



## **MONGODB, INC.**

### **CODE OF BUSINESS CONDUCT AND ETHICS**

#### **APPROVED BY THE AUDIT COMMITTEE OF THE BOARD OF DIRECTORS (AS AMENDED, EFFECTIVE MAY 21, 2026)**

### **MongoDB Code of Business Conduct and Ethics**

In pursuing our mission, we strive to achieve the highest business and personal ethical standards as well as compliance with the laws and regulations that apply to our business. This MongoDB Code summarizes the business practices and regulatory requirements that guide our decision-making and business activities. We, as employees, officers, directors, volunteers and all other company agents and representatives, are expected to act in conformity with the principles expressed in this MongoDB Code of Business Conduct and Ethics (the “MongoDB Code”). In addition, in acting as leaders, we are responsible for helping our fellow employees understand and comply with the MongoDB Code.

This MongoDB Code is an overview of MongoDB’s principles of business conduct and ethics; it is intended to set standards of conduct and is not a restatement of all of MongoDB’s policies and procedures. This MongoDB Code cannot and is not intended to cover every applicable law or provide answers to all questions that might arise; for that we must ultimately rely on each person’s good sense of what is right, including a sense of when it is proper to seek guidance from others on the appropriate course of conduct.

If you have any questions regarding this MongoDB Code or its application to you in any situation, you should contact your Manager, MongoDB’s Legal team or Human Resources leadership.

### **Compliance with Laws, Rules and Regulations**

Acting ethically and obeying the law, both in letter and in spirit, is a core value of MongoDB and the basis for this MongoDB Code. Our success depends upon each person operating within ethical and legal guidelines. We expect employees to understand the legal and regulatory requirements applicable to their area of responsibility, including federal, state and foreign laws. It is also the obligation of each and every director, officer and employee of MongoDB to become familiar with the goals and policies of the company and integrate them into every aspect of our business. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

MongoDB regards violation of the law, company policies or this MongoDB Code as a serious matter since violations may put the company and employees at risk. Any violation may subject you to disciplinary action and possible dismissal. Those who work with us, such as contractors, consultants, agents, volunteers, representatives and suppliers, are also required to follow these standards. Certain violations may be referred to legal authorities for investigation and civil or criminal prosecution. If you become aware of the violation of any law, rule or regulation by MongoDB, whether by its officers, employees or directors, or any third party doing business on behalf of MongoDB, it is your responsibility to promptly report the matter to your manager or to MongoDB’s Legal Department. Managers must promptly report any complaints or observations of violations of this MongoDB Code to

the Legal Department. If your concern involves potential misconduct by another person and relates to questionable accounting or auditing matters at MongoDB, you should report that violation in accordance with the procedures outlined in MongoDB's Accounting & Auditing Whistleblower Policy.

While it is MongoDB's desire to address matters internally, nothing in this MongoDB Code should discourage you from reporting any illegal activity, including any violation of the securities laws, antitrust laws or any other federal, state or foreign law, rule or regulation, to the appropriate regulatory authority. This MongoDB Code should not be construed to prohibit you from testifying, participating or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

### **Insider Trading**

Subject to the terms of our Insider Trading Policy, those of our employees, officers, directors or other MongoDB representatives who have access to confidential (or "inside") information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. All material, nonpublic information about MongoDB or about companies with which we do business is considered confidential information. To use material, nonpublic information in connection with buying or selling securities, including "tipping" others who might make an investment decision on the basis of this information, is both unethical and illegal. You must exercise the utmost care when handling material inside information. You should consult our Insider Trading Policy for more information on the definition of material, nonpublic information and on buying and selling our securities or securities of companies with which we do business.

