JFROG LTD.

GLOBAL ANTI-CORRUPTION POLICY

JFROG LTD. together with its subsidiaries (the "**Company**") is dedicated to fostering and maintaining the highest ethical standards in each jurisdiction in which it conducts business. Bribery and corruption, which are antithetical to the Company's commitment to operating with the utmost integrity and transparency, are illegal in every country in which the Company operates. Such laws include, but are not limited to, the United States Foreign Corrupt Practices Act of 1977 (the "**FCPA**"), the United Kingdom Bribery Act of 2010 (the "**UK Bribery Act**"), the United States Travel Act, the OECD Anti-Bribery Convention, Title 18 United States Code Section 201, and many others (collectively referred to as the "**Anti-Corruption Laws**"). It is the Company's policy to comply fully with both the letter and spirit of all applicable Anti-Corruption Laws.

Purpose

The purpose of this Global Anti-Corruption Policy (this "**Policy**") is to describe the practices and procedures that the Company's officers, directors, and employees ("**Team Members**"), as well as its distributors, consultants, agents, contractors, business partners, and any other third-party representatives acting on the Company's behalf ("**Third-Party Representatives**") must follow to ensure that the Company's practices meet or exceed all applicable legal and ethical standards so that the Company can most effectively serve its customers. We require all Team Members and Third-Party Representatives to read, understand, and follow this Policy in the course of performing services on behalf of the Company.

Applicability and Implementation

This Policy is implemented and overseen by the Company's Chief Legal Officer, and applies to the Company, all Team Members, and Third-Party Representatives. If Team Members or Third-Party Representatives have questions about this Policy or the Anti-Corruption Laws, they should contact the Chief Legal Officer for advice and guidance.

This Policy must be followed **regardless of whether a Team Member or Third-Party Representative uses personal resources to pay for an expense or requests reimbursement from Company resources.**

No Bribery or Corruption

All Team Members and Third-Party Representatives are strictly prohibited from promising, offering, providing, authorizing, requesting, agreeing to receive, or accepting cash payments (including bribes or kickbacks) or anything else of value (including gifts, entertainment, favors, offers of employment), directly or indirectly, to any person in order to achieve an improper purpose related to the Company's business anywhere in the world.

Anti-Corruption Laws vary in scope as to whether they prohibit only bribery/corruption involving public officials or whether they also prohibit bribery/corruption involving private individuals which is also known as "commercial bribery" (e.g., payment or receipt of a kickback to a vendor). **The Company has a zero-tolerance policy and therefore strictly prohibits all forms of bribery and corruption regardless of whether they involve a public official or a private person, including private-sector business partners, customers, vendors, or competitors.**

Under the Anti-Corruption Laws, a bribe is any offer, promise, authorization, or payment of anything of value to an individual to improperly influence that individual in any way, such as to misuse their official position, obtain or retain business, direct business to another person, secure any improper advantage, or to violate an expectation that the individual will act in good faith, impartially, or in accordance with a position of trust.

Bribes can be anything of value, including:

- Cash;
- Meals;
- Entertainment;
- Gift cards with cash value;
- Travel;
- Tickets to events;
- Jewelry;
- Personal transportation vehicles;
- Charitable donations to a preferred charity;
- Tuition payments; and
- An offer of employment to a government official or someone else.

Specific Anti-Corruption Laws

Under the FCPA, nothing of value may be offered, promised, authorized, or made to any "Foreign Official" for the purpose of influencing a government act or otherwise obtaining or retaining business, directing business to any person, or securing any improper advantage.

The term "**Foreign Official**" is interpreted broadly and includes, but is not limited to:

- any employee, director, or officer of a foreign government or any department, agency, or instrumentality of a foreign government;
- any employee, director or officer of a foreign state-owned or controlled entity, including, in many countries, sovereign wealth funds, telecommunications companies, health care institutions, oil and gas companies, and educational institutions;
- any employee, director or officer of a public international organization, such as the Red Cross or World Bank;
- any consultant or other person acting in an official capacity for or on behalf of such foreign governmental bodies or public organizations, including entities hired to review and accept bids for a government agency; and

- foreign political parties, candidates for political office, and members of royal families. Employees should contact the Chief Legal Officer with questions regarding who may qualify as a Foreign Official.

