

# BuzzFeed Inc.

## STOCK OWNERSHIP GUIDELINES

The Compensation Committee (the “**Committee**”), in consultation with the Board of Directors (the “**Board**”) of BuzzFeed, Inc. (the “Company”), has determined that to further align the long-term interests of (a) the Company’s stockholders, (b) its executive officers within the meaning of Section 3b-7 of the Exchange Act of 1934, as amended (the “**Executive Officers**”) and (c) its non-employee directors (“**Non-Employee Directors**”). It is in the best interest of the Company to require its Executive Officers and Non-Employee Directors to maintain significant direct ownership in the Company’s common stock. As a result of such determination, the Committee has adopted this Stock Ownership Policy (this “**Ownership Policy**”) to provide for an appropriate level of equity ownership.

### EXECUTIVE STOCK OWNERSHIP POLICY

The Chief Executive Officer and each other Executive Officer is required to own shares of the Company’s common stock of whatever class (as determined in accordance with the section entitled “*Shares Included in Ownership Calculation*” below) with an aggregate value at least equal to:

- CEO – Five (5) times their annual base salary as of the Determination Date
- All other Executive Officers – Two (2) times their annual base salary as of the Determination Date

Each individual will be required to hold fifty percent (50%) of the Company’s common shares acquired through the Company’s compensation program, net of taxes, until the above guidelines are achieved.

### NON-EMPLOYEE DIRECTOR STOCK OWNERSHIP POLICY

Each Non-Employee Director is required to own shares of the Company’s common stock (as determined in accordance with the section entitled “*Shares Included in Ownership Calculation*” below) having an aggregate value at least equal to five (5) times their annual cash retainer as of the Determination Date. Non-Employee Directors are subject to this Ownership Policy for as long as they continue to serve on the Board.

Each individual will be required to hold one hundred percent (100%) of the Company’s common shares acquired through the Company’s compensation program, net of taxes, until the above guidelines are achieved.

### COMPLIANCE/TIMING

The applicable level of Company stock ownership is expected to be satisfied **within five years** after an individual first becomes subject to this Ownership Policy and maintained

thereafter for as long as the individual remains an Executive Officer or a Non-Employee Director.

### DETERMINATION DATE

Compliance with the Ownership Policy will be determined in January of each year. For purposes of determining compliance, the aggregate value of the shares required to be owned for each applicable year shall be determined as of December 31<sup>st</sup> of the prior year (or if such date is not a trading date, the immediately preceding trading date) (the “**Determination Date**”) based on the volume weighted average closing price of the Company’s common stock as reported on Nasdaq for the one (1) fiscal year ended immediately on such Determination Date.

### SHARES INCLUDED IN OWNERSHIP CALCULATION

Shares of common stock and restricted stock units (RSUs) subject to time-based vesting in the future, even if not then settled, will be considered in determining whether an individual’s stock ownership requirement has been met (as discussed more fully below):

- Shares or RSUs held directly by the individual or his or her immediate family members residing in the same household;
- Shares or RSUs held in a trust for the benefit of the individual or his or her immediate family members residing in the same household; and
- Shares or RSUs held by a partnership, limited liability company or other entity to the extent of the individual’s interest therein (or the interest therein of his or her immediate family members residing in the same household), but only if the individual has, or shares power to, vote any such shares or dispose of any such shares or RSUs.

### HARDSHIP EXCEPTIONS

There may be rare instances in which compliance with this Ownership Policy would place a severe hardship on an individual or would prevent an individual from complying with a court order, such as in the case of a divorce settlement. In these instances, the Committee will evaluate whether exceptions from this Ownership Policy should be made. If an exception is granted in whole or in part, the Committee will, in consultation with the individual, develop an alternative stock ownership plan that reflects both the intention of this Ownership Policy and the individual’s particular circumstances. Any such granted exception and alternative stock ownership plan shall be deemed to be consistent with this Ownership Policy and shall not be deemed a waiver.

### FAILURE TO MEET OWNERSHIP REQUIREMENT

Individuals whose ownership is below the required guideline level will be subject to the previously described share retention requirements until the guideline is achieved (i.e.,

50% for Executive Officers and 100% for Non-Employee directors). Those individuals that were previously in compliance with the guideline, but then fall out of compliance the following year, will again be subject to the share retention requirement until the guideline is again achieved. Failure to adhere to the share retention requirement may result in a reduction in future long term incentive grants.

**AMENDMENT:**

The Committee or the Board may amend this Ownership Policy at any time and from time to time in their sole discretion.

**Amended by the Board of Directors on February 8, 2024**