

# ByteDance Code of Conduct

# PREFACE

The Code of Conduct (the “**Code**”) is a cornerstone of our business. The Code sets out the high ethical standards and culture of integrity which are goals of the ByteDance Group entities, its affiliates and subsidiaries (collectively, the “**Company**” or “**ByteDance**”).

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# Message from CEO

With ByteDance's rapid international expansion and growth, we continue to enrich the lives of people around the world. In this pursuit of excellence, we stand firm on the values of ethics and integrity to nurture and strengthen our organizational culture. Our Code of Conduct sets the standard for our professional conduct, and forms the basis of how we interact with each other, our customers, and third parties. The Code consists of three overarching principles:

1. Integrity - we hold ourselves and each other accountable, and uphold high ethical standards to protect our company and users;
2. Respect - we create an inclusive environment where we treat each other with mutual respect and build lasting relationships; and
3. Responsibility - we comply with laws and regulations, and conduct our business in good faith with transparency.

These principles serve as the foundation for us to continue to build a strong ethical and compliant work culture. By following these principles and holding each other accountable, we will ensure that we continue to conduct our business ethically to fulfill our obligations to the Company, colleagues, clients, vendors, and business partners. For situations where you observe others are not following the principles, speak up to help safeguard our workplace. We will not retaliate, and will not tolerate retaliation, against any individual for reporting a concern in good faith or participating in an investigation of a concern.

By working together, we will be able to achieve our mission to inspire creativity, enrich life, and ensure the sustained and robust growth of our company.

Rubo Liang

# 1. Overview

## 1.1 Application of the Code

The Code applies to all ByteDance employees, interns, members of the boards of directors, supervisors, and senior officers (collectively, “**ByteDancers**”). The Code also applies to those assigned to perform work or services for or on behalf of ByteDance, such as independent contractors, third-party associates, and outsourcing staff (collectively, “**Extended Workforce**”). “**We**” and “**You**” in the Code will refer to both ByteDancers and the Extended Workforce. Please note that nothing in the Code creates an employment relationship with the Extended Workforce.

A separate set of guidelines known as the [Business Partner Code of Conduct](#) applies to all Business Partners. The term “**Business Partner(s)**” refers to all third parties including suppliers, service providers, agents, vendors, and consultants who provide any kind of products, services, or undertake any activity for or on behalf of ByteDance.

Different countries have different legal systems, and as such, conflicts may arise between a provision of the Code and local laws or regulations. We follow the stricter guidance when there are differences with the Code, laws, or regulations. Additionally, no one should follow any portion of the Code if it is illegal under local laws or regulations. The Company will conduct periodic reviews to determine whether the Code requires revisions based on changes in laws, regulations, or developments of the Company.

## 1.2 Following the Code

### Our Responsibility

We have a responsibility as employees and representatives of ByteDance to model the Code and create a “Speak Up” culture.

**Model the Code:** We model the Code by understanding and complying with the Code and the Company’s policies. We promote a culture of integrity, and encourage adherence to our principles by using good judgment and ethical decision-making. We hold ourselves and others accountable for our respective decisions and behaviors.

**Create a “Speak Up” Culture:** We foster an environment of trust and open communications where colleagues feel comfortable coming forward if they want to talk or ask questions. We escalate concerns regarding potential violations or misconduct immediately once known or reported. We support and cooperate with investigations, and we never excuse or condone inappropriate behaviors.

We expect leaders to firmly uphold the Code, communicate its importance to their teams, and ensure that the listed expectations are met.

# 1. Overview

## Violations of the Code

In no circumstance will failure to read the Code or Company policies exempt your obligation to comply with these requirements. Violations, depending on the nature and severity, may result in disciplinary action, up to and including, termination of employment or termination of an engagement service contract, where necessary. Where there is a potential violation of law and/or policy, the Company will cooperate with the appropriate authorities.

### 1.3 Speak Up

We value everyone's voice and well-being. Furthermore, we take pride in holding ourselves and each other accountable. Please speak up if someone asks you to do something that makes you feel uncomfortable, or if you see or suspect activity that goes against our Code. By reporting misconduct, you will help contribute to the ethical culture at ByteDance.

