

Chegg

Code of Business Conduct and Ethics



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People of Chegg,

Chegg is grounded in our company values. Whether we're dreaming big to support our student-first mission, debating ideas during a Hackathon, or innovating with AI, Chegg is committed to those values.

Intrinsically tied to those company values is our strong sense of ethics, responsibility, and maintaining the highest standards of business conduct in our relationships with our students, our stockholders, our suppliers, our partners, and each other.

This updated Code of Business Conduct and Ethics outlines the standards of behavior that we expect from every member of our team – we must all be familiar with this Code and follow both the spirit and the letter of the rules it sets out.

While we'll always compete hard to be the best, we won't cut legal or ethical corners to meet objectives, and our success should never come at the expense of fairness. Integrity is at our core.

It's vital that we hold ourselves, and each other, accountable to these principles. Don't hesitate to speak up if you see something that appears to conflict with this Code or our values.

If you have questions about how to handle a particular situation, you can reach out to ethics@chegg.com or use any of the speak up channels as outlined in this Code.

Thank you for your part in upholding our commitment to ethical business conduct at Chegg.

A handwritten signature in black ink, appearing to read "Dan Rosensweig". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dan Rosensweig

We are **STUDENT FIRST**

We are committed to helping students succeed.

We **DREAM BIG**

Our ambition is to transform education by improving outcomes.

We **DEBATE, DECIDE, DO**

We respectfully challenge each other and then unite behind what we do.

We are **TRANSPARENT**

We are authentic and align our actions to our words.

We Believe **INNOVATION IS A WAY OF LIFE**

We are curious learners and always seek better ways of doing things.

We are **ONE TEAM**, We are **CHEGG**

We thrive when everyone contributes their energy, passion, and commitment.





Commitment to Compliance

Chegg is committed to compliance with applicable laws, rules, and regulations, and this Code of Business Conduct and Ethics applies to Chegg and all its global subsidiaries. Employees, managers, executives, and board members bear a responsibility for promoting legal compliance throughout the organization, and speaking up if any unethical or unlawful conduct is observed.

Speaking Up

It's important that everyone at Chegg feels comfortable speaking up if you observe something that appears to conflict with this Code, or if you have questions about how to handle a particular situation. Chegg will not retaliate—and will not tolerate retaliation—against any individual for filing a good-faith complaint with the company, or for providing information in a related investigation. You can be confident that complaints will be taken seriously, and if action is needed to correct a confirmed violation, we will take it.

There are many ways you can speak up:

- Directly to your manager or leader
- Human Resources
- The Chegg Ethics Officer (via ethics@chegg.com)
- Chegg's compliance hotline by phone (toll-free numbers located [here](#)) or the [online reporting platform](#) managed by EthicsPoint
- Chair of the Audit Committee (for matters related to accounting, controls, or auditing)
- Chair of the Governance and Sustainability Committee (for matters related to violations of laws and all other issues).

For more information on how Chegg handles reports of suspected violations and the process for making a report, see our [Whistleblower & Complaint Policy](#).

Who is the Chegg Ethics Officer?

Chegg's General Counsel serves as the Ethics Officer and has ultimate oversight over our Code of Business Conduct and Ethics and associated legal compliance policies. The responsibilities of the Ethics Officer include:

- Recommending any subject matter specific policies that form a part of this Code;
- Overseeing adoption of any procedures or policies (including overseeing the preparation and issuance of guidelines on specific legal and regulatory issues and matters involving ethical business practices);
- Responding to employee inquiries regarding compliance concerns; and
- Investigating (with participation by members of management, outside counsel and others as appropriate) violations or suspected violations of our Code and related policies.

A photograph of a group of people in a workshop or industrial setting. In the center, a man with a long dark beard, glasses, and a grey baseball cap with an 'Oregon' logo is smiling. He is wearing a blue denim shirt over a white t-shirt with a red and black graphic. To his right, a man with a grey beard and a black polo shirt is also smiling. In the foreground, the back of a person with long dark hair tied in a bun, wearing a light-colored short-sleeved shirt, is visible. Other people are blurred in the background. The text 'Creating a Safe and Secure Work Environment' is overlaid on the left side of the image in a large, white, sans-serif font.

Creating a Safe and Secure Work Environment

Respecting Each Other

Anyone who has been a part of the Chegg team knows about the energy created when smart people are committed to working together to accomplish great things. We're committed to maintaining a culture that's positive and fun, and that starts by treating others with dignity and respect. Each of us has a responsibility to promote an environment that's positive, safe, and free from harassment or discrimination.

What is harassment?

Harassment is unwelcome behavior based on any legally-protected characteristic that a reasonable person would find to be demeaning, humiliating, or offensive. **Harassment is never tolerated at Chegg** and any reports of harassment or discrimination will be investigated.

