



Code of Business Conduct & Ethics

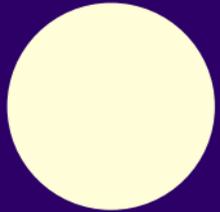
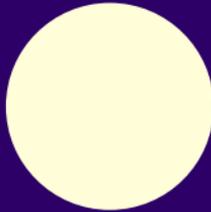
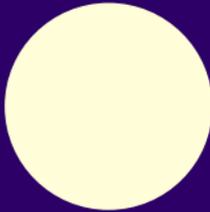
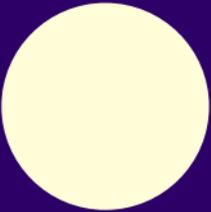
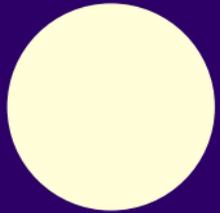
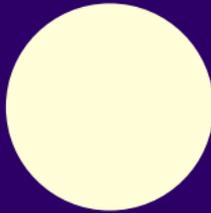
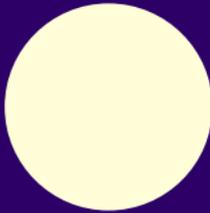
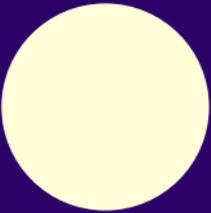
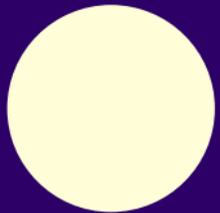
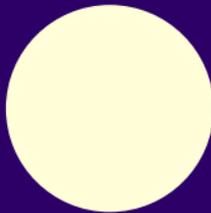
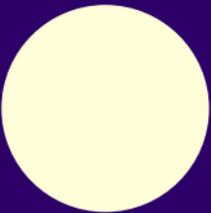
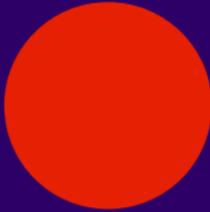


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The way Pinnerers find inspiration on Pinterest may evolve, but the way we deliver it must always stay the same: *We act with integrity*. Today I'm sharing our updated Code of Business Conduct & Ethics, which sets out legal and ethical expectations for our Pinterest team around the world. Please read through the Code and reach out to the Compliance team with any questions. Thank you for your commitment to doing the right thing, and to inspiring Pinnerers everywhere.

Ben Silbermann, Co-founder and CEO

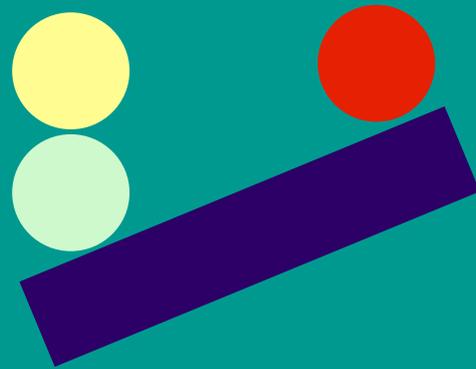


Pinterest is the home of inspiration. Each day we work hard to bring everyone—Pinner and each other—the inspiration to create a life they love. This Code of Business Conduct & Ethics sets out Pinterest’s expectations for running the business in accordance with Pinterest’s values.

Complying with the law is important, but we go further: we also act ethically and responsibly, protect the company, embrace inclusion and diversity, maintain a welcoming and supportive workplace culture, and treat our colleagues and members of the Pinterest community with professionalism and respect. We speak up if we see something wrong, and we ask for help when we need it.

The Code of Business Conduct & Ethics applies to Pinterest, Inc. and its subsidiaries and controlled affiliates (“Pinterest”) and to Pinterest employees, officers, and board members (each “you”) located anywhere in the world. “We” means you and Pinterest. Pinterest expects its contingent workers, consultants, and others who have temporary assignments with Pinterest to adhere to this Code in connection with their Pinterest work, and failure to do so could result in an end to their relationship with Pinterest. Similar expectations for Pinterest’s suppliers are set out in our Supplier Code of Conduct. We also expect visitors, partners and other third parties to engage with us professionally and contribute in positive ways to a welcoming and inclusive workplace.

Company policies and resources referenced in this Code are available in the Pinterest Policy Center on our company intranet.