### **Prediction Markets**

Prediction markets are online platforms where individuals can place bets on the outcome of real-world events, such as elections, sports, economic trends, and corporate developments. To help protect you, MongoDB, and our culture from the risks associated with Prediction Markets, and subject to the terms of our Insider Trading Policy, employees, officers, directors, or other representatives who have access to inside information are not permitted to use or share that information to participate in prediction markets. This includes bets related to MongoDB, regardless of whether you possess inside information (for example, product launches, financial results, strategic transactions, or employee matters). You also may not place bets on events or companies outside of MongoDB about which you have inside information resulting from or in connection with your role at MongoDB, such as third-party product development, partnerships, or acquisitions.

### **Trade Practices and Antitrust Compliance**

MongoDB supports vigorous, open and fair competition. When representing MongoDB in the community, you are expected to compete energetically by promoting MongoDB on the merits, not by disparaging competitors. Product or service comparisons should be fair and accurate. Outside the U.S. there are further constraints under comparative advertising regulations.

MongoDB is subject to laws which regulate the free enterprise system by removing artificial restraints on competition or restraints on the free movement of goods and services. These laws, known as antitrust or trade practice laws, deal with agreements and practices which prevent free and fair trade, such as price fixing, discriminatory pricing, and certain tie-in sales.

Competitive information must be gathered with care. We must conduct all interactions with competitors, including social activities, as if they were completely in the public view, because they may later be subject to examination and unfavorable interpretation. Indeed, discussions of certain topics (such as prices) with competitors may be illegal. Any activity in violation of these laws is prohibited. If there is any doubt about the legality of a situation, please contact MongoDB's Legal Team.

All MongoDB purchases should be made strictly on the basis of quality, suitability, service, price and efficiency. As discussed below, any actual conflict of interest in making a purchase on behalf of MongoDB is prohibited. You should also be careful to avoid any perceived conflict of interest as that would impact your reputation and MongoDB's image. We should treat our suppliers fairly and equitably. It is MongoDB policy to award orders and contracts on the basis of merit and without favoritism.

## **Worldwide Operations**

MongoDB's business operations must comply with the laws and practices which exist in many different locations. Certain U.S. laws also regulate MongoDB's business conduct outside the United States. The major U.S. laws which are applicable to MongoDB's overseas business include the Foreign Corrupt Practices Act ("FCPA"), Export Administration Regulations ("EAR") and regulations of the Office of Foreign Assets Control ("OFAC") of the Department of Treasury. The FCPA generally prohibits payments to foreign government officials in order to influence a governmental or official act or to otherwise obtain or retain business, direct business to any person, or secure any improper advantage. Federal controls under the EAR regulate exports of products and technical data from the U.S. and the re-export of these items from one foreign destination to another. OFAC administers trade sanctions and embargoes programs against certain designated countries, entities, and individuals, with whom transactions and dealings are generally prohibited. Each employee must comply with the MongoDB Global Anti-Bribery & Anti-Corruption Policy and applicable export control, sanctions, and other international trade laws, which are described further below. If you have any questions regarding this area, please contact MongoDB's Legal Team.

## **Honest and Ethical Conduct and Fair Dealing**

Employees, officers and directors should endeavor to deal honestly, ethically and fairly with MongoDB's suppliers, customers, competitors and employees. Statements regarding MongoDB's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. You also must never create or submit false, inaccurate, or misleading invoices, receipts, or other financial or business-related documents to the Company.

## **Anti-Bribery and Anti-Corruption Laws**

We are committed to maintaining the highest level of professional and ethical standards in the conduct of our business in all countries in which we operate or otherwise have business connections including the United States and other countries around the world. Our reputation for honesty, integrity, and fair dealing is an invaluable component of our financial success, and of the personal satisfaction of our employees. To this end, it is important for all of our employees, officers, directors, and third party agents to understand and comply with all applicable anti-bribery and anti-corruption laws and never pay bribes or attempt to get or keep business or secure any advantage by attempting to improperly influence government officials, customers, business partners, or any other person. As discussed in the Company's Global Anti-Bribery and Anti-Corruption Policy, there are special rules to follow when dealing with or providing things of value (including business hospitalities) to government officials or to private persons. Please consult the Company's Global Anti-Bribery and Anti-Corruption Policy for guidance and the Company's policies regarding interactions and dealings with, and provision of gifts, meals, travel, and other benefits to, foreign and U.S. government officials and private persons (including customers), and reach out to the Legal Department with any questions.