Harassment may include:

- **Things that are said**, including verbal abuse, offensive comments, taunting, jokes, threats, epithets, derogatory comments about an individual's body or dress, or slurs;
- **Things that are written**, including derogatory or sexually suggestive posters, photographs, drawings, emails, texts, or gestures; and
- **Actions**, including assault, unwanted touching or other harmful physical contact.

Our anti-harassment policy applies to everyone involved in the operation of Chegg, including managers, vendors, customers, independent contractors, and any related individuals. **All employees are responsible for conducting themselves in a manner consistent with this policy and are encouraged to report any complaints to their manager or HR.** Managers and supervisors are required to report any behavior constituting harassment or suspected harassment, including employee complaints.

For more information on Chegg's anti-harassment policy, see our [Employee Handbook](#).



Culture, Belonging and Inclusion

Chegg promotes culture, belonging, and inclusion across all levels, reflecting the multi-cultural learner population that we serve. We maintain a strong commitment to diversity in our workplace by fostering an environment that respects, appreciates, seeks, and encourages diverse perspectives and experiences. Through these intentional connections, our programs foster actionable steps so that each employee, wherever they are located around the world, can be their best authentic selves in support of our student first mission.

It's important that everyone at Chegg share this commitment to respecting and valuing differences.

Employment decisions, from hiring to compensation to advancement, are made based on business needs, job requirements, and individual qualifications rather than on favoritism or bias. We expect all our staff to do their part in ensuring we maintain an equitable and welcoming culture.

Health and Safety

At Chegg, we are committed to providing a safe environment for all Chegg employees. Each of us has a responsibility to make sure we are acting in the best interest of our own and each other's health and safety.

Acts of violence, threats or intimidation will not be tolerated, and firearms or other weapons are banned from our offices and any other Chegg premises, including company parking areas and company vehicles.

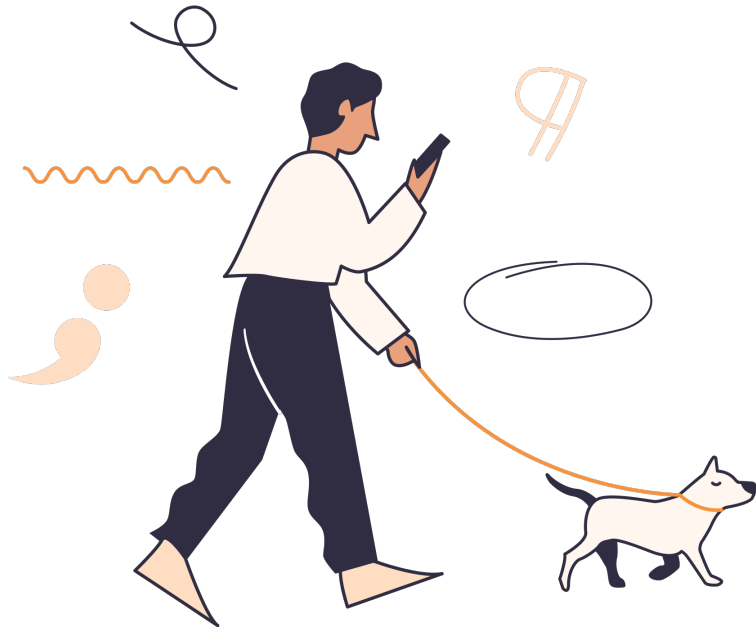
In addition, Chegg employees are prohibited from using, possessing or being under the influence of any illegal substance on our premises or while conducting Chegg business. While alcohol may be served at a company function or expensed in moderation at a business-related meal, it should never be the focus of any business-related event.

Unsafe conditions, workplace hazards, or injuries or accidents that happen at a Chegg office or while fulfilling your work for Chegg must be reported to your manager and HR immediately. If you see or experience any unsafe condition in any of our facilities or offices, report it to HR and workplace services or your manager immediately.



Acting Responsibly as an Employee





Protecting Confidential Information

As part of your role at Chegg, you may have access to Chegg's confidential information, including confidential, restricted, or secret Chegg data, or confidential information that belongs to our users or the brands, institutions, suppliers, and partners with whom we work, such as contact, academic, account and financial information. We are all responsible for safeguarding confidential information from theft or improper or accidental disclosure to the public, to competitors or even (for some information) to other employees.

