

Code of Conduct



• Introduction

Through our efforts and vision of offering premier Global Creation and Interaction Platforms, ByteDance ("the Company") is committed to making the digital life of billions of people become more beautiful, efficient, and interesting. ByteDance believes that high ethical standards and a culture of integrity play a pivotal role in achieving the vision.

Therefore, the Company has developed the *ByteDance Code of Conduct* and *ByteDance Partner Code of Conduct* (collectively, "the Codes"). We require all board members, managers, and employees of the Company (collectively "ByteDancers") to comply with the *ByteDance Code of Conduct*; and we require our suppliers, service providers, agents, vendors, consultants and other third parties acting on behalf of ByteDance (collectively "Partners") to comply with the *ByteDance Partner Code of Conduct* ("Business Partner Code"). In addition to compliance with the Codes, all ByteDancers and Partners must comply with all applicable laws and regulations. In case of any conflict between the Codes and any applicable laws and regulations, whichever stricter should apply.

The Codes are more than a global set of rules; it is the cornerstone of our business integrity and ethics; it is our commitment to the industry, markets, platform and users, ByteDancers, and Partners. ByteDance believes that when we engage with Partners who understand, recognize, and share ByteDance's values of integrity and ethics, we can create a robust, long-term foundation for trusted business relationship and contribute to the growth of the industry.

While the Business Partner Code covers many matters, it is not intended to be all-inclusive or to address every situation.

• Honest and Ethical Business Conduct

ByteDance has zero tolerance for unlawful or unethical conduct in any form, including but not limited to corruption, bribery, fraud, extortion, embezzlement, kickbacks or money laundering. We expect all ByteDancers and Partners to act with integrity in all their business dealings.

No kickbacks or corruption of any kind will be tolerated in any business dealings, including through third-party intermediaries. No ByteDancer or Partner shall directly or indirectly solicit, accept, or promise any form of improper benefits under any name. We require strict adherence to all applicable anti-corruption laws, including but not limited to the US Foreign Corrupt Practices Act, UK Bribery Act, and applicable international anti-corruption conventions.

ByteDancers and Partners must promote fair competition and respect our competitors in the market place; we must avoid business activities or conduct that would unlawfully restrict or prohibit competition under the applicable laws and regulations.

The Company requires all ByteDancers and Partners to disclose and declare the existence of an actual or potential conflict of interest in a timely manner, and cooperate with the Company to take effective measures to avoid or eliminate the possible impact of the conflict of interest in the existing or proposed business relationship.

• International Trade Compliance and AML

ByteDance is a global company and supplying products and services to customers around the world. Many countries, out of national security, foreign policy and other reasons, issue laws and regulations to regulate international transactions, such as imports and exports of goods and services, as well as cross-border

technology transfer. All ByteDancers and Partners must comply with the trade sanctions, export control and other trade-relevant laws and regulations that apply in the countries in which ByteDance and Partners do business.

To ensure compliance with international trade compliance laws, ByteDance prohibits business activities, or other dealings with sanctioned regions and parties that may lead to violation by ByteDance or Partner of any applicable sanctions and export control laws and regulations.

ByteDancers and Partners shall only conduct business with customers who are involved in legitimate business activity and whose funds are derived from legitimate sources, in order to combat money laundering and terrorist financing.

• **Information Security and Data Protection**

All information created, obtained, or stored by ByteDance is a valuable asset. We are responsible for not only the security of our own network and information but also the privacy and security of our global users' and all Partners' data. Likewise, Partners are expected to take responsibility to protect the privacy and security of our global users' and ByteDancers' data.

ByteDancers and Partners must maintain a high standard for the security of data in the countries in which we operate by complying with applicable data protection laws and regulations at all times.

All non-public information disclosed by ByteDance in the course of business must be treated by Partners as confidential, including but not limited to the Company's business information, intellectual property rights, product strategy, proprietary data, financial status, strategic plans, organizational structure, technical or management rules, negotiation information, user/ customer information, employee information, as well as third-party confidential information that ByteDance is under any statutory or contractual obligation not to disclose to the public. Partners must use confidential information only as authorized and only for ByteDance business.

We not only attach importance to the protection of confidential information of ourselves, but also attach equal importance to the protection of confidential information of our Partners. We respect the legitimate rights and interests of Partners and we are committed to fulfilling our obligation to protect all confidential information of our Partners in accordance with the confidentiality agreement or applicable laws and regulations.

• **Intellectual Property and Creator Protection**

Intellectual property is a core value to ByteDance. All ByteDancers and Partners must take appropriate measures to safeguard ByteDance's intellectual property, including without limited to trade secrets, know-how, patents, copyrights, trademarks and source codes.

