. We make our business decisions based on the Company's best interests and we don't allow our personal interests to interfere with or affect our business decisions.

All associates must conduct themselves in a way that avoids an actual or potential conflict of interest, or the appearance of any such conflict. A conflict of interest can arise if you are involved in an activity or have a relationship that prevents you from properly performing your duties at the Company, or that interferes, or appears to interfere, with your ability to make business decisions objectively, effectively, and in the best interests of the Company. Conflicts may involve personal relationships, outside employment, financial interests, or business opportunities.

Examples of potential conflicts include:

- Acting as a director, officer, consultant, agent, or associate of a supplier, customer, competitor, or any other entity that does business with the Company.
- Owning a significant interest in or being a creditor of any entity that engages in business with SharkNinja.
- Receiving from or giving to any supplier, customer, or competitor gifts, gratuities, special allowances, or discounts not generally available to associates of SharkNinja.
- Having a significant personal interest, whether direct or indirect, in a business transaction involving SharkNinja.
- Conducting Company business with a family member, close friend, or other personal contact.
- Directly or indirectly managing an associate who is employed by SharkNinja.
- Conducting outside activities that detract from or interfere with the performance of your duties or your conduct at SharkNinja.

If you have a potential conflict of interest or are considering an action that might cause or appear to cause a conflict, you should disclose the matter promptly by completing SharkNinja's Conflict of Interest

Disclosure Form. You should not engage in the potentially conflicting activity until you receive authorization to do so.

If you have any questions or concerns about conflicts of interest, review our Conflicts of Interest Policy for guidance. You also can contact the Chief Legal Officer or send an email to [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com). Directors and executive officers must comply with other rules in addition to this Code and should refer to SharkNinja's Related Person Transactions Policy for further guidance.

**Do the right thing**

- If you have a conflict of interest, promptly disclose it to the Chief Legal Officer at [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com).
- Before engaging in an activity or entering into a relationship that could be a conflict of interest, ask for guidance from the Chief Legal Officer at [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com).
- Don't do anything that conflicts with the Company's interests unless you have permission. That includes working for (or advising) a competitor, supplier, or customer.

***We safeguard privacy***

At SharkNinja, we may have access to personal information about our customers, associates, and business partners. We respect and safeguard personal information. We follow the laws regarding the collection, use, storage, and transfer of personal information. And we take every reasonable precaution to avoid improper disclosure or use.

Personal information has varying legal definitions. In general, it is any information that by itself, or in combination with other information, can directly or indirectly identify an individual. Examples of personal data include names, dates of birth, social security numbers, credit card details, email addresses, and phone numbers.

At SharkNinja, we seek consent before we collect or use any personal information. We explain what we will and won't do with it. And we only use the information in the ways we say we will.

We expect our associates to protect the privacy of customers, associates, and business partners and take precautions to keep personal information safe. Associates must follow applicable data privacy laws and the Company's Data Privacy Policy for collecting, storing, using, sharing, and disposing of personal information.

Only share personal information—inside or outside the Company—when there is a legitimate business reason and the person you share it with is authorized to access the information. And you should only retain personal information when there is a legitimate business reason. Never store personal information on a "just in case" basis. The data must also only be stored for as long as necessary to accomplish the legitimate business purpose.



Finally, if someone requests their personal information from the Company, contact your manager or People & Culture for guidance before responding.

**Do the right thing**

- Respect and protect personal information.
- Get consent before collecting personal information.
- Only collect, use, or share personal information when there's a legitimate business reason to do so.
- Don't retain personal information for longer than necessary.

## We Compete Lawfully and Responsibly

### *We do not tolerate bribery or corruption*

SharkNinja conducts business in an honest and ethical manner. We have zero-tolerance for bribery and corruption. We do not give or accept bribes, either directly or indirectly (through third parties).

SharkNinja follows all applicable laws concerning bribery and corruption, including the Foreign Corrupt Practices Act, the U.K. Bribery Act, and the PRC Criminal Law and Anti-Unfair Competition Law.