Act with
integrity

We always act ethically
and follow our policies and the
law. Use good judgment and
be transparent.

Compliance with applicable law

Our Pinner community shares ideas and experiences and seeks inspiration from all corners of the world. As a global company, we respect all applicable law, including local laws and regulations that apply to Pinterest's business. Comply with applicable law and follow our Pinterest policies and procedures. Ask the Legal team if you have any questions about whether or how the law applies.

Conflicts of Interest

We all work hard to drive Pinterest's success. We want you to have friends at work and pursue activities you feel passionate about, but we also need to manage these situations responsibly on behalf of Pinterest. Avoid circumstances in which a personal financial interest, a professional opportunity, a close personal relationship, or other situation

creates a conflict between what's best for you personally and what's best for Pinterest. Even situations that could create a conflict in the future, or may appear to be a conflict to an outsider, can be problematic.

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:

- You're an employee, officer, director, contractor, consultant, advisor, or other service provider (paid or unpaid) of any organization other than Pinterest.
- You are a member of the board of directors of any organization other than Pinterest, whether commercial or charitable, including a family business.
- You or someone with whom you have a close personal relationship have a significant financial interest in a Pinterest partner, supplier, or competitor. It could be significant to you or significant to the other party. In this Code, a "partner" is an advertiser, agency, or other business partner.
- You have a close personal relationship with:
 - someone at a Pinterest partner or supplier, and

your job at Pinterest involves working with that partner or supplier;

- someone at Pinterest whose role may reasonably present a conflict with yours (e.g., you have a reporting relationship, you are a senior leader, one of you has influence over the budget, performance review, or compensation of the other); or
 - a member of the Pinterest external audit team.
- You or a person with whom you have a close personal relationship are a government official. Pinterest's Anti-Bribery Policy explains what "government official" means.

Submit a disclosure form describing your situation. Pinterest will review your disclosure and let you know whether any action is needed. In some cases, your work at Pinterest may not be compatible with a conflict of interest situation. If the conflict can't be otherwise resolved, changes to your role may be necessary, such as new reporting lines, different responsibilities, or in some cases, ending your employment or services agreement.

Even if there isn't a conflict of interest situation, you may need to disclose a close personal relationship you have with someone at Pinterest to make sure our workplace is respectful, welcoming and fair. You can find out more about what

constitutes a “close personal relationship” and what needs to be disclosed in our Relationships at Work Policy.

Prospective corporate opportunities

Pinterest relies on your commitment and hard work. Subject to your agreements with Pinterest, you can’t take for yourself personally a new idea, market opportunity, or business advantage that is discovered through the use of Pinterest property, information or position. You can’t compete with Pinterest or use Pinterest property or information for personal benefit.

Antitrust and competition

We win business through the strength of our brand, our amazing products and services, and our talented people. Play fair: don’t take unfair advantage of anyone through manipulation, concealment, misrepresentation, or any other unfair practice.

We support vibrant competition within our own business and within the business of our partners and suppliers. Comply with antitrust and competition laws, and take care when interacting with Pinterest’s competitors. Never make a deal with a competitor on how we will compete, such as by allocating markets, fixing prices, promising not to hire certain candidates, rigging bids (coordinating in a way that affects a sale or purchase process), agreeing not to pursue certain advertisers, verticals or audiences, or other

concerted action. Antitrust law can be complex, so consult with the Legal team about any competition-related matters.

Preventing bribery and corruption

We engage ethically and transparently with everyone in our ecosystem—Pinners, creators, government officials and regulators, partners, suppliers, and other stakeholders. As a global company, we are subject to anti-bribery and 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: never bribe anyone, anywhere. Don’t offer, give, or authorize the payment of anything of value to secure an improper advantage or otherwise improperly influence the decisions of others. Never solicit or accept a bribe or kickback in any form. Be mindful that a partner or advertising agency might be considered a “government official,” and take time to familiarize yourself with Pinterest’s Anti-Bribery Policy.

Gifts and donations

Giving reasonable gifts or hospitality is a customary way of building business relationships, showing respect, and demonstrating products and services. But a lavish gift could create the perception of trying to improperly influence someone’s decisions. 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 set out clear procedures for gift giving and receiving. Make sure any gift you give or receive in the course of your work for Pinterest complies with Pinterest's Anti-Bribery Policy and Gift & Hospitality Guide. We must take additional care when a government official is involved; consult Compliance first. Finally, remember that Pinterest's Sourcing team members may not accept gifts of any value.

