



JFROG LTD.

GLOBAL CODE OF BUSINESS CONDUCT AND ETHICS

LETTER FROM THE CHIEF LEGAL OFFICER

Frogs,

Our company was founded with a mission to transform the way enterprises manage and release software updates. JFrog's liquid software journey began in 2008 and, more than a decade later, thousands of customers and millions of users worldwide have been impacted by the power of continuous updates.

To achieve this success, we operate with a unified commitment in how we treat one another, the community, the market, and the world around us. Part of living up to these commitments is understanding that how we operate every day matters. It's why I'm asking us all to take the time to carefully review JFrog's Code of Conduct.

This Code of Conduct provides information we need to operate with high ethical standards and live according to the core values enshrined in our CODEX. Our commitment to integrity is strong at JFrog! Knowing how to make the right decisions in our work protects our reputation and builds trust with our partners, customers, and each other.

Thank you for partnering with me to live out our values and continue to earn us the trust that is so critical to our continued success.

Shanti Ariker
Chief Legal and Compliance Officer

As revised: 11 February 2025

This Code of Conduct is subject to review and updates from time to time. Check that you are reviewing the most up-to-date version by accessing it directly from the JFrog Investor Relations/Governance Documents Page at <https://investors.jfrog.com/governance/governance-documents/default.aspx> .

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ABOUT OUR GLOBAL CODE OF BUSINESS CONDUCT AND ETHICS

This Global Code of Business Conduct and Ethics (“Code”) captures our commitment to ethical business conduct. It applies to you, our JFrog (“Company”) representatives, which includes all JFrog officers, directors, employees, contractors, and agents (“Frogs” or “you”). It is designed to serve as a roadmap to responsible business conduct and ethics at JFrog and help you identify and navigate some of the more challenging areas of doing business as a global technology company.

What’s your role? It’s simple - first, read the Code, complete the training assigned to you, and ensure that you understand and comply with the rules and principles in the Code and related Company policies. Second, use the principles embodied in this Code when making decisions at JFrog. Always ask yourself: is it legal, honest, and ethical? Consider the broader impact on our brand, reputation, and stakeholders before you act.

What is our commitment to you? We want to support your work at JFrog and create the optimal conditions for you to do this work with ease and peace of mind. We aim to provide clarity around some of the more thorny legal or ethical issues you might encounter and will direct you to the correct teams for support if you have questions or concerns. We will help you navigate those issues so that you can keep moving forward with confidence.

JFrog’s Chief Legal Officer serves as our Compliance Officer and can help with any questions about the Code or related policies. Your manager, the Human Resources team, and other senior managers will also be excellent sources of support and guidance about the Code. So don’t go it alone. If you have any questions about this Code or the appropriate course of conduct to keep you moving forward, be sure to reach out. We are in this together.

THE SPECIAL ROLE OF MANAGERS AT JFROG

All Frogs must follow the Code, act lawfully and ethically, and complete the required training. However, managers at JFrog have a special role in creating the conditions and culture that allow us to implement the principles and rules in the Code.

You can’t lead or manage at JFrog without adhering to the CODEX and modeling the behaviors required in this Code. If the values in the CODEX are our “north star” – setting out who we are and what we stand for, the Code is our map, showing us how to get there. We rely on our managers to serve as a guide, leading from the front as we navigate this terrain together. This means setting an example, serving as role models, listening, coaching, facilitating ethical decision-making, escalating issues appropriately, and creating a culture of psychological safety where people feel safe to share their questions and concerns and collectively learn from mistakes.

HOW TO USE THIS CODE

While you must read and apply this Code and certify that you have done so, we don’t want you to read it just once and forget about it until you are assigned some mandatory annual training. We want you to use it as a companion to everyday decision-making at JFrog. Use the table of contents to navigate the Code for specific topics, and consult it frequently as you embark on opportunities to grow our Company and serve our customers.

INTEGRITY

At JFrog, we are committed to the highest standards of integrity, which means morality, decency, and transparency. It means playing fair and owning up to mistakes. A culture of integrity at JFrog means ethical and lawful decision-making is a driver of our success.

Comply With Relevant Laws

Let's start with the relevant laws. As a first principle, you are expected to comply with all applicable laws and refrain from illegal conduct. This means you must familiarize yourself with and follow the specific laws that are relevant to your work and role.