Bribery may entail offering, giving, soliciting, or receiving something of value to gain an improper advantage or to influence the way someone conducts their job or duties for the Company. Bribery can include payments to government officials or to private citizens.

A bribe can be anything of value, including gifts and hospitality. The value can be large or small. Examples include money, gift cards, a meal, entertainment, compensated travel, charitable or political donations, or an offer of employment. Free or discounted Company products also could be bribes. You may never authorize, offer, or pay a bribe.

A facilitation payment is a small payment to a government official to secure or expedite routine, non-discretionary governmental action, such as granting permits or licenses to which the payer is entitled. A facilitation payment is a kind of bribe and is prohibited.

In some places, it is customary to provide gifts or hospitality as a sign of respect. You generally may follow lawful local customs in this regard, subject to Company policies. But we don't provide gifts or hospitality to gain a business advantage or influence over a business partner.

SharkNinja limits permissible gifts or hospitality to reasonable amounts. For further information on giving and receiving business gifts or hospitality, review applicable Company policies and procedures, including our International Anti-Corruption Compliance Policy. If you are not sure whether you can accept or provide a gift or hospitality, or how to report a gift or hospitality, contact [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com).

In addition, in many places, providing gifts or hospitality to government officials is illegal or gives rise to disclosure requirements. SharkNinja prohibits providing gifts or hospitality to government officials. Exceptions to this prohibition are rare and require advance permission from the Legal Team.

If you have questions or concerns, review our International Anti-Corruption Compliance Policy for guidance, or contact [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com)

#### **Do the right thing**

- Don't pay bribes to anyone for any reason. That includes "facilitating payments".
- Don't accept bribes.
- Be careful when making gifts.
  - Do not give gifts that might influence or be perceived as influencing a business decision.
  - "Gifts" to government officials require advance approval from Legal.
  - If a non-government business partner solicits a gift or hospitality—especially if it is valuable—seek advance Legal approval.
- Don't direct or permit a third party to give or accept a bribe on our behalf.
- Keep complete, accurate, and contemporaneous records of payments and receipts, especially involving government officials. Transparency is the key.
- Speak up! If you've been solicited for a bribe or you suspect that someone else has, tell someone right away. Tell your manager or the Legal Team. You can also file a report on the SharkNinja Ethics and Compliance Hotline.

#### ***We follow antitrust and competition laws***

Antitrust laws (also called competition laws) protect consumers by ensuring fair and open competition. They prohibit a wide range of improper business practices and agreements, including, but not limited to, price fixing, bid rigging, and market allocation.

At SharkNinja, we compete fairly, ethically, and lawfully. We do not engage in improper business practices or enter into improper agreements (either explicit or implicit) with competitors, customers, or suppliers. You must always deal fairly and never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

Antitrust laws are complex. Violations can lead to significant civil and criminal penalties for the Company and for the individuals involved. They also can lead to expensive private litigation. Even the appearance of an antitrust violation can have serious consequences. Accordingly, we have a zero-tolerance policy for participation in any business conduct, transaction, or activity that violates the antitrust and competition laws of any jurisdiction where we do business.

If a competitor or a business partner raises an improper subject, stop the conversation, and report the incident immediately to the Legal Team.

If you have questions regarding the antitrust and competition laws, review our Antitrust Compliance Policy for guidance or contact the Legal Team at [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com).

#### **Do the right thing**

- Follow the antitrust and competition laws. If you aren't sure what the law requires, ask your manager or the Legal Team.
- Be careful when speaking with a customer. Understand and follow our Unilateral Pricing Plan (UPP). Don't discuss our arrangements with other customers.
- Don't discuss sales terms with competitors, especially prices or price-related strategies (past, present, or future). You also shouldn't discuss price-related topics like promotional programs.
- Take special care when you know competitors are around. Industry meetings and trade shows are good examples.

