



Supplier Code of Conduct

“Act with Integrity” has guided our business choices since Pinterest was founded. We partner with suppliers who embody the same values and are committed to operating lawfully, ethically, and responsibly. This Supplier Code of Conduct sets out Pinterest’s expectations for our suppliers’ business conduct when working with Pinterest.

This Supplier Code of Conduct applies to the suppliers of Pinterest, Inc. and its subsidiaries and controlled affiliates (“Pinterest” or “we”) located anywhere in the world. A “supplier” (or “you”) is a third party that provides any kind of good or service to Pinterest in exchange for value. We expect each supplier to communicate the content of this Supplier Code of Conduct to your employees, agents, subcontractors, and other representatives working with or for Pinterest. If members of your staff will be working on our premises or directly with our Pinterest team members, we also ask that you share a copy of our [Code of Business Conduct & Business Ethics](#) with them. Failing to meet the expectations in this Supplier Code of Conduct may affect current and future work with Pinterest.

Operate honestly

Act ethically. Follow the law and be transparent.

- **Compliance with applicable law**

At Pinterest, we respect applicable law, including local laws and regulations that apply to our business. Our suppliers must comply with applicable law and our contractual terms. If adhering to this Supplier Code of Conduct would violate local law, we expect you to comply with law.

- **Conflicts of Interest**

We all work hard to drive Pinterest’s success. In the interest of transparency, promptly disclose to Pinterest any activity, transaction or relationship that may create an actual, potential, or perceived conflict of interest with Pinterest. Examples of situations that could present a conflict (even if none exists today) that you should tell Pinterest about include:

- A member of your staff doing work for Pinterest has a close personal relationship with a Pinterest staff member, and your work with Pinterest involves working with that Pinterest staff member.
- You are partly owned or controlled by the government.
- You are a public international organization.
- You are a political party.

- A member of your staff doing work for Pinterest is a government official -- in other words, your staff member works for or on behalf of any government at any level or for any branch of government.
- A member of your staff doing work for Pinterest is a political candidate.

Promptly send a disclosure to Sourcing@pinterest.com describing the situation. Pinterest's Business Conduct team will review your disclosure and let you know whether any action is needed. If you have any questions, reach out to Sourcing@pinterest.com.

- **Antitrust and competition**

We support vibrant competition within our own business and within the business of our partners and suppliers. We expect our suppliers to understand and respect antitrust and competition laws. Never make a deal on behalf of Pinterest with a Pinterest competitor on how we will compete, such as by allocating markets, fixing prices, promising not to hire certain candidates, agreeing not to pursue certain advertisers, verticals or audiences, or other concerted action.

- **Preventing bribery and corruption**

As a global company, we respect and adhere to anti-corruption laws around the world, including the US Foreign Corrupt Practices Act and the UK Bribery Act. We honor both the letter and spirit of these laws and our suppliers and other agents must do the same. Suppliers must not offer, give, or authorize the payment of anything of value on behalf of Pinterest to secure an improper advantage or otherwise improperly influence the decisions of others. You must not solicit or accept a bribe or kickback in any form. Pinterest also expects its suppliers to maintain accurate and complete books and records, and have in place any necessary policies or procedures to prevent violations of the applicable anti-bribery laws. It's important that your staff, subcontractors and agents understand these obligations.

- **Gifts and political participation**

To protect the integrity of Pinterest's internal business processes, support our business relationships, avoid conflicts of interest, and help us comply with anti-bribery laws, Pinterest has clear procedures for gift giving and receiving. If you want to give a gift to a Pinterest team member, please ask the recipient first to make sure it aligns with our policies. Note that members of Pinterest's Procurement team do not accept gifts of any value. Suppliers may not give a gift or donation on Pinterest's behalf to any third party without prior written approval from Procurement.

Pinterest is committed to undertake any lobbying activities in compliance with all applicable laws and to behave ethically in our interactions with governments, agencies, and their representatives. We expect our suppliers to ensure that their own lobbying activities also are performed with the same high ethical standards and in compliance with applicable law. Suppliers may not engage in lobbying or make political contributions on Pinterest's behalf without advance written authorization from Pinterest's Compliance and Public Policy teams to

do so. Any request to engage in lobbying activity should be sent to Pinterest's Procurement team (Sourcing@pinterest.com) who will liaise with the Compliance and Public Policy teams on your behalf.

- **Trade restrictions**

Pinterest is committed to complying with applicable international trade restrictions, including US sanctions programs. Trade restrictions include economic sanctions, embargoes, export and import controls, and anti-boycott rules. These laws limit our ability to do business with or provide our services, products and technologies to certain individuals, entities, governments and countries. Pinterest requires its suppliers to abide by applicable laws and not to cause Pinterest to violate any relevant trade restrictions. A supplier working with Pinterest must follow US sanctions and trade restrictions in the conduct of its business with Pinterest, even if the supplier is not otherwise subject to those requirements.

Protect Pinterest's assets

- **Confidentiality**

Information is valuable, and we need to be careful with Pinterest's confidential information. Confidential information is any information that people outside of Pinterest don't generally know about or have access to, as well as any information that third parties give to Pinterest in confidence. Our suppliers must abide by the terms of any confidentiality agreement that applies to Pinterest's confidential information or to you. If you're not sure whether something is confidential, ask Sourcing@pinterest.com for help.

- **Insider trading**

Don't trade stock or other securities of Pinterest on the basis of material, non-public information, including confidential information, and don't pass on such information to other people so they can trade. Material, non-public information is any information that has not been disclosed to the public and that a reasonable investor might use to buy, sell or hold stock in a company. All information about Pinterest, including information about its performance, its business plans and strategies, is potentially material, non-public information.

