

Liftoff Code of Ethics for Senior Financial Officers

1. Purpose

This Code of Ethics for Senior Financial Officers (this “Code”) is adopted pursuant to the requirements of Section 406 of the Sarbanes-Oxley Act and applicable SEC rules. The purpose of this Code is to promote honest and ethical conduct and compliance with applicable law, particularly as related to the maintenance of the Company’s financial books and records and the preparation of its financial statements. The obligations imposed by this Code supplement, but do not replace, the Company’s Code of Business Conduct and Ethics.

2. Scope

This Code applies to (a) the chief executive officer, the chief financial officer, the chief accounting officer of the Company, and individuals performing similar functions, and (b) other employees of the Company serving in a finance, accounting, corporate treasury, or tax role (collectively, the “Covered Persons”).

3. Definitions

For purposes of this Code, the following definitions apply:

Audit Committee: means the Audit Committee of the Board.

Board: means the Board of Directors of the Company.

Company: means Liftoff Mobile, Inc., including its subsidiaries and affiliates.

Covered Persons: has the meaning set forth in Section 2 of this Code.

SEC: means the U.S. Securities and Exchange Commission.

4. Standards of Conduct for Covered Persons

Pursuant to this Code, Covered Persons should:

- engage in and promote ethical conduct, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships, and disclose to the

Company's General Counsel (or their designee) any material transaction or relationship that reasonably could be expected to give rise to such a conflict;

- carry out their responsibilities honestly, in good faith and with integrity, due care and diligence, exercising at all times their best independent judgment;
- assist in the production of full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, the SEC and other regulators and in other public communications made by the Company;
- comply with applicable laws, rules, and regulations of federal, state, and local governments, the SEC, Nasdaq, and other applicable regulatory agencies;
- Promptly report (anonymously, if desired) to the Audit Committee any violation of this Code or any other matters that would compromise the integrity of the Company's financial statements;
- Never take, directly or indirectly, any action to coerce, manipulate, mislead, or fraudulently influence the Company's independent auditors in the performance of their audit or review of the Company's financial statements; and
- responsibly use, control, and oversee assets and other resources employed or entrusted to the Covered Person's supervision.

5. Compliance and Administration

Compliance with this Code is monitored and enforced by the Company.

The Legal Team, in coordination with the Finance, Internal Audit, and Human Resources Teams, as appropriate, oversees compliance through internal controls, reviews, audits, and investigations.

The Company will take all necessary actions to enforce this Code, up to and including termination of employment of a Covered Person violating this Code. Violations of this Code may also constitute violations of law, which may subject a Covered Person and the Company to criminal and civil penalties.

Any waiver of this Code for the Company's chief executive officer, the chief financial officer, the chief accounting officer, or individuals performing similar functions may be granted only by the Board or the Audit Committee and will be promptly disclosed as required by applicable law, regulations, or stock exchange listing standards.

Retaliation against individuals who report concerns or participate in investigations in good faith is strictly prohibited and will result in disciplinary action, up to and including termination of employment.

6. Review and Revision

This Code will be overseen and reviewed periodically by the Audit Committee. The Audit Committee will recommend any revisions it deems necessary or appropriate for approval by the Company's Board.

7. Contact Information

For questions or further information, please contact:

- The Legal Team at legal@liftoff.ai.