Everyone must follow these guidelines to protect and preserve Chegg confidential information:

- **Become familiar with Chegg's [Data Classification Standard](#) and [Data Handling Process](#)** to understand the differences between public, confidential, restricted, and secret data and applicable handling requirements.
- **Don't disclose confidential information except as needed to perform your duties** and then only with an approved non-disclosure agreement or other provision approved by the Legal team.
- **Whether you work primarily in office, remotely, or hybrid, ensure all confidential information is appropriately stored and secured.** Lock your computer when you're not using it and secure all of your equipment.
- **Be mindful when having conversations, participating in video conferences, or hosting meetings in public areas** that you are not discussing or displaying confidential information where it can be seen or overheard.
- **Ensure confidential information is only sent via secure Chegg-approved methods.** If you need assistance with sending information securely, contact security@chegg.com.
- **Follow record retention rules** consistent with our [Record Retention and Destruction Policy](#). If you are unsure of the records retention rules, contact your manager.
- **New employees should not divulge the confidential information of their previous employers;** if you anticipate hiring someone who may have important confidential information from a prior employer and will be working for us in a related field, please contact the legal team via legal@chegg.com before extending an offer so that we can put appropriate safeguards in place.
- **Respect the confidentiality and trade secrets of others,** including business partners and even competitors. You may gather information about competitors and their products and services, but **you may not obtain their confidential information or trade secrets in an unethical or illegal fashion.**

Remember, your obligation to preserve Chegg's confidential information continues even after you leave the company.

Safeguarding Assets

Our assets, whether physical, technological, or intellectual, are critical to our business operations and success as a company – theft, carelessness and waste have a direct impact on our profitability. Personal use of company assets or resources such as computers, mobile devices, internet access, email, and other communications software should be kept to a minimum. Personal use must not interfere with your business obligations and must not introduce added risk to our company.

Similarly, when you use Chegg resources to access the internet or communicate, you are representing Chegg, and any improper use could reflect poorly on Chegg, damage its reputation, and subject you and Chegg to potential liability. **Remember, all computing and communications resources at Chegg are the property of Chegg and data from those resources may be inspected, monitored, collected, or disclosed in accordance with applicable law.**

We all have a responsibility to use and maintain company assets with care, and to guard against abuse. If you suspect theft in the workplace, whether electronic or physical, or if you become aware of the abuse of company assets or resources, report it immediately to your manager, HR, or the compliance hotline.





Privacy and Security

The rules governing data use are complex, evolving and differ among the countries in which Chegg operates, and we are committed to responsible privacy practices and complying with all applicable privacy and data security laws. This commitment means we take our privacy obligations seriously **and consider the privacy of our employees, customers, and partners at every step in our business processes, including building or improving new products.**

Privacy and Security

Chegg has a dedicated Trust & Security team that oversees our obligation to protect our customers, employees, and shareholders by proactively managing cybersecurity and privacy risk. This team is responsible for our privacy and information security policies, standards, and processes to help ensure that we conduct day-to-day business activities with the right level of security and privacy diligence. **It is your responsibility to become familiar with any relevant policies that impact you**, including:

- [Information Privacy and Security Policy](#) – outlines a framework to ensure the protection of data and information within Chegg applications, systems, and networks.
- [Data Classification Standard](#) – helps us label data according to its sensitivity. We have four levels: Public, Confidential, Restricted, and Secret. It's important you understand what level(s) of data your team handles.
- [Data Handling Process](#) – outlines requirements for safely handling data, according to its classification. See [here](#) for instructions on how to safely share files with vendors.

- [Password Standard](#) – requires you to set unique passwords for all Chegg accounts and treat all passwords as secret information.
- [Device Security Standard](#) – outlines requirements for keeping Chegg laptops secure.

If you have any reason to believe that there has been any security breach involving Chegg's networks or data (for example, if you discover an unexpected or unknown username in the user list or access logs for a system you manage, or you receive an email claiming Chegg systems or any password you use to access company systems or data have been compromised), you must report this to helpdesk@chegg.com immediately. **In a security incident, minutes matter!**

If you're unsure about any situation, please reach out to security@chegg.com as soon as possible and they will help you sort through it.



Intellectual Property Rights

Intellectual property law protects valuable assets for Chegg across the world, including its trademarks, copyrights, trade secrets, patents, domain names, as well as other related IP rights. It is critical that we handle our intellectual property appropriately and securely, including by protecting our assets from unauthorized or improper disclosure or use, which can significantly reduce their value, ultimately causing harm to our business. **Any external use of our IP assets, including trademark or copyrights, even by Chegg employees, must first be cleared by the legal team.** If you have doubts about whether or how IP assets can be shared externally, or if you suspect any of Chegg's IP rights are being violated or abused contact legal@chegg.com.

Similarly, it is also important that we ensure we are respecting the intellectual property rights of others, including dealing with others' intellectual property legally and fairly. **We must never use, copy or distribute third party intellectual property without permission or securing the appropriate rights.** This may include the rights to use certain music, photography, a person's name or likeness, logos, software, videos, or designs. We also strictly comply with the license requirements under which open source software is distributed.