On the rare occasion that you think there might be a conflict of laws, such as between two jurisdictions in which we operate, don't go it alone. Seek guidance from the Compliance Officer, and together, you can make the best decision and plan. If you perceive a conflict between the law and this Code, you should follow the relevant law and check in to discuss the circumstances with the Compliance Officer.

Accurate Disclosures and Reporting

Integrity means being clear, truthful, complete, and accurate with what we say and report about our Company. We can only achieve this if everyone does their part to ensure the integrity of our data for both financial and non-financial reporting.

You must never knowingly misrepresent or cause others to misrepresent facts about JFrog to others, whether within or outside the Company. Accurate and complete financial reporting is essential to maintaining the trust of our stakeholders and complying with legal and regulatory requirements. Misrepresentation, falsification, or omission of financial data is strictly prohibited. It is everyone's responsibility to ensure that financial information is handled with integrity and in accordance with our internal controls and applicable laws.

You are responsible for the accurate and complete reporting of financial information within your respective areas. If you are involved in JFrog's formal disclosure processes, such as disclosures to government agencies or regulators, self-regulatory organizations, or independent auditors, you must familiarize yourself with the applicable disclosure requirements and the business and financial operations.

If you become aware of any discrepancies or suspect unethical behavior related to financial or non-financial reporting, you must report it immediately to senior management. This is important to ensure complete, fair, accurate, and timely disclosure in reports and documents that the Company files with independent auditors and government agencies or releases to the general public. There are significant penalties and other consequences for making false statements and material misrepresentations to government agencies and investors, and we must maintain adequate internal controls to avoid this.

Together, we uphold the accuracy and transparency on which our company is built. This means you must do your part to ensure that JFrog's books, records, accounts, and financial statements are maintained in reasonable detail and accurately, fairly, and completely reflect the matters to which they relate.

Here are some important rules you must follow to help us ensure the integrity of our books and records:

- Do not establish any undisclosed or unrecorded account or fund for any purpose.
- Properly account for all company assets.
- Do not make any false or misleading entries in the Company's books and records for any reason.

- Do not directly or indirectly disburse any corporate funds without adequate supporting documentation and authorization.
- Correctly classify all transactions related to accounts, business units, or accounting periods.
- Adhere to the company's system of internal accounting and financial controls, including procurement, payment, and expense controls.
- Promptly report wrongdoing, mistakes, or errors regarding financial reporting to the Chief Financial Officer or the Compliance Officer.

Conflicts of Interest

A conflict of interest arises when you find yourself in a situation of competing loyalties. This is where a particular activity or course of action could be a benefit for you, your friends, or your family at the expense of JFrog or our customers. Examples of potential conflicts of interest include directing JFrog business to family members, pursuing board positions or outside employment without getting approval from the Company, holding significant undisclosed investments with competitors, accepting gifts or gratuities from suppliers in contravention of our gifts and entertainment policy, or unauthorized personal use of Company time or assets.

You are responsible for avoiding situations where your personal activities and relationships conflict or appear to conflict with JFrog's interests. Business opportunities that are discovered through the use of corporate property, information or position belong with JFrog, unless otherwise agreed by JFrog. You must not compete with JFrog directly or indirectly during your employment with the Company.

If you are aware of an actual or potential conflict of interest, the first step is to disclose that to the Compliance Officer and allow the Compliance Officer to review it to determine whether the conflict exists and if it can be managed. Evaluating whether a conflict of interest exists can be difficult and may involve several considerations. It is important to remember that as circumstances change, a situation that was previously not a conflict may become one. You should seek guidance from your manager or direct supervisor, the Compliance Officer, or Human Resources when you have any questions or doubts. Where a conflict of interest has been confirmed, you must obtain written approval from the Compliance Officer before engaging in that activity or accepting something of value.

Fair Dealing

Integrity also means that as a representative of JFrog, you will always deal fairly with our customers, service providers, suppliers, competitors, business partners, and employees.

At JFrog, we won't take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice. You must treat customers, competitors, partners, and colleagues fairly, with honesty, equity, and respect in all business interactions, ensuring no one receives preferential treatment.

Competition (Antitrust)

JFrog believes in the value of a fair and competitive market. Competition or "antitrust" laws are designed to foster competitive markets and prohibit activities that unreasonably restrain trade. In general, actions taken in combination with another company that unreasonably reduce competition may violate antitrust laws (for example, price fixing, geographic assignments, unfair bidding practices, "no-poach" agreements, or sharing sensitive commercial information.)