While we do not expect every person in the Company to become an expert in anti-corruption laws, we do expect every employee to adhere to the Company's ethical standards, to be cognizant of these anti-corruption laws and other applicable laws that relate to the issue of improper payments, and to seek guidance from the Legal Department whenever any uncertainty regarding those laws or standards arises. The penalties for not complying with anti-corruption and anti-bribery laws may be severe for both the Company and the individuals involved. If you have any questions regarding your or the

Company's ethical and legal obligations under anti-bribery laws or Global Anti-Bribery & Anti-Corruption Policy, please consult with the Legal Department.

### **Books and Records and Internal Accounting Controls**

It is very important that the Company's books and records accurately reflect the transactions and expenses of the Company. In fact, the FCPA requires public companies to maintain an accounting system that ensures reasonably detailed and accurate records of all financial transactions and a system of internal accounting controls that protects against off-book accounts and disbursements and other unauthorized payments. The Company is committed to complying with these rules. Thus, MongoDB employees are prohibited from creating or submitting false or inaccurate documentation (e.g., invoices, purchase orders, expense reimbursements, etc.) in connection with our business activities. Please consult the Company's Global Anti-Bribery and Anti-Corruption Policy for guidance and the Company's policies regarding the maintenance of books and records and internal controls.

### **Accurate Financial and Accounting Disclosures**

Our principal executive officer, principal financial officer and people who perform similar functions are our "senior financial officers" and are responsible for ensuring that disclosures in our periodic reports and other public communications are full, fair, accurate, timely and understandable.

### **Trade Restrictions**

A number of countries maintain controls on the users and destinations to which products or software may be exported. This includes the U.S. Government that has in place export control laws and regulations, including the EAR administered by the Department of Commerce, designed to ensure that transfers of products, services and technology are accomplished in a manner that is consistent with national security and foreign policy goals. Some of the strictest export controls are maintained by the United States against countries that the U.S. government considers unfriendly, adverse to U.S. foreign policy interests, or to be supporting international terrorism. These controls include the trade and economic sanctions administered by OFAC. The U.S. regulations are complex and apply to transfers of goods and technology to foreign companies and foreign persons, whether in the United States or abroad. Thus, even an oral presentation containing technical information made to foreign nationals in the United States or access by foreign nationals to certain technology may constitute a deemed export. The Company's products also use encryption, and as such often require certain U.S. authorizations before they can be exported. Additionally, the Company may not conduct any business without first obtaining approval from the Legal Department and likely the U.S. government in Cuba, Iran, Syria, North Korea, Sudan, or the Crimea Region of Ukraine. Finally, licenses are required before the Company can export to certain restricted end-users. The Legal Department can provide you with guidance on the relevant prohibitions and requirements regarding these and other countries, regarding the export of the Company's products and services, and whether a proposed technical presentation or the provision of controlled technology to foreign nationals may require a U.S. government license. The penalties for not complying with the U.S. export controls and economic sanctions laws may be severe for both the company and the individuals involved. As such, Company employees must comply with these rules. Please contact the Legal Department for additional guidance or if you have questions.

### **Conflicts of Interest**

Employees, officers and directors must act in the best interests of MongoDB. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest." A conflict of interest occurs when your personal interest interferes, or appears to interfere, with the interests of MongoDB, including when an employee, officer, or director, or a member of his or her family, receives improper personal benefits as a result of his or her position in the company. A conflict of interest can also arise whenever you take action or have an interest that prevents you from performing your MongoDB duties and responsibilities honestly, objectively and effectively. Specific situations that could

be considered conflicts of interest include:

- | Accepting gifts and services from suppliers or contractors;
- | Employment by or ownership of a business (other than minimal stock ownership for investment purposes), that competes with MongoDB;
- | Use of company assets for personal purposes;
- | Selection of suppliers and persons seeking to do business with the company based on any considerations other than the best interests of the company;
- | Speaking with analysts, investors, equity research firms, media and other members of the public about MongoDB, regarding material information or otherwise, whether or not any incentive (financial or otherwise) has been received in exchange. *Note: Please also refer to the section titled "Corporate Communications" below.*

Additionally, certain situations may not be in the best interest of MongoDB when it appears to persons outside the company that a conflict exists. In these situations, you should apply the principles of this MongoDB Code in deciding how to correct the situation with the goal of promoting MongoDB's best interest.