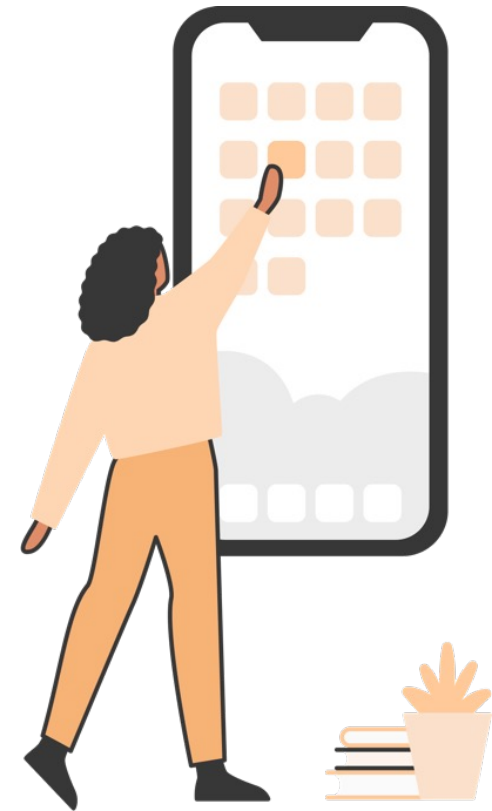
If you are unsure whether Chegg has the appropriate rights to use certain intellectual property, or **if you are considering incorporating open source code into any Chegg product, service or internal project, please contact the legal team via legal@chegg.com before moving forward.**

Social Media

Social media creates opportunities to champion Chegg, but it also creates risks and responsibilities, for you personally and for Chegg. Assume that anything you do on social media – whether on a business or personal account – could be viewed by a colleague, supervisor, partner, competitor, investor, potential employee, customer, or a student.

Given that, good judgment and discretion are essential when interacting on social media, and you should always consider the reputational impact of your posting activity. **Remember that, even if it's not your intention, people may see your comments and interpret them as Chegg's views**, especially on professional network platforms, like LinkedIn, that display company associations by default. It's also critical that you are careful not to disclose any Chegg confidential information on social media as doing so can severely impact Chegg's reputation and is also grounds for termination.

Get familiar with Chegg's [Social Media Policy](#) before going online and representing yourself as a Chegg employee or engaging in a dialogue about Chegg. **If you see something on social media that you think could impact Chegg's reputation, or that Chegg should be aware of, please contact the communications team at commsteam@chegg.com.**





Public Communications

We must communicate accurately and consistently with the public – it's important to our brand and is necessary to meet our legal obligations. **If you're approached by a journalist or someone who has a blog/website, or asked to participate in any public speaking engagement, make sure you get approval from the communications team first via our [External Communications Request](#) process and get familiar with our [Corporate Communications Policy](#).**

In addition, it's also important that you don't give an endorsement on behalf of Chegg, whether online or via other external means, except when approved in advance by the communications team and the legal team. Similarly, if you're giving a personal endorsement unrelated to your work at Chegg, ensure you don't use your affiliation with Chegg in any way.



Conducting Business with Integrity

Conflicts of Interest

A conflict of interest can occur when you are in a position at Chegg to influence a decision that could result in personal gain for you, your friends, or your family, at the expense of Chegg, our investors, or our community of users. **Even the appearance that your decision might be influenced by personal gain damages the integrity of the decision and may negatively impact Chegg.** Conflicts can take many forms:

Financial Interests

These types of conflicts can arise if anyone has investments in organizations or entities that Chegg conducts business with, including business partners, suppliers, and/or competitors. **Any type of relationship or financial interest that may fall in this category must be disclosed.** In some cases, you may need to abstain from decisions related to these affiliations. Additionally, it's never okay to accept stocks, discounted stocks, or stock options offered due to your work at or relationships developed through Chegg.

Outside Employment and Board Memberships

While at Chegg, you may be presented with outside employment, consulting, board, or other work opportunities. **Any outside work that creates a real or perceived conflict of interest must be avoided.**

Generally, you may not accept any outside employment if the work:

- interferes with company time,
- is related to the company's business,
- involves any personal business relationship with a competitor, supplier or vendor, or business partner where you have any influence over Chegg's relationship with that company;
- competes directly or indirectly with any current or planned Chegg effort; or
- otherwise creates a real or perceived conflict of interest.

Prior to accepting any board or advisory roles, you must inform ethics@chegg.com to obtain approval from the legal team.

Corporate Opportunities

A corporate opportunity is a potential business transaction that is discovered using Chegg's resources, technology, information, or because of any position with Chegg. **Employees may not compete with Chegg or take personal advantage of corporate opportunities that Chegg might want to pursue.**

Even opportunities acquired through independent sources may be questionable if they are related to Chegg's existing or proposed lines of business. Please consult the Chegg Ethics Officer to determine an appropriate course of action if interested in pursuing an opportunity discovered through or in connection with your position at Chegg, or use of Chegg property or information.