Likewise, under U.S. laws prohibiting domestic bribery, nothing of value may be offered, authorized, promised, or made to any U.S. "public official" in exchange for influencing an official government act (*i.e.*, no *quid pro quo*). "**Public Officials**" include U.S. federal officials that hold a position of public trust with federal official responsibilities but also may include state and local government officials. In addition, every U.S. state prohibits bribery of public officials. Any gifts, meals, entertainment, hospitality, or travel provided to a Foreign or Public Official require pre-approval from the Chief Legal Officer, except for Company-logoed merchandise of nominal value.

Lastly, the U.S. Travel Act, the U.K. Bribery Act, and other laws also prohibit offering, giving, or promising a bribe to any individual, whether or not a Foreign or Public Official, for an improper purpose or to influence the performance of a relevant function or activity, including any activity connected with a business, trade or profession, or any activity associated with their employment. Such "commercial bribery" has increasingly been a focus of enforcement in many countries, including the U.S. and U.K. Actions that may violate the FCPA, U.S. Travel Act, or Bribery Act may also violate other laws in the countries where the Company does business, including state, local, and municipal laws, as well as conspiracy, mail and wire fraud laws.

Bribery of anybody, whether or not a Foreign or Public Official, is therefore illegal and strictly prohibited by this Policy. There are no exceptions to this Policy, even if you believe our competitors or other entities engage in improper behavior or if corruption is an accepted practice in a country in which we operate.

Facilitation Payments

This Policy prohibits "facilitation payments." Facilitation payments are payments, usually of small amounts, made to an individual to speed up routine, non-discretionary government activity that the official is required to perform, such as granting permits, licenses, or other documents that allow companies to conduct business in a country.

All employees are required to report any demands for Facilitation Payments, regardless of whether the demand is made to the Company, an employee of the Company, or a third party acting on behalf of the Company. Requests for facilitation payments must be reported to the Chief Legal Officer promptly after receiving or learning of the demand.

Gifts, Entertainment, and Sponsored Travel

Gifts and entertainment of nominal value may be given or received, but cash or cash equivalents and items of excessive value may not. Gifts to or from private sector business partners must be modest in value and within the thresholds set by the Company's internal procedures. Any gifts to private sector business partners above such threshold require pre-approval from the Chief Legal Officer. In addition, gifts may not be given or received when a decision related to the Company's business is pending, without pre-approval from the Chief Legal Officer. No gifts, meals, or entertainment may be provided to any customer, government or not, that you know violate that customer's policies on what it may accept. Meals, hospitality, and travel that are reasonable and consistent with applicable Company policies may be received from or provided to employees of private companies; however, any travel involving a Foreign or Public Official requires pre-approval from the Chief Legal Officer. Travel must be directly related to a

legitimate business purpose, and the Company may not pay for "side trips" or give customers money for travel.

Due Diligence - Third-Party Representatives

The Company may be liable if it authorizes a Third-Party Representative, such as a consultant, agent, contractor, reseller, joint venture partner or any other intermediary, to make an improper payment on its behalf. In addition, the Company can be held liable if it disregards or ignores signs (also known as "red flags") that should have alerted the Company that a Third-Party Representative intended to make an improper payment on its behalf. **As such, it is critical that the Company conduct risk-based due diligence screening on all Third-Party Representatives who may be reasonably expected to represent or act on behalf of the Company in non-U.S. jurisdictions prior to their engagement with the Company to ensure their commitment to compliance with the Anti-Corruption Laws.**