- **Protecting sensitive data**

If you have access to Pinterest employee data, Pinner data, or client data as part of your work for Pinterest, we expect you and your staff to access and use such data only in connection with a legitimate Pinterest business purpose, in accordance with your contract with Pinterest, our [Privacy Policy](#), and applicable law. Furthermore, we expect you to maintain robust Security and Data Privacy practices to ensure they align to industry best practices and applicable legal requirements, and operate in a safe and secure manner.

- **Intellectual property**

Our brand is one of our most valuable assets. As appropriate for your work with Pinterest, follow our [brand guidelines](#) to ensure Pinterest is always presented as honest, authentic,

vibrant, energetic, interesting, unique, and inspiring. We expect you to protect intellectual property rights, safeguard Pinterest's trade secrets and inventions, and comply with all of the requirements in your agreements with Pinterest. You may not use our logo or brand name (including on your website or marketing materials) without our written authorization.

- **Speaking for Pinterest**

Unless specifically authorized in your agreement with Pinterest, you may not speak publicly on Pinterest's behalf.

- **Workplace safety, security and privacy**

Pinterest is committed to providing a clean, safe and violence-free workplace, and expects its suppliers to do the same. We strive to protect the natural world and expect suppliers to comply with all applicable environmental, health and safety laws. We don't tolerate threats, hostility, disrespectful conduct, or aggressive acts in our workplace, and weapons are not permitted on any Pinterest premises. Alert the Pinterest Security team immediately to report any concerns about unsafe conditions, accidents or injuries on Pinterest premises by calling the Pinterest Global Security Operations Center at +1 (628) 600-4073 or emailing pinpatrol@pinterest.com.

To protect the company, enforce our policies, or comply with law, Pinterest may view, search, and save relevant information and communications on company-owned devices and personal devices in accordance with our device management policies. Pinterest may also perform physical searches, use video surveillance, and control or restrict access of Pinterest premises as permitted by law. We expect you to adhere to Pinterest's security requirements, in accordance with applicable law.

Be a good employer

- **Human rights**

Pinterest is committed to respecting human rights, including the principles recognized in international human rights standards like the [Universal Declaration of Human Rights](#) (UDHR). Our suppliers should share the same goals and must comply with all applicable legal requirements related to human rights. When local laws are in conflict with internationally recognized human rights standards, you should comply with the law while promoting the principles set forth in this Supplier Code of Conduct.

Modern forms of slavery and human trafficking have no place in Pinterest's supply chains or our business. Our suppliers must comply with all applicable laws related to human trafficking and the prevention of modern forms of slavery. Pinterest has no tolerance for the use of forced, compulsory, or child labor. Suppliers must comply with applicable wage and hour labor laws and regulations, and should ensure appropriate work hours and pay fair wages for their staff in line with the standards set out in the International Labour Organization's (ILO) [Declaration on the Fundamental Principles and Rights at Work](#).

- **Harassment, discrimination, and equal employment opportunity**

We want to have the best qualified people working for Pinterest. Pinterest is an equal opportunity employer and makes employment decisions on the basis of merit. In addition, Pinterest is committed to providing a work environment that is free of discrimination, harassment, mistreatment, and retaliation. We prohibit unlawful discrimination, harassment and retaliation in employment, as set out in our internal policies, and expect our suppliers to maintain equivalent work environment and standards for their own workforces.

- **Diversity and inclusion**

Having a diverse and inclusive team is critical to Pinterest’s ability to build products and services that inspire everyone. We expect our suppliers to value the individual backgrounds, experiences, differences, and capabilities of its workers. In selecting suppliers, we favor suppliers that embrace inclusive principles and reflect the diverse backgrounds of our staff and our Pinners globally. We won’t partner with anyone whose practices and company policies discriminate on the basis of race, gender, gender expression, sexual orientation, religion, or other classes protected by applicable law. Whenever possible we seek out partners who go above and beyond the law in addressing underrepresentation and biases that impact marginalized and underrepresented communities.

Reporting

It’s very important that any suspected non-compliance with this Supplier Code of Conduct—and any other suspected unethical behavior, violations of company policy, or illegal conduct—be reported to Pinterest. Pinterest takes reports very seriously. We will promptly and thoroughly investigate all credible concerns raised, and expect you and your staff to cooperate with the investigation. We always try to keep investigations confidential to the extent possible and in accordance with law. There are lots of ways to report:

Pinterest’s Procurement team at Sourcing@pinterest.com

Pinterest’s Business Conduct office at BusinessConduct@pinterest.com

Web portal (option to remain anonymous): <https://pinterest.ethicspoint.com>

Telephone hotline (option to remain anonymous): 844-704-6249

For toll-free calling from outside the US, follow these [dialing instructions](#).

Snail mail (option to remain anonymous):

Pinterest, c/o Chief Compliance Officer

505 Brannan Street

San Francisco, CA 94107

Your compliance with this Code

You are responsible for communicating and training your staff, subcontractors and other representatives about these principles, including by making them aware of the Pinterest

reporting channels noted above. Failing to meet the expectations in this Supplier Code of Conduct may affect your current or future business with Pinterest. If this Code conflicts with your written agreement with Pinterest, that agreement controls with respect to the inconsistency.

Pinterest will update this Supplier Code of Conduct from time to time. The current version is available on our website at <https://investor.pinterestinc.com/governance>.

First effective date: August 1, 2020