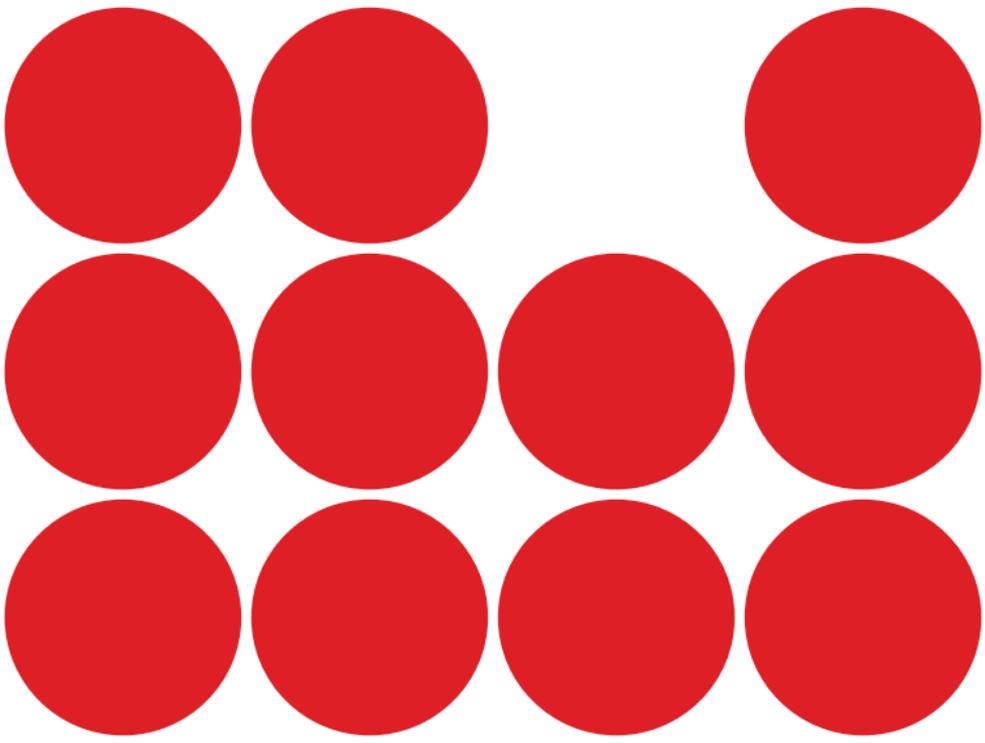


Code of Business Conduct & Ethics



Act with integrity

“Act with integrity” has guided our business choices since Pinterest was founded. We want to do what’s right by our Pinners, right by our partners, right by our stockholders, and right by one another.

This Code of Business Conduct & Ethics helps us determine what is right by setting out Pinterest's expectations for running the business in accordance with the Pinterest values. Complying with the law is important, but we go further: we also act ethically and responsibly, use good judgment, protect the company, and treat our colleagues and members of the Pinterest community with respect. We speak up if we see something wrong, and we ask for help when we need it.

We inspire both with Pins and with our own behavior as a company. When faced with a dilemma, think carefully: how would you feel if your words or actions appeared in millions of Pinners' home feeds? Put Pinners first, and make them proud.

This 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 also 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.

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

**Operate
honestly**



We always act ethically. Follow our policies and the law and be transparent.

Compliance with applicable law

Our Pinner community shares ideas and experiences from all corners of the globe. At Pinterest, we respect all applicable law, including local laws and regulations that apply to our 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 a law applies to us.

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 (including a romantic or a familial 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 an employee of a Pinterest partner or supplier, and your job at Pinterest involves working with that partner or supplier.
- You have a close personal relationship with someone working for 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).
- You have a close personal relationship with 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.

Promptly send a disclosure to the Business Conduct office 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.

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. Understand and respect 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, 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-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. Take time to familiarize yourself with Pinterest's Anti-Bribery Policy.

Gifts

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.

Before making a charitable donation on behalf of Pinterest—including donated advertising on the Pinterest platform or use of Pinterest office space for events—talk to the Social Impact 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 the Legal Team or Compliance to understand how they apply to Pinterest.

Protect Pinterest's assets



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

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. 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. Internally, exercise discretion and only share confidential information with those who need to know it. Use confidential information only to the extent necessary to do your job, and for Pinterest's sole benefit. Handle it in accordance with 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, sell or hold stock in a company. All information about Pinterest or its business plans is potentially material, non-public information. Comply with all insider trading laws and our policies on insider trading.

Protecting employee data

As an employer, Pinterest has personal data about its employees and other staff around the world. Access and use such data only in connection with a legitimate business purpose, in accordance with Pinterest policies and applicable law.