Risk-based due diligence is the investigation or vetting of a Third-Party Representative based on the particular risks that it presents. Before entering into, or renewing an agreement with, or compensating a Third-Party Representative, Team Members are required, among other things, to assess each Third-Party Representative's reputation for, and history of, legal compliance, particularly with respect to the Anti-Corruption Laws as well as the Third-Party Representative's qualifications and the reasonableness of the compensation to be provided to such Third-Party Representative. Team Members are required to consult with the Chief Legal Officer in advance of undertaking due diligence on any contemplated Third-Party Representative to ensure that the scope and nature of the process is consistent with the Company's expectations and applicable Anti-Corruption Laws. After due diligence is completed and any risks are mitigated, the Third-Party Representative's relationship with the Company must be memorialized by a written contract that includes appropriate representations and warranties requiring the Third-Party Representative to comply with the Anti-Corruption Laws. The Company should, where appropriate, obtain periodic certifications from the Third-Party Representative ensuring that it complied with the Anti-Corruption Laws.

Throughout any relationship with a Third-Party Representative, Team Members are responsible for monitoring their performance and must escalate to the Chief Legal Officer any concerns regarding their compliance with the Anti-Corruption Laws. Team Members should be particularly alert to any "red flags" that may be encountered during due diligence or throughout a relationship with Third-Party Representatives. "Red flags" can arise with any third party involved with the Company's business operations, but arise more frequently in dealings with joint venture partners and foreign agents (such as promoters, sales agents, distributors, resellers, or consultants). **The basic rule is simple: a "red flag" cannot be ignored, it must be addressed.**

"Red flags" can arise at any stage of a transaction – during due diligence, during contract negotiations, in the course of operations, or at renewal or termination. "Red flags" that do not present serious issues at one stage of a transaction or relationship may pose significant liability risks when they appear at a different stage or in combination with a different overall set of facts. Thus, the significance of "red flags" must be considered in context rather than in isolation. All "red flags" must immediately be investigated and appropriately addressed. If you become aware of facts that may be "red flags", you should immediately contact the Chief Legal Officer.

Due Diligence – Corporate Transactional Activity

The corruption risks posed by potential merger, acquisition, joint venture or other corporate transactional activity will vary depending on a variety of factors, including the nature of the transaction or relationship contemplated by the Company. The Company's Chief Legal Officer must be involved at the earliest stage possible of any such contemplated activities in order to devise an appropriate approach to anti-corruption due diligence as well as post-transaction integration and monitoring activities to assure compliance with the Anti-Corruption Laws.

Due Diligence – Employee Onboarding

Hiring decisions could pose corruption risks, particularly if the Company selects a candidate at the request of a Foreign or Public Official. As a result, the Company must conduct due diligence on potential new hires. As part of the Company's employee onboarding process, all potential new hires must:

- be vetted and approved through an anti-corruption due diligence process as prescribed by the Human Resources and Legal Departments which will, for example, require additional scrutiny of prospective employees who have immediate family members or close personal relationships with individuals who fall within the definitions of "Foreign Official," "Public Official" or are otherwise affiliated with any of the Company's significant commercial partners;
- certify that they will comply with the Anti-Corruption Laws and this policy; and
- disclose whether they, any member of their immediate families or close personal relationships, currently holds or previously held any positions which fall within the definition of "Foreign Official," "Public Official," or are otherwise affiliated with any of the Company's significant commercial partners.

Political Contributions

The Company reserves the right to communicate its position on important issues to elected representatives and other government officials. It is, however, always the Company's policy to comply fully with all local, state, federal, foreign, and other applicable laws, rules, or regulations regarding political contributions. Donations to political campaigns or causes can present a risk of violating Anti-Corruption Laws, especially if contributions are made to a campaign at the request or suggestion of a Foreign or Public Official.

To mitigate the risk of an improper payment or the appearance of an improper payment, no Company funds, facilities, or services of any kind may be paid or furnished to any Foreign or Public Official, including any candidate or prospective candidate for public office, to any political party, or to any political initiative, referendum, or other form of political campaign, unless explicitly permitted by applicable laws. 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.

Charitable Contributions

The Company is committed to improving and promoting the interests of the communities in which it conducts business operations. However, like political contributions, donations to charitable organizations can present a risk under the Anti-Corruption Laws, particularly if such donations are made at the request or suggestion of a Foreign or Public Official. As such, prior written approval of the Chief Legal Officer

must be obtained before any charitable donation is made on behalf of the Company or using Company funds, directly or indirectly.