Friends and Family as Co-Workers

Usually, Chegg will not refuse to hire someone simply because they are related to a current employee, and we encourage referrals of qualified relatives for open positions. However, there are situations where employing relatives could create actual or perceived conflicts of interest, such as when one relative supervises or influences the other's employment status, compensation, duties, or performance evaluation. Given that, **you should not participate in hiring or other employment decisions related to relatives.** Similarly, close friendships with colleagues, business partners, or vendors

should not compromise your commitment to Chegg, and if you are concerned about a relationship that may affect your job duties, seek guidance from ethics@chegg.com.

Gifts and Business Courtesies

The exchange of gifts or business courtesies with those we do business with (or with those who seek to establish a business relationship) can easily create the appearance of a conflict, especially if the value of the gift is significant or excessive. Accepting and giving gifts depends on the circumstances and the parties involved, and regardless of its value, **a gift should never be accepted if it compromises your judgment** such that you might be influenced by the gift or create an appearance of being influenced.

Remember, if in doubt, disclose any potential conflict to your manager and/or the Chegg Ethics Officer. It's critical that you are open about the issue, which can often be resolved by being transparent and removing yourself from the situation. For additional information and guidance related to conflicts of interest, see Chegg's Conflict of Interest Policy in our Employee Handbook.

Gifts and Business Courtesies

Gifts and other business courtesies can help us build strong relationships with our business partners and should only be a token gesture of appreciation as a small part of building a business relationship. Accepting gifts depends on the circumstances and the parties involved, and regardless of its value, **a gift should never be given or accepted if it creates a sense of obligation to the other party** or compromises your judgment.

Gifts and other business courtesies, whether **given** or **received**, must:

- always be **reasonable and customary** in terms of both value and frequency, considering the local culture and norms of the country in which you're operating;
- always be **exchanged openly**, not secretly;
- always be in good taste and **business appropriate**;
- always **comply with all applicable local laws** and regulations;
- **never be in cash** or cash equivalents (gift cards, pre-paid debit cards, securities, etc.);
- **never be solicited**; and
- **never create or appear to create a conflict of interest**, an expectation of an exchange of benefits, an improper influence, or otherwise cause harm to Chegg's reputation.

Gifts and Business Courtesies

Accepting significant gifts such as those that involve airfare or lodging, or tickets to events such as the Olympics, Super Bowl or World Cup, are presumptively improper and **may only be accepted if disclosed to and approved by your manager and the Ethics Officer**, and where attendance at the event serves a legitimate Chegg business interest or where the company (rather than the employee) receives the ultimate benefit.

The same rules apply when giving business courtesies. **Substantial gifts to others must be approved by your manager and the Chegg Ethics Officer before being given.**

Gifts to and from government officials are often subject to even stricter and more specific rules. All business courtesies involving these persons must be approved **in advance** by the Chegg Ethics Officer. Review our [Anti-Corruption Policy](#) for more information.

If you are unsure whether accepting or giving a gift is appropriate, or whether a gift is considered significant, reach out to ethics@chegg.com.

What is considered a gift?

A gift is anything of value and can take many forms, including:

- Clothing, jewelry, art, or other goods
- Product or service discounts
- Services, loans, favors, privileges, access, or advantages and rights not available to the public
- Vacations, including the use of a residence or other accommodations
- Tickets to entertainment or sporting events
- Promise of a job or business opportunity

Fair Dealing and Competition

Many countries have antitrust and fair competition laws meant to facilitate open and honest competition among companies and prevent improper agreements or otherwise reduce trust in markets and inhibit innovation. Agreeing not to compete, dividing up markets, setting prices, coordinating a boycott of certain suppliers, customers or competitors, or acting to harm our competitors or customers are examples of behavior that could violate antitrust laws, resulting in significant criminal and/or civil penalties. **Chegg will not tolerate or participate in unlawful anti-competitive arrangements or activities.**

The application of competition laws can be complex, so please keep the following guidelines in mind:

- **Never share or discuss pricing, business plans or strategies, or customer information with competitors.**

- **Do not enter into agreements with competitors that set prices** or other business terms, divide customers or markets, or exclude legitimate businesses from participating in the market.
- **Be mindful at industry meetings** and other gatherings with competitors to avoid participating in conversations or other activities that may involve potential anti-competitive practices, or even the appearance of anti-competitive or collusive behavior.

When entering into seller-buyer arrangements, always deal fairly and be aware of any overly restrictive terms.

You are always expected to deal fairly and honestly with our customers, suppliers, employees and anyone else with whom you have contact while performing your duties. **Making false or misleading statements about our competitors is prohibited by this Code, is inconsistent with our reputation for integrity, and is harmful to our business.** Sensitive arrangements that may implicate antitrust areas must be reviewed by Legal in advance via legal@chegg.com.