#### ***We respect trade and export controls***

Trade and export controls restrict the people that we can do business with, the places where we can do business, and the goods or services that we can sell. These controls reflect the national security and foreign policy objectives of the countries and international organizations that impose them, including the United States, China, the United Kingdom, and the European Union. In some cases, violations can carry criminal penalties.

SharkNinja is committed to compliance with applicable trade and export controls. As a U.S.-based company, we must pay particularly close attention to the U.S. rules. To meet that commitment, the Company has a strict policy against engaging in any transaction that involves:

- A sanctioned territory (which, under U.S. law as of May 1, 2023, includes Cuba, Iran, North Korea, Syria, the Crimea, so-called Donetsk People's Republic, and so-called Luhansk People's Republic regions of Ukraine, and the non-government controlled areas of the Kherson and Zaporizhzhia oblasts of Ukraine);
- A person or entity based in a sanctioned territory;
- A person or entity identified as a Specially Designated National by the U.S. Government (or an entity owned or controlled by a Specially Designated National);
- A person or entity that appears on the Consolidated Sanctions List published by the U.S. Government;
- A person or entity that appears on the Consolidated Sanctions List published by the United Nations Security Council; or
- A person or activity that would be likely to result in a breach of any applicable Trade or Export Control in a jurisdiction where SharkNinja operates.

SharkNinja also has a strict policy against engaging in any transaction or activity that is intended to circumvent or avoid applicable trade or export controls. For example, we cannot sell our products in a

sanctioned country or to a sanctioned entity by selling them to a distributor. Similarly, we cannot use a part of our Company outside the U.S. for transactions that we could not do directly from the U.S. Any exception to this policy must be approved in advance by the Chief Legal Officer.

As provided in our Trade Controls and Sanctions Compliance Policy, the Company will perform due diligence for relevant counterparties outside the United States.

If you have questions regarding trade and export controls, please review our Trade Controls and Sanctions Compliance Policy or contact the Legal Team at [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com).

#### **Do the right thing**

- Respect trade and export controls. Don't do business involving a sanctioned territory or person without advance approval from the Chief Legal Officer.
- Don't conduct transactions indirectly that cannot be conducted directly.
- Perform appropriate due diligence reviews for relevant counterparties outside the United States. If you aren't sure what the law requires, ask the Legal Team.
- Speak up! If you think we're doing business someplace we shouldn't or with someone we shouldn't, tell someone right away. Tell your manager or the Legal Team. You can also file a report on the SharkNinja Ethics and Compliance Hotline.

#### ***We prevent money laundering***

Money laundering is the process of making illegally obtained funds appear legitimate. One approach is to move funds around to conceal their origins. Another approach is to structure transactions to obscure who owns or benefits from the funds. Money laundering is illegal and can be connected to serious criminal activity, including terrorism and drug transactions.

SharkNinja complies with all applicable anti-money laundering laws, including laws that require disclosure of certain transactions (such as cash transactions greater than \$10,000). We conduct our business carefully to help prevent money laundering and other financial crimes. We rely on our associates to stay vigilant and spot red flags, including activity that does not seem to have a commercial justification or purpose. Some examples of money laundering red flags include:

- Cash transactions above or near the disclosure requirements.
- Attempts to avoid recordkeeping requirements.
- Third-party payments (payments to individuals or entities not involved in a transaction).
- Attempts to hide or withhold identification information.

If you have questions or concerns, review our Anti-Money Laundering Policy for guidance. If a transaction seems suspicious, contact the Legal Team promptly. You also can file a report on the SharkNinja Ethics and Compliance Hotline.

#### **Do the right thing**

- Watch out for unusual or unduly complicated transactions.
- Check before processing a large cash transaction or a third-party payment.
- If you think a transaction might be suspicious, or aren't sure what the law requires, ask your manager or the Legal Team. You can also file a report on the SharkNinja Ethics and Compliance Hotline.