The Pinterest in Community team is responsible for charitable giving on behalf of Pinterest to further the company's philanthropic vision. Before making a charitable donation on behalf of Pinterest—including donated advertising on the Pinterest platform—check out the Charitable Giving Policy or talk to the Pinterest in Community team. It's important that such donations comply with all applicable laws and requirements.

If you have questions about how to handle a gift situation, contact Compliance.

Political activity

While Pinterest encourages you to engage personally on issues that resonate with you, Pinterest's political

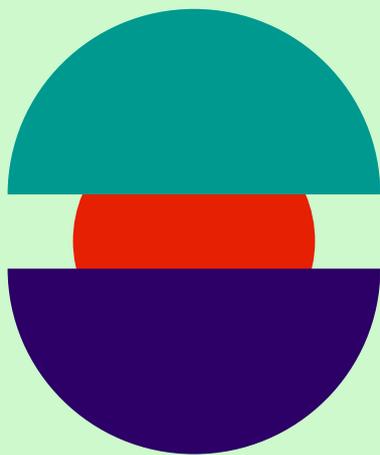
participation is managed exclusively by the Public Policy team. Examples include any Pinterest lobbying efforts and contributions (including in-kind support, such as use of Pinterest office space for events) to support key issues, public officials, or political candidates. If you need more information, refer to Pinterest's Political Engagement Policy or contact the Public Policy team.

Trade restrictions

Pinterest is committed to complying with applicable international trade restrictions, including US sanctions. 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. The rules can be complex; consult with Compliance to understand how they apply to Pinterest.



Be transparent.



Protect Pinterest's assets

Be an owner. Use good judgment in spending Pinterest's money and take care of data and other resources.

Confidentiality

In the course of your work at Pinterest, you may have access to confidential information about our business, colleagues, Pinners, or partners. 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. Pinner trends, partner metrics, and Pinterest business strategies, financial performance data, or employee information could all be confidential information, for example. Keep it confidential, even after you leave Pinterest. Access and use it only in connection with a legitimate business purpose and for Pinterest's sole benefit. Handle it in accordance with the law and our data and information security policies, such as our Acceptable Use Policy, and any confidentiality agreement that applies to that

information or to you. If you're not sure whether something is confidential, don't share it and ask the Legal team for help.

Insider trading

Don't trade stock or other securities of Pinterest or any other company 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 or sell stock in a company. You can find examples of material, non-public information in our Insider Trading Policy. Always confirm that the trading window is open before trading. Comply with all insider trading laws and our Insider Trading Policy. If you have any questions, ask the Corporate Legal team for help.

Intellectual property

Our brand is one of our most valuable assets. In everything you do, protect Pinterest's reputation by considering the impact on the hundreds of millions of Pinners and partners around the world who have chosen to inspire and be inspired with Pinterest. Follow our brand guidelines to stay aligned with the Pinterest brand identity and personality.

Pinterest is built on our intellectual property. Safeguard Pinterest's trade secrets and inventions, and comply with all of the requirements in your agreements with Pinterest. When it comes to code, protect it as you would other confidential and proprietary information and follow our information security protocols.

Similarly, respect other people's intellectual property rights. Be sure you have the right to use copyrighted, trademarked, or otherwise protected materials. Contact the Legal team if you aren't sure.

Speaking for Pinterest

Not everyone can speak publicly on Pinterest's behalf, or speak on every topic. It's important that only designated individuals disclose information about Pinterest to the public. Our Communications team handles inquiries from the media, regardless of whether they are "on the record" or "off the record." The Pinterest Investor Relations team manages any inquiries from the investment community, and our Public Policy team must be involved in any conversation with public officials and political candidates (check out the Political Engagement Policy). More information about your ability to speak publicly about Pinterest, including in online forums and on social media, can be found in our communications policies in the Policy Center.

Accurate books and records

Pinterest is legally obligated to keep records that are complete and accurate and fairly reflect our business. We also must make fair, accurate, timely and understandable disclosures to the public and to our stockholders about our operations, strategies, risks and performance. We maintain corporate controls that help us satisfy these requirements and provide reasonable assurances about the reliability of our financial reporting.