We compete fairly and don't engage in collusion or an appearance of collusion with our competitors. We won't seek competitive advantages through illegal or unethical business practices, nor seek or rely on confidential information from competitors. We refrain from promising anything of value to influence a business decision or engaging in unfair methods of competition or unfair or deceptive acts and practices. You may not engage in anti-competitive behavior and may be subject to criminal prosecution or penalties for violating competition laws. Contact the Compliance Officer if you have questions or concerns about antitrust and your work at JFrog.

Bribery and Corruption

At JFrog, we don't tolerate bribery or corruption, whether it involves a public official or a private individual. These actions go against our core values and are illegal in many jurisdictions under laws like the United States Foreign Corrupt Practices Act of 1977, the United Kingdom Bribery Act of 2010, the Israeli Penal Law, and the California Penal Code.

The JFrog Global Anti-Corruption Policy contains useful information to help navigate this area when dealing with government officials or commercial third parties. For example, under this policy, we make clear that employees are prohibited from making facilitation payments - that is, small payments paid to a government official to speed up routine, non-discretionary government activity that the official is required to perform, such as granting permits or business licenses. We also provide procedures for responsible gifting and entertainment practices to help you avoid the risks of giving or accepting excessive gifts, meals, entertainment, and travel that are not tied to a legitimate business purpose. If you have questions about JFrog's Global Anti-Corruption Policy or related controls or need guidance on working with third parties, contact the Compliance Officer or your manager for help.

Political Activities

JFrog does not contribute to political candidates or parties except as permitted by applicable laws. Particular attention must be paid to relevant campaign finance and anti-bribery or anti-corruption laws in the relevant jurisdiction. For example, in certain jurisdictions, we may be required to disclose political contributions (including recipients and/or amounts). Any contemplated contribution made on behalf of the Company or using Company funds, directly or indirectly, must be pre-approved in writing by the Chief Legal Officer in accordance with the JFrog Global Anti-Corruption Policy.

You may engage in political activity as a private citizen. An employee's personal lawful political contribution or decision not to contribute will not influence your compensation, job security, or opportunities for advancement at JFrog.

Anti-Money Laundering

Money laundering typically involves conducting a transaction to conceal the illegal origins of funds or facilitate unlawful activity. At JFrog, we are fully committed to following relevant anti-money laundering laws. We aim to do business only with trustworthy customers and partners who are involved in honest activities and use money from legitimate sources. You should avoid any transactions with persons or entities that might seem like they're hiding illegal behavior or the shady origins of money or assets. Always seek guidance from the Compliance Officer if you feel uncomfortable or see something suspicious.

Trade and Sanctions Compliance

JFrog requires compliance with applicable laws and regulations governing international trade, including US export control, sanctions, and boycott laws. Several countries control the export of hardware, software, and technology. The US maintains some of the strictest export controls against countries and certain identified individuals or entities that the US government considers unfriendly or supporting international terrorism.

As a representative of JFrog, you must comply with all applicable trade controls in your business dealings and interactions. You must not cause the Company to be in violation of those laws. Sanctions laws and export controls can be complicated, and they constantly evolve to keep up with emerging technology and geopolitics. You should always consult with the Compliance Officer regarding any proposed export of Company products or services or when considering doing business with potentially sanctioned countries or individuals. If you become aware of any information suggesting that JFrog has or may in the future engage in a transaction that could violate applicable sanctions, export controls, or relevant boycott restrictions, you should report this to the Compliance Officer immediately.

CARE

Part of being a company that cares means taking proactive steps to protect each other, our assets and information, and the assets of our customers and partners. We must work together to prevent fraud, waste, and abuse and reduce opportunities for loss or compromise - not just because it is the right thing to do and is critical to maintaining the trust of our employees, customers, and partners, but also because in many cases, it is required by law.