#### ***We expect the best from our business partners***

At SharkNinja, we expect our business partners to share our values and, like us, to comply with the law and their own corporate compliance policies. To that end, we monitor the performance of each business partner throughout our relationship. It's the right thing to do. It's also the prudent thing. We could face reputational or even legal consequences from the improper actions of our business partners.

Procurement decisions must be commercially justifiable and free of improper influences such as conflicts of interest and bribery. When we seek competitive bids, we use a transparent bidding process and base our selections on our procurement guidelines. If you have questions or concerns, review our Global Vendor Review Process for guidance.

To ensure that all contractors and those in our supply chain reflect our values, our Supplier Code of Conduct is included in our standard supplier agreements.

SharkNinja also has zero tolerance for slavery and human trafficking. Therefore, we include anti-slavery provisions in our standard supplier agreements and request annual compliance certifications.

If you suspect a business partner of legal or ethical misconduct, speak up! If you have questions or concerns, review our Supplier Code of Conduct for guidance.

#### **Do the right thing**

- Expect the best from our business partners.
- Help us protect our reputation and consumer trust by selecting business partners wisely.
- Base procurement decisions on our procurement guidelines and agreements.
- Monitor business partners throughout our relationship.
- Always have zero tolerance for slavery and human trafficking.

#### ***We don't disclose nonpublic information or use it for personal gain***

In the course of your employment or service, you may learn confidential or commercially sensitive information about SharkNinja or other publicly traded companies that is not publicly available. You must keep that information confidential unless and until that information is adequately disclosed to the

public. Also, we cannot use nonpublic information for personal gain, such as buying or selling securities or advising someone else to do so.

It's generally fine to discuss your work with family and friends, but there are things you can't discuss. Disclosing the Company's trade secrets is always prohibited. Other internal business information also is subject to special protections. This is called material, nonpublic information (sometimes referred to as "inside information").

Material is essentially a legal term for "important". Information is material if its release would likely affect the market price or value of the Company's securities or if there is a substantial likelihood that the information could affect a reasonable investor's decision to buy, sell or hold the Company's securities. Examples might include financial results or guidance, new but not yet released products, the Company's legal strategies, or unannounced high-level personnel changes or mergers, acquisitions, or divestitures.

Information is nonpublic unless it has been adequately disclosed to the public. Information can still be nonpublic if certain people outside the Company, like our lawyers or accountants, know it. However, information we disclose to the public in a regulatory filing, an earnings report, or a press release is publicly available information.

You may not trade Company securities or the securities of other companies if you have material, nonpublic information about the Company or such other company. It doesn't matter how you learn the information; you cannot use it for personal gain or share it with someone else who might use it for their personal gain. If you do, you may be in violation of insider trading laws and could face a fine or even imprisonment.

Certain designated insiders who have regular access to inside information must obtain pre-approval from the Legal Team before trading Company securities. Please contact the Legal Team if you aren't sure whether this applies to you. [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com). Trading blackout periods are also implemented for certain designated insiders.

If you have questions or concerns, review our Insider Trading Policy for guidance or contact the Legal Team at [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com).

#### **Do the right thing**

- Don't discuss nonpublic information with anyone outside the Company (including your family and friends). If they use the information improperly, you—and they--may have legal liability.
- Do not share inside information with colleagues unless they need it to perform their job.
- Don't trade Company securities if you possess or have knowledge of material, nonpublic information about the Company.

### *We maintain accurate books and records and we follow our controls*

The Company always strives to create and keep its books and records with accuracy, completeness, and integrity. We rely on our books and records to make smart, lawful, and timely business decisions. And the investment community relies on our books and records to get an accurate picture of the Company's condition.

We all create records while conducting our regular business activities. For example, we file expense reports, draft contracts, develop marketing plans, and exchange emails. These documents should be accurate, truthful, complete, and timely, and conform both to applicable legal and accounting requirements and to the Company's internal controls. We must never make intentional misrepresentations or omissions. Even a seemingly small misstatement can damage your reputation and the Company's reputation and can undermine trust in all of us.