Do your part:

- Follow our company policies and procedures on financial reporting;
- Comply with Pinterest's Records Management Policy and retention requirements;
- Only commit Pinterest to legal obligations that are within your authority, as set out in the Commitment & Signature Authority Policy and other relevant policies;
- Stick to our Travel & Expense Policy. Spend Pinterest's money wisely, ensuring the expense is reasonable and for a legitimate business purpose. Make sure to record it properly in our books and records (for example, time cards, expense reports, travel records);
- Manage suppliers closely and follow the Global Purchasing Policy;

- Submit accurate and truthful certifications about matters within your area of responsibility when requested; and
- Promptly report any suspected fraud or policy violations through our established reporting channels. You can find those reporting channels at the end of this Code.

Tools and workplace privacy

Pinterest provides access to tools, technology, software and hardware, office space, and other assets to power your productivity at work. Take good care of these assets and use them with Pinterest's interests in mind. Reasonable, incidental personal use—reading reviews of the new pizza spot before dinner, for example—isn't a problem, but otherwise use Pinterest assets only for Pinterest work and follow all of our policies and requirements. Never use our systems for things that are illegal or would damage our brand. You can find more information in our Acceptable Use Policy.

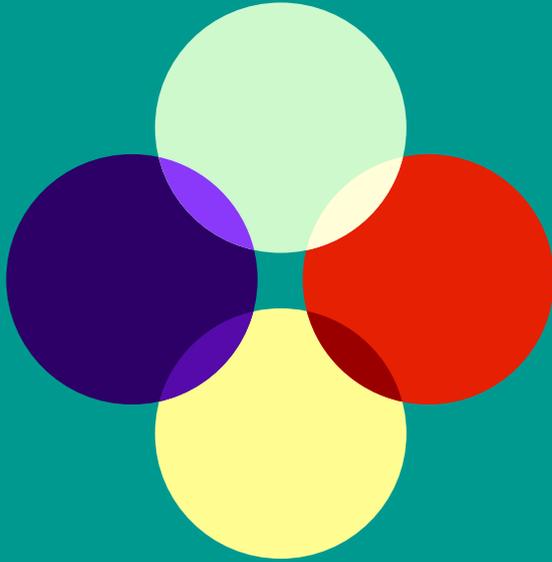
To protect the company or comply with law, Pinterest may view, search and save relevant information and communications on company-owned devices and personal devices in accordance with our device management policies. Pinterest may also perform physical searches or video surveillance of your workspace or your property on Pinterest premises as permitted by law. You can find employee privacy notices in the Policy Center.

Security

Help protect our property, our network security, and our collective safety by following Pinterest's security requirements. Wear your Pinterest badge at all times and notify PinPatrol immediately if you see someone here without one. Help fight against phishing attacks and other cybersecurity threats by clicking with caution, securing Pinterest devices, and adhering to our infosec protocols. Don't do anything to circumvent or disable our security systems. Contact the Pinforesec team immediately if you think there might be an information security issue (for example, your laptop is stolen or someone has your network password).



Be an owner.



Be a good
coworker

Individual success depends on
the success of our collective team.
Each of us is responsible for creating
a safe, respectful and inclusive
community at work.

Inclusion and Diversity

Pinterest strives to build products and services that inspire everyone. Having a diverse and inclusive workforce is critical to achieving this aspiration. By bringing together different talents, experiences and perspectives, we will accelerate our progress in product development, growth, monetization and other key strategies. Pinterest values your individual identities, backgrounds, experiences, differences and capabilities and expects you to do the same with your colleagues.

Equal Employment Opportunity

We want to have the best people in every job. Pinterest is an equal opportunity employer and makes employment decisions on the basis of qualifications. We prohibit unlawful discrimination based on race, color, ethnicity, national origin, religion, sex (including pregnancy, childbirth, or related

medical conditions), sexual orientation, gender, gender identity, gender expression, age, marital status, status as a protected veteran, physical or mental disability, medical condition, genetic information or characteristics (or those of a family member), or any other consideration made unlawful by applicable federal, state, or local laws. Discrimination based on a perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics, is also prohibited.

Harassment and discrimination

Pinterest is committed to providing a work environment that is free of discrimination, harassment, mistreatment and retaliation. Comply with our Respect in the Workplace Policy and share any concerns through one of the channels noted below.