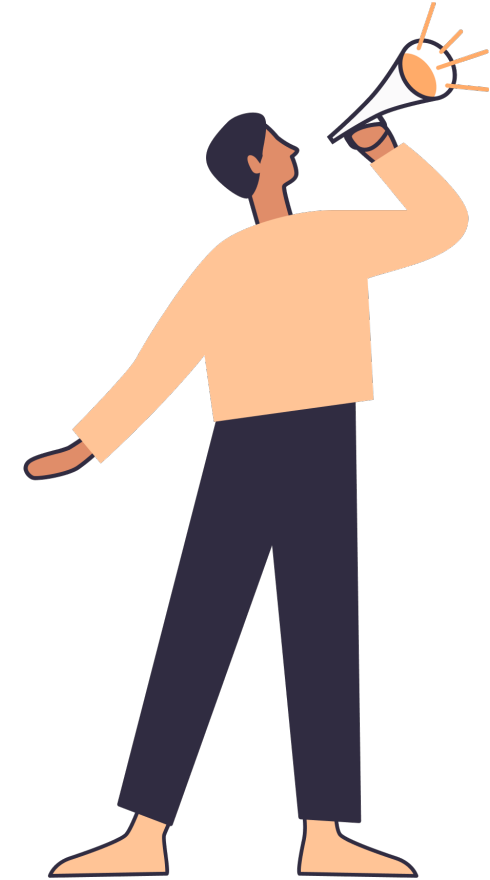
Insider Trading

Chegg has an open culture and believes in being open and transparent with its team. This openness carries with it certain responsibility – much of our information is confidential and cannot be shared outside the company, or even within the company, including with certain workers, such as contractors. Using this information, or other material non-public information regarding our business, suppliers and business partners, to buy or sell stock, or passing it to others so that they can trade stock, violates not only this Code, but is **unethical and illegal**.

Examples of material non-public information (meaning confidential information that has not yet been shared broadly outside of Chegg) may include, but is not limited to:

- historical or forecasted revenues, earnings or other financial results;
- significant new products or services, or other product developments;
- significant new contracts or partners, or the loss of a significant contract or partner;
- significant developments regarding Chegg's technology or business operations;
- possible mergers or acquisitions;
- significant changes in financial condition;
- changes in our Board or senior management;
- significant changes in corporate strategy;

It is your responsibility to familiarize yourself with Chegg's [Insider Trading Policy](#), which lays out the procedures that everyone at Chegg must follow to avoid even the appearance of such activity. **If you have any questions, please contact stockadmin@chegg.com.**





Trade Sanctions and Anti-Boycott Laws

Sanctions and export control laws prohibit organizations from doing business with and engaging in transactions involving certain places (including embargoed countries and jurisdictions), certain individuals, and certain goods and services. The U.S. and the European Union maintain and regularly update lists of countries, entities, and individuals subject to sanctions. **Chegg does not engage in or condone any business relationship that is prohibited by law.** For more information on where and what type of business is prohibited under these laws, see our Trade Sanctions Policy.

U.S. anti-boycott laws prohibit U.S. businesses from cooperating with foreign boycotts that aren't approved or supported

by the U.S. government and require that requests to participate in a boycott be reported to the government. The U.S. Commerce Department and the Internal Revenue Service administer rules governing compliance with non-approved international boycotts. **U.S. companies and their controlled foreign subsidiaries or branches are not permitted to comply with requests for information that support unauthorized boycotts.**

If, in the course of your work duties, you receive a boycott-related request from a business partner, promptly report it to legal@chegg.com.

For more information, please see our [Trade Sanctions Compliance Policy](#).

Bribery and Corruption

It's important that we conduct all business with honesty and integrity, and earn business based on the merit of our products and services. **No one working for Chegg should offer, give, solicit, or accept, directly or indirectly through a third party, bribes or kickbacks, make facilitating payments to a government official or engage in any other corrupt activities.** Remember that bribes include anything of value, not just cash.

Engaging in any type of corrupt activity could subject Chegg (and you!) to civil or criminal penalties under anti-bribery and corruption laws and regulations, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. **Suspected demands for a bribe, or the actual payment of a bribe must be promptly reported to the Ethics Officer via ethics@chegg.com, or through the compliance hotline.**

If you need more information about identifying bribery and corruption, see our [Anti-Corruption Policy](#). Remember that you must consult with the Ethics Officer before offering anything of value to a government official.

What is a bribe?

A bribe is any payment of, or an offer to pay, anything of value to a government official or to any person or entity that's given to benefit an individual to improperly influence business actions or decisions, or to otherwise acquire an improper advantage.

What is "anything of value"?

Anything of value could be cash, cash equivalents such as gift cards that may be redeemed for products or cash, vouchers, gifts, hospitality, meals, merchandise, event tickets, entertainment, travel perks, airfare or accommodations, favors such as educational, employment or internship opportunities for friends and relatives, charitable donations, discounts, or personal services.