Protecting Pinner data

Pinterest's Privacy Policy explains to Pinner how we use their data. Adhere to our data use and information security protocols to ensure we satisfy our commitments to Pinner regarding the collection, use, protection, and retention of Pinner data. Don't access or use Pinner data for any reason other than the purposes set out in the Privacy Policy.

Protecting partner data

We are good stewards of our partners' confidential information, too, and are contractually obligated to protect it. Don't access, use or share any confidential or proprietary information received from advertisers, agencies, or other business partners unless they expressly permit you to do so. Never share commercially

or competitively sensitive information about one partner with another partner.

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 use the Pinterest platform. Follow our brand guidelines to ensure Pinterest is always presented as honest, authentic, vibrant, energetic, interesting, unique, and inspiring.

The Pinterest platform 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." Pinterest Investor Relations manages any inquiries from the investment community, and our Public Policy Team must be involved in any conversation with public officials and political candidates. More information about

your ability to speak publicly about Pinterest, including in online forums and on social media, can be found in our Speaker Policy and our External Communications Guidelines.

Accurate books and records

Pinterest is legally obligated to keep records that are detailed, accurate, and fairly reflect our business. We also must make full, 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
- Spend Pinterest's money wisely, ensuring the expense is reasonable, for a legitimate business purpose, and is recorded accurately and fairly in our books and records (for example, time cards, expense reports, corporate card transactions, travel records)
- Manage suppliers closely and follow the Pinterest 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—checking your personal email account or 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. 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.

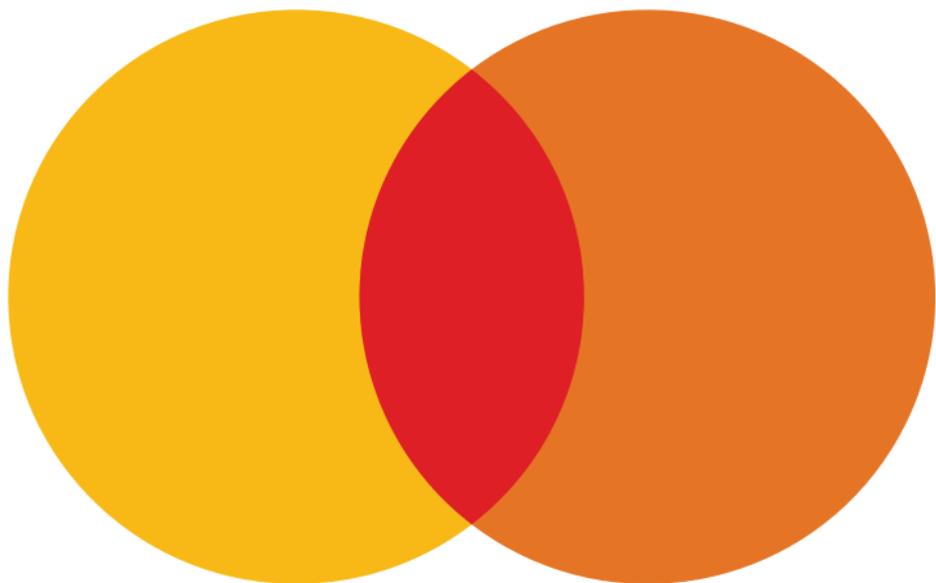
Security

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 Security 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. Contact the Information Security team immediately if you think there might be a 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.

Diversity and inclusion

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 and perspectives into a room, we will accelerate our progress in product development, growth, monetization and other key strategies. Pinterest values your individual backgrounds, experiences, differences, and capabilities, and expects you to do the same with your colleagues.

Equal employment opportunity

We want to have the best qualified people in every job. Pinterest is an equal opportunity employer and makes

employment decisions on the basis of merit. 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. Pinterest expects you to adhere to Pinterest's policies and the law in this regard.

Harassment and discrimination

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

Respectful communication

We work closely with our Pinterest teammates to inspire Pinner and ourselves. Care with candor. Communicate openly, professionally and inclusively. Assume best intentions. Be sensitive to how your words and actions impact those around you, and respect our cultural and geographic differences. Remember that we all learn from each other.

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.

We don't tolerate threats, hostility, disrespectful conduct, or aggressive acts, and weapons are not permitted on Pinterest premises. Alert Security immediately to report any concerns about unsafe conditions, accidents or injuries.



**Be responsible
for creating an
inclusive community
at work.**

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, your HRBP or People Experience partner, the Chief Compliance Officer, or someone on the Legal Team—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. 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.

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:

- Your manager
- Your HRBP or People Experience partner
- Pinterest's Business Conduct office
- Pinterest's Chief Compliance Officer
- Anyone 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, follow the dialing instructions at <https://pinterest.ethicspoint.com>
- Snail mail (option to remain anonymous):
Pinterest
c/o Chief Compliance Officer
651 Brannan Street
San Francisco, CA 94107

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 his/her 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.



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>