In addition, we must preserve our books and records as provided in our record retention policy and retention schedules. If you have questions or concerns, review our Document and Data Retention Policy For guidance or contact the Legal Team at [LegalQuestions@SharkNinja.com](mailto:LegalQuestions@SharkNinja.com). If you suspect any violation of this Code relating to the Company's accounting, internal controls, or auditing matters, contact the Legal Team promptly. You can also file a report on the SharkNinja Ethics and Compliance Hotline. All reports will be directed to the Chief Legal Officer in accordance with our Whistleblower Policy.

#### **Do the right thing**

- Be thoughtful and careful when you create records, including email and text messages.
- Be truthful. Fraud and falsification are unacceptable and may be illegal. Be accurate, complete, and timely when you record financial information and business transactions.
- Follow the Company's controls and procedures.
- Follow our records management policy and retention schedules when you maintain and destroy records. Never destroy records subject to a "legal hold," such as a legal hold issued for litigation purposes.

## Declaration

Thank you for reviewing the SharkNinja Code of Business Conduct and Ethics. As a SharkNinja associate, you are expected to hold yourself to a high standard and promote an ethical and inclusive culture. If you have any questions, please do not hesitate to reach out to the Compliance Team, the Legal Team or People & Culture.

## Waivers and Revisions

Waivers of this Code will be granted only in limited and compelling circumstances. A waiver must comply with all applicable laws and regulations. Waivers of the Code for executive officers or directors of the Company may only be approved in writing by the Company's Board of Directors or the applicable committee thereof. Any other waivers may be approved only in writing by the Chief Legal Officer and the executive to whom the person seeking the waiver reports.

This Code may be amended or modified at any time by the Company's Board of Directors. Any non-substantive amendments to this Code may be made by the Chief Legal Officer.

Waivers and revisions will be promptly disclosed to the extent required by applicable law, regulation or stock exchange requirement.

## No Delegation

Duties and responsibilities set forth in and required under this Code should be performed by the person designated and may not be delegated.

## Questions and Help

If you have questions about your responsibilities under this Code, ask for help. There are many places to go for guidance.

These include:

- Your manager
- People & Culture
- Compliance
- Legal
- The SharkNinja Ethics and Compliance Hotline (which is managed by an independent third party). You can reach the Hotline in the following ways:
  - On the SharkNinja intranet at SharkNinja Ethics and Compliance Hotline.
  - From any Internet-connected device at <https://secure.ethicspoint.com>.
  - By telephone from the United States or Canada at 855-409-0976.
  - By telephone outside the United States or Canada by (1) dialing the Worldwide Connect number for your country WWC Numbers, and then (2) dialing 855-409-0976.
  - Global telephone information also can be found on the SharkNinja Ethics and Compliance Hotline.

Remember, the only bad question is the one you don't ask.



## Resources

SharkNinja Policy Library
Anti-Money Laundering Policy
Anti-Retaliation Policy
Antitrust Compliance Policy
Associate Social Media Policy
Conflict of Interest Disclosure Form
Conflicts of Interest Policy
Cultural and Religious Observance Policy
Data Privacy Policy
Document and Data Retention Policy
External Communications Policy
Information Security Policy
Insider Trading Policy
International Anti-Corruption Compliance Policy
IT Support Policy
Matching Charitable Gifts Policy
Mobile Device Policy
Related Person Transactions Policy
Signature Authorization Policy
Trade Controls, Sanctions, and Anti-Money Laundering Compliance Policy
Travel & Expense Policy
Volunteerism Policy
Whistleblower Policy
SharkNinja Employee Handbook (United States)
SharkNinja Employee Handbook (Canada)
SharkNinja Employee Handbook (China)
SharkNinja Employee Handbook (UK)