

OPTIMIZEZY PARTNER CODE OF CONDUCT

Optimizely is committed to a high standard of ethical conduct and social and environmental responsibility. Optimizely expects its Partners to aspire to these same standards. Accordingly, Optimizely has created this Partner Code of Conduct (“PCoC”), which sets out the standards expected of any Partner doing business with Optimizely.

This PCoC is drawn from industry codes of conduct, the International Labor Organization Conventions, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and applicable laws. It aligns with Optimizely’s employee Code of Conduct, and also our Code of Conduct for Optimizely’s contractors and consultants and other service providers.

I. ETHICS AND COMPLIANCE

Partner will uphold the highest standards of ethics to promote honesty and integrity in business operations .

Business Integrity. Partner will avoid even the appearance of conflicts of interest when working with Optimizely and will immediately disclose any known family or other close personal relationships with Optimizely employees who have an influence over their engagements with us. If Partner extends any business courtesies to Optimizely employees, they will do so infrequently, and the courtesies must be of no more than moderate value. Partner will also accurately reflect their business dealings in their books and records. Partner will not offer or accept any form of bribery, corruption, extortion, or embezzlement. Partner will not make illegal payments directly or indirectly. Partner will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

Conflicts of Interest. Partner must not directly engage with any Optimizely employee whose spouse, domestic partner, relative, or other family member is employed by or holds a significant financial interest in the Partner.

Gifts. Partner will avoid gifts to any Optimizely employee when the circumstances create or appear to create a conflict of interest.

Fair Business, Advertising & Competition. Partner will obey applicable laws and uphold industry and regulatory standards of fair business, advertising, and competition.

Insider Trading Laws. Partners must comply fully with applicable insider trading and securities laws governing the possession or access to material, non-public information about Optimizely or other companies, including other Optimizely partners or Optimizely customers. Partner must not communicate such information to others who might trade on the basis of that information.

Government Customers. When engaging with government entities or businesses that are government-owned, government-controlled, or subject to government procurement rules (“Government Customers”), certain activities that may be acceptable when dealing with non-government customers can be improper or even illegal. Partners selling to Government Customers must strictly adhere to all applicable laws, regulations, procurement rules, and contract clauses related to the purchase of goods and services by such Government Customers. This applies to both direct and indirect sales, including any marketing or recommendations involving Optimizely products and/or services.

Training and Communication. Partner must implement training and communication programs to educate its employees regarding the requirements of this PCoC. Partner must maintain a process for communicating clear and accurate information about its policies to its workers and customers.

Employee and Contractors. Partners must ensure their employees, contractors, agents, technology partners and other parties whom they engage in any capacity within the scope of their services to Optimizely under the applicable Partner Program aspire to and meet this PCoC standards. Partners must maintain a program to assess adherence and compliance

Whistleblower Protection. Partner will provide an anonymous complaint mechanism for its employees to report possible violations of this PCoC and Partner’s own code of conduct. Partner will protect whistleblower confidentiality and prohibit retaliation.

Responsible Materials Sourcing. Partner will adopt and maintain a policy and exercise due diligence on the source and chain of custody of metals and minerals included in the Partner’s supply chain to reasonably assure that they are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

Reporting Questionable Conduct. Partner should report possible violations of this PCoC or other questionable behavior. Report by email at integrity@optimizely.com.

II. PROTECTING INFORMATION

Partner must respect intellectual property rights, protect confidential information, comply with security standards, policies, and controls, and comply with privacy rules and regulations.

Disclosure of Information. Partner will disclose information regarding business activities and structure, financial situation, and performance in accordance with applicable law and prevailing industry practices. Falsifying records and misrepresenting conditions or practices are prohibited.

Intellectual property. Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and confidential information is to be safeguarded.

Security. Partner must maintain a security program that implements industry standard controls for assessing risk, protecting customer data with adequate controls, and assuring continued delivery of services. Partner must report any potential incident involving Optimizely customer data (internally or through a partner) as soon as possible.