Respectful interactions

We work closely with our Pinterest teammates to inspire Pinners and ourselves. Help keep Pinterest a place where everyone feels comfortable doing their best work. Communicate openly, professionally and inclusively. Never record someone without their consent, including on video conferences. Observe our Alcohol & Drug Policy and don't do anything that interferes with your colleagues' productivity or ability to collaborate. Assume best intentions

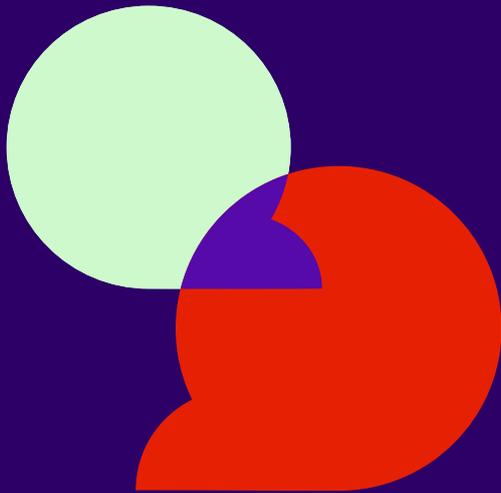
and be sensitive to how your words and actions impact those around you. Remember that we all learn from each other: look for common ground and respect our cultural and personal differences.

Workplace safety

Pinterest is committed to providing a clean, safe and violence-free workplace. We strive to protect the natural world and to comply with all applicable environmental, health and safety laws. You're expected to do your part by adhering to any health or safety requirements Pinterest might issue, not creating a significant health or safety hazard at work, and telling Workplace about unsafe conditions, accidents or injuries. We don't tolerate threats, hostility, disrespectful conduct, or aggressive acts, and weapons are not permitted on Pinterest premises— if you have safety concerns alert PinPatrol right away.



Build an inclusive community



Speak up

If you have a question or see something wrong, speak up.

Just ask

Sometimes ethical issues are not clear-cut. If you aren't sure how to comply with the letter and spirit of this Code, talk to your manager, the People team, or Compliance—they're here to help.

Reporting and enforcement

Pinterest wants to support a work culture where everyone feels comfortable doing their best work. It is very important that you report any suspected violations of this Code, as well as any other suspected unethical behavior or illegal conduct. If you're a manager, you're required to report. But if you're uncomfortable for any reason, even if you don't think it rises to the level of a policy violation, we encourage you to reach out. Pinterest takes reports very seriously and will promptly and thoroughly investigate all credible concerns raised. When asked, you're expected to help us with our investigations as needed. Check out the investigations guide in the Policy Center to learn more about what happens when you report a concern.

You can make a report anonymously if you wish, though it is often helpful if you are willing to speak with the investigator. We always try to keep investigations confidential to the extent possible and in accordance with law.

There are lots of ways to raise an issue:

- codeofconduct@pinterest.com
- Your manager
- Your HRBP or a member of the People Experience team
- Pinterest's Chief Compliance Officer or a member of the Compliance team
- A lawyer on Pinterest's Legal team
- 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, visit
<https://pinterest.ethicspoint.com>.

Non-retaliation

You can come forward with any questions or concerns without fear of retaliation. Pinterest will not tolerate retaliation against anyone for seeking advice, making a good-faith report of suspected misconduct, or for participating in the investigation of suspected misconduct.

Compliance with this Code

Violations can be serious.

Failing to adhere to this Code could have serious consequences for you and for Pinterest. In addition to hurting our reputation, in some cases non-compliance may violate the law and could result in litigation, civil and/or criminal penalties, fines, and even imprisonment. In addition, your failure to comply with this Code can result in disciplinary action, up to and including termination.

Changes and waivers

Pinterest will update this Code from time to time. The current version is available in the Pinterest Policy Center on our company intranet. Material changes must be approved in writing by the Pinterest, Inc. Board of Directors. Any waiver to this Code must be approved in writing by the General Counsel or their delegate; any waiver for a Pinterest officer or board member must be approved by the full Pinterest, Inc. Board of Directors and promptly disclosed in accordance with legal requirements.

Revised: Oct. 5, 2021



Resources

Company policies and resources referenced in the Code are available in the Pinterest Policy Center

Confidential hotline: 844-704-6249 or <https://pinterest.ethicspoint.com>