What is a kickback?

A kickback is the return of a sum of money already paid or due to be paid as a reward for making or fostering business arrangements.

What is a facilitating payment?

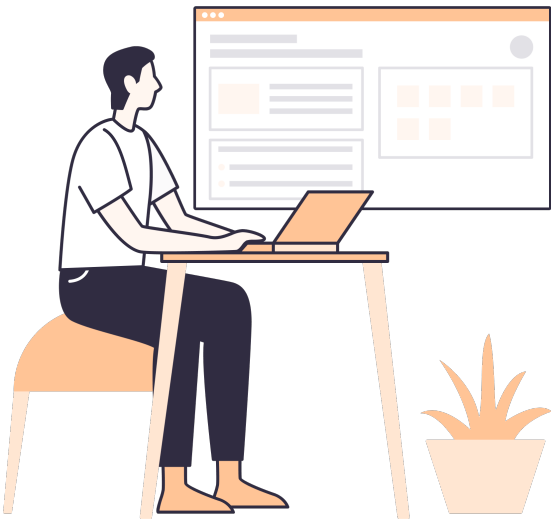
A facilitating payment is a payment made to a government official to expedite non-discretionary actions or services, such as providing police protection or approving permits.

Financial Integrity

A critical aspect of Chegg's ethical business culture is safeguarding the company's financial position, and we expect everyone to be honest and transparent in their financial dealings. This includes complying with internal controls, maintaining accurate and appropriately transparent records, ensuring approval processes are followed, and being fiscally responsible. **Everyone in the company, including our senior financial officers, has a responsibility to be accurate, complete, and honest** in what we report and record in company documents, including accounting records, expense reports, invoices, payroll records, business records, and evaluations.

Anyone who contributes to preparing Chegg financial information (including any related documents submitted to the Securities and Exchange Commission and in other public communications), is responsible for ensuring that **all disclosures are full, fair, accurate, timely and understandable**. Those individuals are also prohibited from misrepresenting facts, which include:

- making, or permitting or directing another to make, materially false or misleading entries in financial statements or records;
- failing to correct materially false and misleading financial statements or records;
- signing, or permitting another to sign, a document containing materially false and misleading information; and
- falsely responding, or failing to respond, to specific inquiries of the company's external accountant.



Financial Integrity

Conducting ourselves with financial integrity also means we remain conscious of and report any suspicious circumstances, which may include:

- **uncommon financial arrangements like cash payments** or payments directed to third parties that are not a part of the business arrangement;
- statements or communications related to our financial results that are **inaccurate or don't make business sense**;
- unusual payments that aren't consistent with regular business practice, including payments **without accompanying documentation**;
- financial reports or results that are **intentionally vague or misleading**;
- requests to document transactions that are **outside of normal process** or intended to conceal details;
- a **sudden change in payment or banking details** for an established supplier; and

- any activity that could be construed as **money laundering** or otherwise facilitating criminal activity.

It's up to each of us to remain vigilant and immediately report any suspicious financial activity using the speak up procedures detailed in this Code.

What is money laundering?

Money laundering is a financial crime that our company takes very seriously, which involves the attempt to hide the proceeds of criminal activity by moving funds through a series of otherwise legitimate transactions. For example, commercial processing funds generated through criminal activity (drug trafficking, terrorism, fraud, etc.) to hide the source of the funds or evade taxes. **Chegg will not tolerate the misuse of our systems to launder illicit monies.**

Engaging Responsibly with Our Community



Upholding Academic Integrity

Chegg is committed to students and their learning outcomes. We believe academic integrity is a fundamental part of the learning process, and we work hard to preserve it. **Our services are designed to support learning, not replace it, and they are expressly not intended to be used for cheating or fraud – like asking for answers to an active test or exam, or copying answers found online and submitting them as one's own.** These actions defeat the purpose of learning and are not fair to anyone.

We don't tolerate abuse of our platform or services. Misuse of our services can have serious consequences, including, without limitation, being banned from our platform. Our [Honor Code policy](#) supports this Code and our commitment to academic integrity.



Responsible Use of AI

Developments in artificial intelligence come with many exciting opportunities to create new offerings and improve our products. It's important that we lean into artificial intelligence as a critical tool for positively impacting learning outcomes for students; however, it's equally important we recognize our responsibility to ensure we are grounded in ethical principles.

While our understanding of artificial intelligence will evolve over time, we can ensure we are integrating and using artificial intelligence in a responsible and ethical manner by keeping these principles in mind:

- Artificial intelligence should never be used in a way that harms any individual, group, or society at large.
- We should be appropriately transparent about our use of artificial intelligence within our products and in our work.
- All systems leveraging artificial intelligence should be secure and prioritize the protection of personal information, and we should always uphold the integrity of systems by encouraging appropriate use.
- Artificial intelligence should be used in a fair and unbiased way, and never in a way that would allow for discrimination against particular groups of people.

