

At Optimizely, we are committed to conducting business ethically and with integrity, and we expect our business partners to share in this commitment. This Optimizely Business Partner Code of Conduct (“**Code**”) articulates our own commitment and outlines the standards and practices that Optimizely expects our business partners to follow while conducting business with or on behalf of Optimizely. This Code applies to all of our business partners, including agency partners, technology partners, service provider partners, and any vendors, service providers, suppliers or other parties providing goods or services to or on behalf of Optimizely. All Optimizely business partners are required to read and comply with these standards and to ensure that the requirements are communicated, understood, and followed by their employees, agents, contractors and consultants.

This Code defines the minimum standards of business conduct and acceptable business practices we expect of all of our business partners. All business partners are required to have effective policies, documentation and controls that, at a minimum, incorporate the requirements contained in this Code and the laws and regulations applicable to the business of the partner. If local laws and regulations are more permissive than this Code, the partner is expected to comply with the Code. If local laws and regulations are more restrictive, the partner must always comply with those legal requirements.

COMMUNICATIONS REGARDING OPTIMIZEZY

All statements, communications, and representations to Optimizely customers must be accurate, complete, and not misleading in any way. Similarly, business partners must not make or attempt to make any written or oral agreements or commitments on behalf of Optimizely, including product feature commitments, without written authorization from Optimizely.

FINANCIAL INTEGRITY AND ACCURATE RECORD KEEPING

The accuracy of books and records is essential to Optimizely to meet legal and regulatory obligations. Business partners must maintain accurate and complete books and records related to their agreements with Optimizely and all transactions with respect to any Optimizely-related business. Any documentation, information and submissions that business partners provide to Optimizely and/or our joint customers must be complete, accurate and not misleading in any way. Business partners must not facilitate the creation or preparation of any false, misleading, or inaccurate records or documents. Business records must be maintained in accordance with all applicable laws and regulations, information and to whom Optimizely may send or allow access to its products, services and information. Business partners must strictly comply with all applicable trade compliance laws, including laws that control the import, export and re-export of Optimizely products, services and information and laws that restrict dealings with sanctioned entities or individuals or in countries subject to trade embargoes or economic sanctions.

GOVERNMENT CUSTOMERS

Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with government entities as well as businesses that are government-owned, government-controlled or subject to government procurement rules (“**Government Customers**”). Business partners that sell to Government Customers must observe all laws, rules, procurement regulations and contract clauses that relate to the acquisition of goods and services by such Government Customers, whether such sale is direct or indirect and including marketing or recommendation of Optimizely products and/or services.

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LABOR AND HUMAN RIGHTS

Optimizely is dedicated to upholding the human rights of all workers. This applies to all workers, including temporary, migrant, student, contract, and direct employees. Partners must manage their workforce to achieve the following:

- Dignity and Respect: Treat all workers with dignity and respect.
- Forced Labor: Prohibit the use of forced or involuntary labor.
- Child Labor: Ensure all workers meet the local minimum working age requirements.
- Discrimination: Select workers based solely on their ability to perform a job without discrimination.
- Harassment or Abuse: Maintain a workplace free from all forms of harassment and abuse.
- Wages & Benefits: Comply with applicable wage and benefit laws.
- Working Hours: Adhere to work hour laws, ensuring maximum hours and rest periods.

HEALTH & SAFETY IN THE WORKPLACE

Partners must integrate health and safety requirements in its business processes to provide a safe work environment, including:

- Health & Safety: Maintain a clean, safe, and healthy work environment.
- Emergency Preparedness: Implement comprehensive emergency plans and procedures.

ENVIRONMENTAL

Optimizely values environmental responsibility. Partners should integrate the following into their operations:

- Environmental Permits and Reporting: Maintain current environmental permits and comply with requirements.



- Pollution Prevention and Resource Reduction: Minimize resource consumption and greenhouse gas emissions.
- Hazardous Substances: Safely manage hazardous materials.
- Waste Management: Reduce or manage waste responsibly.

ETHICS AND COMPLIANCE

Partners must uphold the highest standards of ethics.

- Conflicts of Interest: Avoid conflicts of interest, including not engaging directly with any Optimizely employee who has a significant financial interest in the Partner.
- Gifts: Avoid giving gifts that could create conflicts of interest.
- Training and Communication: Implement training programs to educate employees on Code requirements.
- Whistleblower Protection: Provide mechanisms for anonymous reporting of Code violations and protect whistleblowers from retaliation.

PROTECTING INFORMATION

Partners must respect intellectual property rights, protect confidential information, and comply with privacy and security standards and laws. This includes:

- Intellectual Property: Respect and safeguard intellectual property rights.
- Security: Maintain a robust security program using industry standard security measures and report any incidents involving Optimizely data.
- Privacy: Comply with privacy laws, secure personal data, and only use personal data for the purpose it was provided.

ASSESSMENTS

Partners will periodically evaluate compliance with this Code and allow Optimizely to conduct assessments. Partners must address any deficiencies identified. Any violations of this Code may jeopardize a Partner's business relationship with Optimizely.

REPORT IMPROPER CONDUCT

The partner will immediately report events of questionable, fraudulent or illegal nature that are, or may be, in violation of this Code, or other applicable laws or regulations, to Optimizely in one of the following methods: (1) contact Optimizely's Chief Partner Officer, (2) contact Optimizely Integrity at integrity@optimizely.com, (3) use the Optimizely Ethics Helpline at Ethics Hotline [NAVEX One](#), or (4) contact Optimizely's General Counsel. Calls to the Ethics Helpline are received by an independent third-party service specifically retained by Optimizely to handle such reports in countries where applicable reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law.

VIOLATIONS

Any violations will be reported to the business partner's management for their attention, and if appropriate, corrective action. Optimizely may also enforce violations of this Code by taking other action(s) as it deems appropriate, including suspension or termination of the business partner's relationship with Optimizely.

CHANGES TO THE PARTNER CODE OF CONDUCT

This Code is subject to updates by Optimizely.