Privacy. Partner will (i) comply with all local privacy and data protection laws; (ii) have appropriate processes and practices to secure and protect personal data; (iii) use personal data only as agreed to by Optimizely representatives or Optimizely's customers; and (iv) cooperate with Optimizely compliance efforts.

III. LABOR AND HUMAN RIGHTS

Optimizely is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including temporary, migrant, student, contract, direct employee, and any other type of worker.

Dignity and Respect. Partner must uphold the human rights of workers and treat them with dignity and respect. This applies to all workers, including without limitation, temporary, migrant, student, and juvenile contract, and dispatch workers, as well as direct employees.

Forced Labor. Partner will not use forced, bonded (including debt bondage), indentured, or involuntary prison labor, and will not engage in slavery or trafficking of any person. Partner will ensure that workers have access to their personal documentation (e.g., government-issued identification, passports, or work permits), and will pay any agency recruitment/employment fees and expenses.

Child Labor. All workers shall be at least the local minimum legal working age. The facility must take all necessary precautions to ensure that authorized young workers are protected from working conditions that could pose a danger to their health, safety, or development.

Discrimination. Workers must be selected only on the basis of their ability to do the job. Partner must not discriminate in employment, including hiring, compensation, advancement, termination, or discipline, on the basis of sex, gender identity, race, religion or belief, age, disability, illness, sexual orientation, pregnancy, marital status, civil partnership, nationality, political opinion, social or ethnic origin, or other protected status. All workers, regardless of gender, shall receive equal pay for work of equal value.

Harassment or Abuse. Workers must be treated with respect and dignity. No worker shall be subject to humiliating or corporal punishment, and the workplace must be free from all forms of physical, sexual, psychological, or verbal punishment, coercion, intimidation, harassment, or abuse.

Wages & Benefits. Partner will comply with all applicable wages and benefits laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

Working Hours. Partner will comply with and respect all applicable work hours and overtime laws, set the maximum at 60 hours/week (or lower if local law requires), including overtime, except in emergencies, and guarantee at least one full day off every 7 days.

IV. HEALTH & SAFETY IN THE WORKPLACE

Partner will integrate the following health and safety management requirements into its business processes to provide workers with a healthy and safe work environment.

Health & Safety. Partner must provide a clean, safe, and healthy work environment and take steps to prevent accidents, illness, and injury arising out of or occurring during the course of work. Workers must always have access to sanitary facilities, which should be adequate and clean. Workers must be provided at no cost with all the appropriate personal protective equipment. Where dormitories and canteens are provided to workers, the same standards apply.

Emergency Preparedness. Partner will implement emergency plans and procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, fire detection and suppression equipment, adequate means of egress, and recovery plans.

V. ENVIRONMENTAL

Optimizely recognizes that environmental responsibility is integral to producing world-class products.

Environmental Permits and Reporting. Partner will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.

Pollution Prevention and Resource Reduction. Throughout their operations, Partner will work to reduce consumption of resources, including raw materials, energy, and water. Partner will track, document, and seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy.

Hazardous Substances. Partner will identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal. Partner will identify, monitor, control, treat, and reduce hazardous emissions, wastewater, and waste generated from its operations.

Waste Management. Partner will work to reduce or eliminate waste of all types. Where waste cannot be eliminated, Partner will manage and control all waste streams to comply with applicable laws and regulations, and in an environmentally responsible and secure way.

VI. ASSESSMENTS

Partner will periodically evaluate its operations and those of its subsidiaries, affiliates, agents and subcontractors to ensure compliance with this PCoC.

Optimizely Assessment. Partner will allow Optimizely or an Optimizely agent to conduct an onsite assessment of any operations providing goods or services together with Optimizely. Partner will commit to timely correcting any deficiencies identified by an assessment, inspection, or other review. Any violations of this PCoC may jeopardize a Partner's business relationship with Optimizely up to and including termination.

CHANGES TO THE PARTNER CODE OF CONDUCT

This PCoC is subject to update by Optimizely from time to time.