In the interest of clarifying the definition of "conflict of interest," if any member of MongoDB's Board of Directors (the "Board") who is also a partner or employee of an entity that is a holder of MongoDB common or preferred stock, or an employee of an entity that manages such an entity (each, a "Fund"), acquires knowledge of a potential transaction (investment transaction or otherwise) or other matter other than in connection with such individual's service as a member of the Board (including, if applicable, in such individual's capacity as a partner or employee of the Fund or the manager or general partner of a Fund) that may be an opportunity of interest for both MongoDB and such Fund (a "Corporate Opportunity"), then, provided that such director has acted reasonably and in good faith with respect to the best interests of MongoDB, such an event shall be deemed not to be a "conflict of interest" under this policy.

MongoDB abides by the securities laws that govern conflicts of interest by our executive officers and directors. As a result, the actions or relationships that will be considered conflicts with respect to our executive officers and directors are only those that meet the requirement for disclosure in our periodic filings with the SEC pursuant to Item 404 of Regulation S-K, referred to as related person transactions. Such related person transactions must be approved or ratified by the Audit Committee as required by applicable laws and regulations and consistent with the Company's policies. In the event such transaction is approved or ratified, it shall not be deemed a waiver of this Code. It is your responsibility to disclose any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest to the Chief Executive Officer or Legal Team or, if you are an executive officer or a member of the Board of Directors, to the Audit Committee of the Board of Directors, who shall be responsible for determining whether such transaction or relationship constitutes a conflict of interest. If you are unsure about whether conduct may be in violation of this policy, please contact the Legal Department.

### Gifts, Entertainment, Travel and Gratuities

MongoDB's employees and third parties are permitted to provide reasonable, modest gifts, entertainment, travel, and gratuities for legitimate, *bona fide* business purposes to private persons, if such expenditures are properly booked in the Company's books and records. If the expenditure exceeds US\$200.00 per person in value, you must obtain pre-approval from the Legal Department or the Chief Financial Officer. Cash gifts to private persons are strictly prohibited.

As noted above in the Anti-Bribery and Anti-Corruption Laws section, consistent with the Company's *Global Anti-Bribery & Anti-Corruption Policy*, MongoDB employees and third parties must first obtain pre-approval from the Legal Department prior to providing anything of value to a government official, foreign or domestic. Common sense and moderation should prevail in business entertainment engaged in on behalf of MongoDB. Employees, officers and directors should provide, or accept, business

entertainment to or from anyone doing business with MongoDB only if the entertainment is infrequent, modest and intended to serve legitimate business goals.

Likewise, employees, officers and directors must not accept, or permit any member of his or her immediate family to accept, any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with MongoDB, other than items of nominal value, generally less than US\$100.00. Any gifts that are not of nominal value should be returned immediately and reported to your manager. If immediate return is not practical, they should be given to MongoDB for charitable disposition or such other disposition as MongoDB believes appropriate in its sole discretion. Bribes and kickbacks are criminal acts, strictly prohibited by law. You must not offer, give, solicit or receive any form of bribe or kickback anywhere in the world. Each employee must comply with the MongoDB Anti-Bribery & Anti-Corruption Policy and seek guidance from the Legal Department should you have any questions or concerns.

### **Protection and Proper Use of Corporate Assets**

We all have a duty to protect MongoDB's assets. Theft, carelessness and waste have a direct impact on MongoDB's financial performance. Employees, officers and directors must use MongoDB's assets and services solely for legitimate business purposes of MongoDB and not for any personal benefit or the personal benefit of anyone else.