Protecting our Company Assets

We want to ensure you have the equipment and resources needed to do your work at JFrog, and this requires a collective responsibility to protect our assets. You should do your part to secure and safeguard JFrog's assets and ensure their efficient use. All JFrog-issued equipment (e.g., computers, hardware, cell phones, tools, etc.), media, documents, records, and information are the property of the Company. Employees should treat Company property with care, use Company equipment and systems in a productive, legal, and ethical manner, and use their best efforts to secure Company property against loss, theft, or use by persons not authorized to access it. Any suspected fraud, theft, or security compromise involving Company property should promptly be reported to your manager, direct supervisor, or the Compliance Officer for investigation. If you are not sure if you can use a Company asset for personal use, check with your manager or Human Resources.

JFrog's intellectual property rights are core to its business and success and are valuable company assets. These intellectual property rights include its trademarks, logos, patents, trade secrets, know-how, and more. You must respect all intellectual property laws during your employment at JFrog. Additionally, we respect third parties' intellectual property rights and expect you to do the same. Furthermore, we respect open-source software development. Please contact the Compliance Officer if you have any questions about intellectual property.

Data and Information Security

At JFrog, the privacy and security of our customers' data are a top priority. We need your help to keep our commitments to our customers and to comply with relevant industry standards and government regulations. This means you must prioritize protecting customer data and follow JFrog's policies and procedures on privacy, cybersecurity, cloud data processing, and responsible uses of artificial intelligence.

In carrying out the Company's business, you may learn confidential or proprietary information about the Company, its customers, suppliers, or business partners. This includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

You must maintain the confidentiality of information about JFrog and other companies or individuals that is entrusted to you. You may use that information only for permissible business purposes. Pay strict attention to any restrictions imposed by the disclosing party, and limit dissemination of the confidential information, both inside and outside JFrog, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless such disclosure is authorized or legally mandated.

You must immediately report any suspected or unauthorized uses of JFrog systems and any compromise of passwords or other access control mechanisms to your manager, the information security team, or the Compliance Officer.

Your obligation to protect confidential information does not end when you leave the Company. Any questions about whether the information is confidential should be directed to the Compliance Officer.

No Insider Trading

Insider trading, which is a criminal offense in many jurisdictions in which we operate, including under US Federal and State laws, occurs when a person makes stock trading decisions based on material non-public information. Information is considered material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold, or sell securities or would view the information as significantly altering the total mix of information in the marketplace about the issuer of the security. Any information that could reasonably be expected to affect the market price of a security is likely to be material. Either positive or negative information may be material.

As part of your work, you may come into possession of material non-public information about JFrog or its customers and partners. You must keep this information confidential and limit dissemination internally on a need-to-know basis only. You should never share it with anyone outside the Company, including friends and family. For example, if you work from home, you must ensure that other family members or guests in your household do not have access to confidential Company information.

You must comply with all insider trading and securities laws, including refraining from purchasing or selling stock based on material non-public information or recommending a stock to someone else based on any such information. Violating insider trading laws may subject you to discipline, up to and including termination of your employment. For more information on the prohibition of insider trading, see the JFrog Insider Trading Policy. You may need pre-approval for trading activities in JFrog or related securities.

External Communications

You should not speak on behalf of the Company unless expressly authorized. This means that if an outside organization or individual contacts you with a request for information, whether a reporter or journalist, a shareholder, an attorney, a government official, or even a social media influencer, you should refrain from making any statement or communication on behalf of the Company and report the contact to Compliance Officer, Chief Marketing Officer, or Chief Financial Officer.

You must not make public statements about JFrog, for example, to the Press or on social media, without express authorization from the Chief Marketing Officer or their delegate. Be careful not to inadvertently disclose confidential or proprietary information if posting images or videos on social media.

Nothing in this Code of Conduct is designed to preclude you from engaging in a disclosure to or communication with a governmental authority that is a “Protected Activity,” as described later in this Code.

Protect our Health and Safety

We are committed to providing a safe and healthy working environment for all Frogs, free from workplace violence and secure against hazards and physical safety concerns. We conduct our operations in compliance with applicable health, security, safety, and environmental laws and regulations.

All Frogs should play a proactive role to ensure we can enjoy a safe, secure, healthy, and clean workplace. You are required to comply with all safety procedures at your work location, which includes reporting unsafe conditions immediately, wearing any required personal protective equipment, refusing unsafe work assignments, actively participating in required safety training or drills, cooperating with safety investigations or corrective actions, and immediately reporting any injuries or near misses to your manager or Human Resources.