Creators, as a key source of our commercial activities, are valuable assets to us. ByteDance users, cooperative organizations, partners are all our valued content creators, and all ByteDancers and Partners must be committed to respecting and protecting their intellectual property rights.

If you believe any potential or existing infringement of the intellectual property of ByteDance or any of its creator, you should immediately report to us so that we can take appropriate action timely.

• **Corporate Social Responsibility**

ByteDance actively integrates corporate social responsibility into our daily operations by actively participating in public welfare activities, and continuously improving our business practices to make a positive contribution in the communities in which we operate. We encourage all ByteDancers and Partners to actively participate in voluntary public service and other public welfare activities.

We emphasize the importance of platform governance and product safety. All ByteDancers and Partners must comply with the applicable laws and regulations on platform operation and product safety.

ByteDance considers it a key responsibility to conduct business in harmony with the environment. We support and encourage efficient use of natural resources and make efforts to act responsibly to reduce the impact of our activities on the environment. We expect all ByteDancers and Partners to commit to environment protection and natural resource preservation.

• **Diversity and Inclusion**

Born to be global, we span our operation across geographies and house a workforce with diverse backgrounds. We champion diversity and inclusion, as we understand only by sticking to this principle, are we able to attract and maintain a robust workforce, which is essential for achieving our mission of "*Inspire Creativity, Enrich Life*". Moreover, it is also our commitment to the whole society that we cherish and respect uniqueness, and we encourage people to be their true and creative selves.

As a reliable global business participant and employer, we hold us to a high standard in terms of building a respectful workplace. We expect all the ByteDancers and Partners to act and treat others with dignity and respect in settings associated with work, and we will continue committing to providing a work environment in which people feel safe, comfortable and respected. As part of that commitment, we will not tolerate any form of discrimination or any form of harassment (including but not limited to discrimination or harassment on the grounds of race, color, sex, political beliefs, religion, national or ethnic origin, sexual orientation, disability, union membership, or any other characteristics protected by applicable laws and regulations); any such act will be subject to proportional corrective actions.

• **Employee Health and Safety**

We commit to providing a safe and healthy work environment and strive for an operational health and safety promotion for continuous improvement of the work conditions.

ByteDancers and Partners must maintain a high standard for securing employee health and safety by complying with all applicable laws and regulations, including but not limited to those on working hours, wages, benefits, right to freedom of association, collective bargaining.

• **Anti-Modern Day Slavery and Human Trafficking**

The Company and our Partners must all be committed to ensuring that modern slavery or human trafficking is not taking place anywhere within our organization or supply chains. The Company prohibits child labor or other illegal employment, forced or compulsory labor, or employment discrimination.

Our primary supply chain includes the use of information technology, office services and engagement with providers of professional services. As part of our procurement processes, new suppliers are subject to due diligence using a combination of manual review processes and global supply chain technology assessment tools. All of our Partners are expected to combat modern slavery in their respective supply chain and such commitment is one of the key considerations for us to select our suppliers and other business partners.

We are a member of the **BSR**, a global non-profit organization that seeks to advance cross-industry progress to combat modern slavery in global supply chains. The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf and we thus expect our Partners to fully collaborate with us to fulfil such obligations.

- **Obligations of Partners**

Since our Partners are essential contributors to our success, we expect them to follow the same standards as we have set for ourselves. All Partners are required to sign an acknowledgment of the Business Partner Code to ensure their commitment to the values and standards upheld by ByteDance.

We take monitoring and auditing measures from time to time to verify whether our Partners are compliant with the Business Partner Code.

ByteDance, and its subsidiaries and affiliates, reserves the right to hold Partners liable for any financial or reputational damages caused by any violation of the Business Partner Code.

- **Speak Up and How to report?**

We are committed to building a healthy business environment and adopting a "zero tolerance" approach towards any improper act in any form, including but not limited to corruption, bribery, fraud, extortion, embezzlement, kickbacks or money laundering in our business activities.

If ByteDancers or Partners notice any suspected violations, we encourage all ByteDancers and Partners to speak up by utilizing our whistle-blowing channel:

Contact Global Ethics Office at: ethics@bytedance.com.

The Company strongly prohibits and disciplines any act of retaliation, and takes appropriate measures to protect those who report concerns. In particular, ByteDance is committed to providing you with the channel to make the report confidentially and anonymously, to the extent permissible under the applicable laws and regulations.

The voices of ByteDancers and Partners are very important to us and will help us strengthen our culture of integrity and compliance.