Employees, officers and directors must advance MongoDB's legitimate interests when the opportunity to do so arises. You must not take for yourself personal opportunities that are discovered through your position with MongoDB or the use of property or information of MongoDB.

### **Confidentiality**

Employees, officers and directors must maintain the confidentiality of confidential information entrusted to them by MongoDB or other companies, including our suppliers and customers, except when disclosure is authorized by a manager or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees and contractors must take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to MongoDB or another party for whom MongoDB has agreed to maintain confidentiality, such as a customer, is communicated within MongoDB only to those employees who have a need to know such information to perform their responsibilities for MongoDB.

All MongoDB emails, voicemails and other communications are presumed confidential to MongoDB and should not be forwarded or otherwise disseminated to individuals outside of MongoDB, except where required for MongoDB-related business reasons. Similarly, all customer and supplier information is confidential information and might also include personally identifiable information which you are legally required to protect and keep confidential. You also must abide by any lawful obligations that you have to your former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at MongoDB and non-competition obligations.

Your obligation to treat certain information as confidential does not end when you leave MongoDB. You may not disclose any confidential information to a new employer or to others after ceasing to be a MongoDB employee, director or consultant.

All employees are required to sign an Employee Invention Assignment, Confidentiality and Arbitration Agreement with MongoDB which provides additional detail on your confidentiality obligations that are not contained in this MongoDB Code.

## Use of Company Technical Resources

It is extremely important that you take all necessary measures to ensure the security of your computer and any computer or voicemail passwords. You must use caution when sending sensitive or confidential information in any messages that are widely distributed or sent outside MongoDB. If you have any reason to believe that your password, credentials or the security of a MongoDB technological resource has been compromised, then you must contact your manager and follow the documented incident response procedures.

Whenever you use a MongoDB computer or communications resource to send e-mail, voicemail or to access Internet services, remember that you are acting as a representative of MongoDB. Your use of MongoDB resources could reflect poorly on MongoDB, damage our reputation, and expose you personally and MongoDB to legal liability. In addition, all e-mail, voicemail and files stored on MongoDB computers are MongoDB's property. You should therefore have no expectation of privacy in connection with these resources. The use of technological resources must be consistent with all other MongoDB policies, including those relating to sexual harassment, privacy, patents, copyrights and trademarks. You are prohibited from using MongoDB's technological resources to transmit, display, store, publish or purposely receive pornographic, obscene or sexually explicit material.

## Dignity at Work

At MongoDB, creating and maintaining a work environment that aligns with our [core values](#) and [leadership principles](#) is paramount. They are the foundation of our organizational culture at all levels and apply to how we engage, both internally and externally, with colleagues and customers. We aim to provide a work environment where everyone can work confidently and to the best of their abilities, knowing there are safeguards from bullying, harassment, sexual harassment, discrimination, and workplace violence. We want to ensure that employees feel empowered to report any instance of such behavior. Addressing these issues as soon as possible helps to resolve individual concerns, contributing to the overall well-being of our workforce.

Our Dignity at Work Policy demonstrates our commitment to implementing and promoting measures to protect the dignity of employees and to encourage respect for others at work alongside an understanding of how we investigate any concerns raised. Certain countries may have MongoDB policies in place that focus on the specifics for your country. To the extent there is a conflict between this policy and the MongoDB policy of individual countries, local policies are applicable.

This policy also explains our procedures for dealing with complaints of bullying, harassment, sexual harassment, discrimination, and workplace violence.

We are dedicated to creating a safe, respectful, and supportive environment. For more information please see the Dignity at Work Policy located on the Wiki.

## Corporate Communications

Due to the importance of effective and accurate communications by MongoDB with the financial community and the general public only those individuals designated by MongoDB as a Spokesperson (defined below) are authorized to communicate with industry research analysts and the news media and to issue written public statements (most often as press releases) about MongoDB. Moreover, unless designated as a Spokesperson, MongoDB employees with the title of Vice President and above are, under no circumstances, authorized to communicate with equity research firms.