No Discrimination or Harassment

At JFrog, we are a company that cares about treating each other in a respectful manner and forging working relationships that are uniformly free of bias, prejudice, and harassment. You must treat customers, competitors, partners, and colleagues fairly, with honesty, equity, and respect in all business interactions.

JFrog prohibits discrimination against or harassment of any team member, including discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on any characteristics protected by applicable law. JFrog also prohibits retaliation against any person for making a protected complaint of discrimination or harassment.

Freedom of Association

At JFrog, our employees have a right to freedom of association. JFrog respects our employees’ right to choose to form or not to form or to join or not to join a trade union, engage in peaceful assembly, or to have recognized employee representation in accordance with local law. JFrog will not discriminate against, or otherwise penalize, employees, employee representatives, or trade union members because of their interest and/or membership, or affiliation with, an employee group or trade union.

Human Rights and Environmental Sustainability

At JFrog, our ongoing commitments to each other, the planet, and our industry create a unique opportunity and responsibility to drive humane and sustainable practices. We believe that all companies should respect core human rights and minimize their environmental impact. This is something we ask of our suppliers, and we must make sure that our operations also reflect the fundamental commitments embodied in the JFrog Statement of Human Rights and our evolving corporate social responsibility strategy. We address adverse human rights or environmental impacts and allow all Frogs to succeed with dignity at JFrog in a safe, secure, healthy, and inclusive working environment.

TEAM SPIRIT

At JFrog, Team Spirit means mutual trust, joint effort, and collaboration. These are the qualities required to bring the Code to life and ensure that it is a living, relevant document that helps us evolve to support our customers and each other. We want to know how you are experiencing the Code in practice and crowdsource risk intelligence from you to ensure we serve your needs and keep you moving forward.

Compliance and Reporting

Part of working together as a team to uphold and enforce the Code is being willing and able to discuss it in a safe and supportive environment. We encourage you to do this early and often with each other, your managers, and Company leadership. We want to be fully informed about relevant risks and the best ways to mitigate those risks so that together, we can accelerate responsible growth.

This will also reduce the opportunity for careless or inadvertent mistakes and enable us to work together to prevent violations of the Code. As a bonus, these conversations will also help Company leadership understand where there may be gaps or blindspots in our controls. You might help us identify ways to be agile and innovative and improve for everyone's benefit.

In other circumstances, you may have information about a perceived or actual violation of the Code by someone else. While we understand the natural hesitation you might have to report such a violation, it is our firm commitment to you that we will provide a safe and welcoming environment for you to do so without fear of reprisal. To uphold our values of integrity, care, and team spirit, it is essential that we address potential violations and leverage that information to learn, adapt, and continuously improve. In some cases, the information you have might be just one piece in a trend or pattern of behaviors that we need to monitor or address, so you must do your part immediately to provide a complete and accurate report of what you know or have observed.

Reporting Violations

If you know of or suspect a violation of this Code or applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls, or auditing matters), or you have a concern about a situation that you believe does not reflect JFrog's culture and values, you should report it immediately to your manager, the Compliance Officer, or Human Resources.

We have several options for you as outlined in the Anonymous Reporting Information at the end of this Code and as described in JFrog's Whistleblower Policy. You can also find information about what happens after you submit a report or complaint in JFrog's Whistleblower Policy. All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law.

Investigations

Reported violations of the Code and related policies will be reviewed and addressed. We seek fair outcomes and respect the dignity of all involved while upholding our firm commitment to enforce the Code. In some cases, more information may be needed to evaluate a concern. This may involve gathering facts and documents and speaking to witnesses. In this situation, the matter will be investigated

thoroughly, fairly, impartially, and confidentially by the appropriate team to ensure there are no conflicts of interest.

The objective of an investigation is to determine whether it is more likely than not that the alleged conduct occurred and whether it violated this Code or any other Company policies. It may also be an opportunity to assess the effectiveness of our controls and consider any lessons learned for continuous improvement.

Where a report involves potential violations by directors or executive officers, the Board of Directors will authorize and oversee relevant investigations. The Compliance Officer will authorize and oversee all other Company investigations. To preserve the integrity of corporate investigations, it is important that the person reporting the potential violation does not attempt to investigate the matter themselves. In addition, you are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law.

You are required to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. You should never withhold, tamper with, or fail to communicate relevant information in connection with an appropriately authorized investigation. Refusing to cooperate or making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators, or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

No Retaliation

The Company does not permit retaliation of any kind for good faith reports of violations or possible violations of this Code or related policies or for participating in an investigation. If you believe someone has retaliated against you, please report this as outlined above.