For more information on using artificial intelligence tools in your work at Chegg, see our [Artificial Intelligence Usage Policy](#).

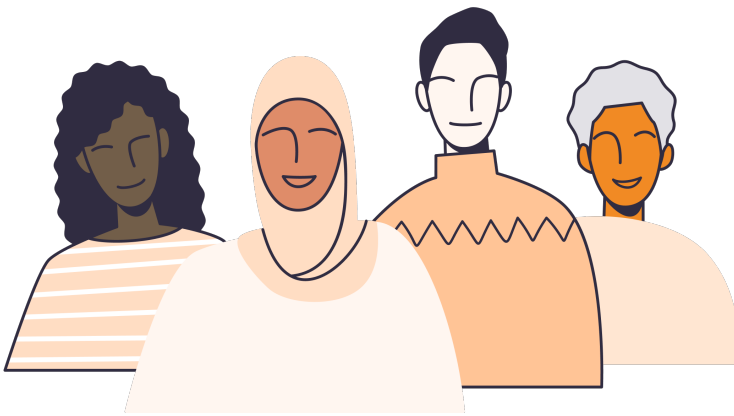


Sustainability and the Environment

Chegg's mission is to help learners, which includes minimizing our environmental impact on their communities. We know that we owe it to our customers, employees, and society to use environmentally sound practices. That's why **we comply with all environmental, safety, and health laws and regulations**, and work to ensure we are responsible consumers of energy and resources. We are all expected to do our part to help reduce Chegg's environmental footprint, and we should reduce waste, conserve resources, and recycle or reuse materials whenever possible. We strive to work with business partners who share these values.

For more information on Chegg's commitment to sustainability, see our [Environmental Policy](#) or check out the latest on our [ESG reference page](#).





Human Rights

Chegg is committed to protecting and advancing human rights related to our global operations. **We have zero tolerance for the use of child and forced labor, slavery, and human trafficking**, and we strive to maintain an environment that respects our workers and safeguards their rights in accordance with local and international laws. We require any of our third parties, including suppliers, to uphold this commitment, and we expect our employees and others working with us to immediately report any suspected human rights abuse.

For more information on how Chegg supports the fundamental protection of human rights, see our [Human Rights Policy](#).

Political Activity and Contributions

Chegg engages thoughtfully and constructively with governments and public institutions to further our mission to help students. As part of that engagement, Chegg complies with all applicable laws and regulations, and conducts all political activity ethically and transparently.

It is also important that we as individuals engage in the civic process responsibly. When conducting your own personal political activities, please keep the following principles in mind:

- You should not use company assets, time, or resources (including equipment, network, supplies and other materials) for personal political activities.

- Any personal political statements should be clear that you are not speaking on behalf of Chegg and that your statements are not in any way endorsed by Chegg.
- Don't make personal political contributions on behalf of Chegg or make payments of corporate funds to any political campaign, unless previously approved, in writing, by the Ethics Officer.
- Do not use your position at Chegg to pressure others to make political contributions or support a particular candidate.

Also keep in mind some jurisdictions require registration as a lobbyist when communicating with legislators to influence legislation or communicating with government officials to influence government action. **Unless your job at Chegg specifically involves working with government officials, work with the legal team before engaging in these activities.**

Additional Information



Training

To ensure that all employees are familiar with this Code of Ethics and the areas of the law that apply to and impact Chegg's operations, Chegg will make available appropriate educational and training programs and resources. These training programs are intended to provide an appropriate level of information and instruction regarding ethical business practices and relevant policies and procedures. The determination of the level of education needed by particular employees will be made by the Ethics Officer, in consultation with the relevant stakeholders with operational or administrative responsibility for the specific subject areas.

Waivers and Amendments

Any waiver or amendment of this Code that applies to any of Chegg's directors or executive officers must be in writing, must be authorized only by the Board of Directors and must be promptly disclosed to stockholders, along with the reasons for the waiver. Any such amendment or waiver will be disclosed as required by applicable laws, rules and regulations.

No Rights Created

This Code is a statement of fundamental principles, policies and procedures that govern Chegg's directors and employees in the conduct of Chegg business. It is not intended to and does not create any legal rights for any customer, supplier, competitor, stockholder or any other non-employee or entity.

A person wearing a striped shirt is sitting at a wooden desk, writing on a yellow notepad with a red pen. A silver laptop is open to the left. The desk is cluttered with various papers, including one with a QR code and another with a table. A black stapler is in the foreground. The background is slightly blurred, showing a chair and more papers.

Chegg

Questions?
ethics@chegg.com