MongoDB has designated each of the following individuals as authorized MongoDB "Spokespersons":

- (i) Chief Executive Officer and President;
- (ii) Chief Financial Officer;
- (iii) Chief Marketing Officer;

- (iv) Chief Technology Officer;
- (v) Vice President, Global Corporate Marketing; and
- (vi) General Counsel

MongoDB's CFO is responsible for interactions with investors and financial analysts. Refer all inquiries to Corporate Communications, who will answer or route them to the appropriate MongoDB Spokesperson.

For more information please see the Corporate Disclosure Policy located on the Wiki.

### Waivers of this MongoDB Code

Any amendment or waiver of any provision of this MongoDB Code must be approved in writing by the Board or, if appropriate, its delegate(s) and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of the code for a director, executive officer or senior financial officer will be promptly disclosed to stockholders if and as required by applicable law or the rules of any stock exchange on which any of MongoDB's capital stock is listed.

### Reporting and Compliance Procedures

Every employee, officer and director has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this MongoDB Code. Any employee, officer or director who knows or suspects that any other employee or representative of MongoDB has engaged or is engaging in Company-related conduct that violates applicable law or this MongoDB Code should report such information to his or her manager, to the Human Resources Department or the MongoDB Legal Team, as described below.

You may report such conduct openly or anonymously without fear of retaliation. MongoDB will not discipline, discriminate against or retaliate against any employee who reports such conduct in good faith. Any manager who receives a report of a violation of this MongoDB Code must immediately inform the Human Resources Department or the MongoDB Legal Team. You may report any violation of this MongoDB Code on a confidential or anonymous basis, by contacting MongoDB's Legal Team. If the Legal Team receives information regarding an alleged violation of this MongoDB Code, he or she shall, as appropriate, (a) evaluate such information, (b) if the alleged violation involves an executive officer or a director, inform the Chief Executive Officer and, if warranted, the Board of Directors of the alleged violation, (c) determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate such inquiry or investigation and (d) report the results of any such inquiry or investigation, together with a recommendation as to disposition of the matter, to the Chief Executive Officer for action, or if the alleged violation involves an executive officer or a director, report the results of any such inquiry or investigation to the Board of Directors or the Audit Committee. Employees, officers and directors are expected to cooperate fully with any inquiry or investigation by MongoDB regarding an alleged violation of this MongoDB Code. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including dismissal.

It shall be determined whether violations of this MongoDB Code have occurred and, if so, shall determine the disciplinary measures to be taken against any employee who has violated this MongoDB Code. In the event that the alleged violation involves an executive officer or a director, the Chief Executive Officer and the Audit Committee, respectively, shall determine whether a violation of this MongoDB Code has occurred and, if so, shall determine the disciplinary measures to be taken against such executive officer or director.

Failure to comply with the standards outlined in this MongoDB Code will result in disciplinary action including, but not limited to, reprimands, warnings, probation or suspension without pay, demotions, reductions in salary, dismissal and restitution. Certain violations of this MongoDB Code may require MongoDB to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution. Moreover, any manager who directs or approves of any conduct in violation of this

MongoDB Code, or who has knowledge of such conduct and does not immediately report it, also will be subject to disciplinary action, up to and including dismissal.

### **No Retaliation**

MongoDB will not retaliate against any individual for filing a good-faith concern regarding non-compliance with this policy. MongoDB will not retaliate against any individual participating in the investigation of any such complaint either. Finally, MongoDB will not permit any such retaliation by any manager or executive officer, or by any company with which we contract.

### **Dissemination and Amendment**

MongoDB reserves the right to amend, alter or terminate this MongoDB Code at any time for any reason. The most current version of this MongoDB Code can be found on MongoDB's wiki in the Human Resources sections.

This document is not an employment contract between MongoDB and any of its employees, officers or directors and does not alter MongoDB's at-will employment policy in jurisdictions where such policy applies.