Consequences of Violating This Code

JFrog employees found to be in violation of this Code may be subject to disciplinary action. Moreover, employees who direct or approve any conduct in violation of this Code or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action. A director or executive officer who violates this Code or directs or approves conduct in violation of this Code shall be subject to disciplinary action as determined by the Board. If a business partner violates any JFrog rules they agreed to follow, we may end our contract with that party.

Disciplinary action may result in a range of consequences depending on the allegations and the outcome of the investigation. Disciplinary action may include counseling, training, formal verbal or written warnings, probation, suspension, debarment, demotion, reassignment, compensation clawbacks, restitution, separation from the Company or contract termination, or referral to appropriate authorities. Violations of some provisions of this Code are illegal and may be subject to civil and criminal liability.

Protected Activity Not Prohibited

We encourage you to use the avenues outlined above to report potential violations of this Code to help JFrog uphold its commitments in the Code. However, nothing in this Code limits or prohibits you from engaging for a lawful purpose in any “Protected Activity.”

“Protected Activity” means filing a charge or complaint or otherwise communicating, cooperating, or participating with any state, federal, or other governmental agency (including in the US, the Securities and Exchange Commission, the Equal Employment Opportunity Commission, and the National Labor Relations Board). Notwithstanding any other policies in this Code (or elsewhere), employees are **not** required to obtain authorization from the Company prior to disclosing information to or communicating with such agencies, nor are employees obligated to advise the Company as to any such disclosures or communications. Notwithstanding, in making any such disclosures or communications, employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company confidential information to any parties other than the relevant government agencies.

“Protected Activity” does not include the disclosure of any Company attorney-client privileged communications; any such disclosure, without the Company’s written consent, violates Company policy.

CODE GOVERNANCE

Code Waivers, Modifications, and Acknowledgement

The Company reserves the right to amend this Code at any time, for any reason, subject to applicable laws, rules, and regulations.

The Board of Directors or a delegate must approve any substantive modification of this Code or any waivers of any part of this Code for Executive Officers, Senior Financial Officers (CFO, Controller, Head of Internal Audit, or similar roles), or members of the Board of Directors. All such modifications or waivers must be publicly disclosed by publication on the JFrog website or by filing a current report on SEC Form 8-K pursuant to applicable SEC and stock exchange rules.

All new employees must sign an acknowledgment form confirming that they have read this Code and that they understand and agree to comply with its provisions. Signed acknowledgment forms will be kept in employee personnel files. Failure to read this Code or to sign an acknowledgment form does not excuse any person from the terms of this Code.

Revision History and Version Control

Title	JFrog Global Code of Business Conduct and Ethics	Effective Date	February 11, 2025
Owner	Shanti Ariker, Chief Legal Officer	Approved By	Board of Directors
Questions	Shanti Ariker, Chief Legal Officer	Version	2:0

CODE EXHIBITS

- A. Anonymous Reporting Information
- B. A Simple Decision Tree for Ethical Decision-Making
- C. Employee Acknowledgement

ANONYMOUS REPORTING INFORMATION

If you know of or suspect a violation of this Code or applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls, or auditing matters), or you have a concern about a situation that you believe does not reflect JFrog’s culture and values, you must report it immediately to your manager, the Compliance Officer, or Human Resources. If you prefer to make a report anonymously, you have the following options.