Books and Records and Internal Controls

This Policy requires the Company to keep books and records which: (1) have reasonable detail; (2) accurately and fairly reflect transactions and the disposition of assets; and (3) are not false. In addition, this Policy requires that the Company keep a system of internal controls that provide reasonable assurances that transactions: (1) occur only as permitted by the Company's policies and procedures; and (2) are accurately recorded in the Company's books and records. As such, all Team Members (not just those working in finance) must ensure that the Company's books and records are accurate and must never create, submit, authorize, or otherwise permit false or fictitious documents to be incorporated into the Company's books and records. All Company funds must be properly accounted for and no side, off-the-books, or "slush funds" may be maintained by the Company or its Team Members. All Team Members are responsible for compliance with books and records and internal controls laws.

Additionally, under certain circumstances, the Company could be liable under the Anti-Corruption Laws if Team Members know of certain misconduct by Third-Party Representatives. For example, if Team Members know or believe that a Third-Party Representative, such as a distributor or re-seller, has over-billed clients to create slush funds or any sort of off-the-books accounts that are used for illicit purposes, the Company could be liable. In short, Team Members must notify the Chief Legal Officer if they become aware of any sort of slush funds or off-the-books accounts maintained by any Third-Party Representatives.

Penalties

Violations of the Anti-Corruption Laws can result in severe criminal and civil penalties for both the Company and the individuals involved, including imprisonment, forfeiture of profits, and significant fines. In addition, bribery is **always** a violation of the Company's policies and will result in disciplinary action, up to and including termination of employment or a Third-Party Representative's relationship with the Company.

Reporting Violations or Potential Violations of this Policy

If a Team Member or Third-Party Representative suspects or becomes aware of any action related to bribery, recordkeeping or internal controls that he or she believes may be illegal, unethical or inappropriate, or otherwise in violation of this Policy, the person must immediately report the situation to the Chief Legal Officer. Any manager or HR representative who receives a report of a potential violation of this Policy or the law must immediately inform the Chief Legal Officer.

Any Team Member or Third-Party Representative also may report their concerns via the Company's confidential independent secure web portal at jfrog.ethicspoint.com, available 24 hours per day, seven days per week.

If for any reason an individual is uncomfortable discussing the matter with the Chief Legal Officer or via the hotline, he or she may raise the matter directly with the Board of Directors.

The Company will not permit retaliation of any kind against anyone who makes a report or complaint in good faith with a reasonable basis for believing that a violation of this Policy or other illegal, unethical or inappropriate conduct has occurred. The Company encourages and highly values such good faith reporting of potential conduct that may violate Anti-Corruption Laws or related laws or regulations.

Nothing in this Policy prohibits or restricts any Team Member or other individual from reporting possible violations of law or regulation to, filing a charge or complaint with, communicating with, or participating in any investigation by any governmental agency or authority, or from making other disclosures protected under applicable whistleblower laws.

Whom Should I Contact if I Have Questions?

If you have any questions about this Policy, the Anti-Corruption Laws, or their applicability to the Company's business affairs or to any particular conduct, please contact the Chief Legal Officer, who can assist you in answering questions and obtaining the approvals required by this Policy. The Chief Legal Officer will work with you to ensure that the Company follows this Policy and follows the law.

Annual Review

The Chief Legal Officer, or a designee, will conduct an annual review to confirm the adequacy and effective implementation of this Anti-Corruption Policy. Reviews may be undertaken more frequently (within the discretion of the Chief Legal Officer) if the annual reviews reveal material issues of non-compliance or indications that this Policy has not been fully understood or implemented. To the extent any material irregularities are noted during such reviews, the Chief Legal Officer, or a designee, shall promptly take any actions deemed necessary or appropriate, including but not limited to, determining whether any regulatory notifications or disclosures or internal investigations may be required.

Version: October 21, 2026