<p>Submit your report on the Company’s confidential and secure web portal, run by Navex, an independent third party, at jfrog.ethicspoint.com</p> <p>You may submit a hotline report in your local language.</p>	<p>If you send an anonymous report in confidence via EthicsPoint, the information you provide will be sent to JFrog by Navex on a completely confidential and anonymous basis.</p> <p>You must select yes to the question below in the form to remain anonymous when using this portal.</p> <p>* Do you wish to remain ANONYMOUS for this report?</p> <p><input type="radio"/> Yes <input type="radio"/> No</p> <p>If you make this selection, you will be given the option of providing a personal email address. Your email will be included with your report to your organization but will be held by Navex, subject to Navex's Terms and Conditions. Providing a personal email address is not required to make a report, but it enables Navex to notify you by email of updates or follow-ups to your report.</p> <p>After you complete your report in EthicsPoint, you will be assigned a unique code called a "report key." Write down your report key and password and keep it in a safe place. After 5-6 business days, you can use your report key and password to check your report for feedback or questions. If you lose your "report key," you will not be able to access your file or receive updates.</p>
<p>Submit your report using the Company’s secure telephone hotline, run by Navex, an independent third party.</p> <p>You may submit a hotline report in your local language.</p>	<p>USA and Canada: 1-833-823-2600 Israel: 1-809-322-255 India: 022 5029 0248 United Kingdom and N. Ireland: 0-808-281-3418 France: 0800 90 18 20 Germany: Direct Access: 1. From an outside line, dial the direct access number for your location: 0-800-225-5288 2. At the English Prompt, dial 844-787-0328 Spain: 900-751-343 Japan: Direct Access: 1. From an outside line, dial the direct access number for your location: 00-663-5111 2. At the English Prompt, dial 844-787-0328 China: 4001200171</p> <p>You may also access these numbers via the drop-down at jfrog.ethicspoint.com</p> <p>After you complete your hotline report in EthicsPoint you will be assigned a unique code called a "report key." Write down your report key and password and keep it in a safe place. After 5-6 business days, you can use your report key and password to check your report for feedback or questions. If you lose your "report key," you will not be able to access your file or receive updates.</p>
<p>Submit your report using regular mail or courier to the Compliance Officer or Audit Committee Chair.</p>	<p>You may also report your Complaint by mail to JFrog Ltd., 270 East Caribbean Drive, Sunnyvale, California 94089, Attn: Compliance Officer.</p> <p>If your Complaint relates to accounting, internal controls, or auditing matters, or if the Complaint implicates the Compliance Officer, you may also contact the Chairperson of the Audit Committee by mail to: JFrog Ltd., 270 East Caribbean Drive, Sunnyvale, California 94089, Attn: Chairperson of Audit Committee.</p>

A SIMPLE DECISION TREE FOR ETHICAL DECISION-MAKING

1. Identify the Issue

- Is this a decision that could negatively impact you, others, the company, or our stakeholders?

If **Yes**, continue to step 2.

If **No**, proceed with the decision.

2. Check the Rules

- Does a company policy, law, or regulation apply to this situation?

If **Yes**, follow the policy or rule.

If **No**, continue to step 3.

3. Consider the Values

- Does this action align with JFrog's values (e.g., integrity, care, team spirit)?

If **Yes**, continue to step 4.

If **No**, reconsider the action or seek advice.

4. Think About the Impact

- Could this decision harm or embarrass anyone (JFrog, customers, employees, community)?

If **Yes**, reconsider or adjust the decision to avoid harm or embarrassment.

If **No**, continue to step 5.

5. Seek Guidance

- Are you unsure or uncomfortable about the decision?

If **Yes**, ask your manager or the Compliance Officer for advice.

If **No**, proceed with the decision.

KEY TIP: Don't go it alone. If at any time during the steps on the decision tree, your answer is that you do not know or do not have sufficient facts, reach out for help from a manager or the Compliance Officer

EMPLOYEE ACKNOWLEDGEMENT



GLOBAL CODE OF BUSINESS CONDUCT AND ETHICS

EMPLOYEE ACKNOWLEDGEMENT

- I acknowledge that I have received and read JFrog’s Global Code of Business Conduct and Ethics (“Code”).
- I acknowledge that I understand the standards, policies, and procedures contained in the Code, and I understand that there may be additional standards, policies, procedures, and laws relevant to my position.
- I agree to comply with the Code.
- I acknowledge that if I have questions concerning the meaning or application of the Code, any Company policies, or the legal or regulatory requirements applicable to my position, it is my responsibility to seek guidance from my manager or direct supervisor, the Compliance Officer, or Human Resources.
- I acknowledge that neither this Acknowledgment nor the Code of Business Conduct and Ethics is meant to vary or supersede the regular terms and conditions of my employment by the Company or to constitute an employment contract.

Please review, sign, and return this form to Human Resources.

(Print Name)

(Signature)

(Date)

This Code of Conduct is subject to review and updates from time to time. Check that you are reviewing the most up-to-date version by accessing it directly from the JFrog Investor Relations/Governance Documents Page at <https://investors.jfrog.com/governance/governance-documents/default.aspx> .