#### Reporting Channels

You can speak up in any of the following ways:

- Contact your leader or HRBP
- [Speak Up Hotline](#)
- Ethics Office ([ethics@bytedance.com](mailto:ethics@bytedance.com))

However you choose to speak up, the Company will seriously treat and promptly address your concerns and questions. The Company will take appropriate steps to maintain confidentiality to the fullest extent possible.

## Investigations

For all concerns raised, the Company has the responsibility to take appropriate actions. This includes conducting a fair, objective, and thorough investigation. Based on the nature of the violation, the appropriate investigation team will perform an impartial review of all the facts available, maintain confidentiality to the greatest extent possible, and comply with applicable laws and regulations. The Company requires employees to cooperate fully with any inquiry or investigation by providing truthful and complete responses and information to investigators.

The Company will take appropriate action when it determines that a violation has occurred or someone was untruthful during an investigation. This includes disciplinary action where appropriate, and corrective actions to improve our policies and internal controls to prevent future issues.

## No Retaliation

The Company strictly prohibits retaliation of any kind against anyone who shares a concern in good faith or participates in an investigation. An individual would have reported in good faith if the individual reasonably believes, perceives, or suspects the information reported to be true. The Company encourages honest reporting, but does not tolerate anyone knowingly submitting a false report. Making false accusations can lead to disciplinary action as it diverts investigatory resources away from credible good faith concerns and damages the morale of those impacted.

## 2. Acting with Integrity

As employees, we hold ourselves and each other accountable to high ethical standards, and help the Company succeed by complying with the Code and the Company's policies. We are also proud representatives of the Company, and take pride in preserving the Company's image through our actions.

### 2.1 Confidentiality

The Company attributes its success in part based on innovations, intellectual property and technology. To ensure the Company's success, we recognize the importance of our responsibility to preserve and uphold data confidentiality.

To ensure that we handle confidential information appropriately, each of us needs to understand the types of confidential information and the ways to protect it. We consider all non-public information about the Company, its customers and Business Partners as confidential unless the Company clarifies that the information is public. Non-public information includes business plans, proprietary data, financial information, internal communications, organizational structure, operational information, personnel information, and information related to third parties with which the Company has non-disclosure agreements. We should not disclose confidential information to third parties, nor should we discuss it in public places. For confidential information limited to a specific range of people, you should only disclose it to those who need to use it to perform their duties and are authorized to know.

### 2.2 User and Business Partner Privacy and Information

Protecting and ensuring the privacy and safety of our users' and Business Partners' information is of the utmost importance. We arrange to take all lawful steps possible to protect user privacy and Business Partners' information during the obtaining, processing, and transferring of data. This includes personal data, customer lists, trade secrets, and patented technologies.

We abide by our policies as well as local laws and regulations regarding personal privacy and data disclosure for each country in which we do business.

### 2.3 Proper Use and Protection of Company Assets

The Company provides us with a variety of assets to allow us to complete our work tasks effectively. These assets include physical (tangible) assets such as IT hardware and equipment, and non-physical (intangible) assets such as access to internal systems, apps, and emails.

Our policies provide guidelines on proper use of assets including password use, lost/stolen items, and misuse of company assets (including improper use or over-indulgence). We must:

- use Company assets for legitimate work purposes only;
- ensure the safe and correct operation of Company assets; and
- take appropriate care to protect and secure Company assets, both in the workplace and at home.

The Company reserves the right to seek remedies should you wilfully damage assets, use assets for an unlawful purpose, fail to take good care of the assets, or fail to stop losses from increasing.

### 2.4 External Communications

With ByteDance being a high-profile global company, the media, organized events, competitors or interested external parties may contact or ask you to provide commentary. Such commentary has the potential to cause serious damage, specifically when there is a perception that the communication is on behalf of the Company, discloses non-public information, is misinterpreted, or is inaccurate.

## 2. Acting with Integrity

Any situation in which it may appear that you are representing the Company requires formal pre-approval prior to partaking in these engagements or activities. This is to ensure that the Company provides you with proper guidance and support prior to such engagements or activities.

### 2.5 Conflicts of Interest

The Company embraces and supports our private lives and endeavors. However, we have a responsibility to ensure that our personal interests do not conflict with the Company. A conflict of interest occurs when we, or someone with whom we have a significant personal relationship, has a private interest or associated business that interferes or appears to interfere with the interest of the Company.

Common situations where a conflict of interest might exist that requires disclosure include the following:

1. investments;
2. outside activities & personal intellectual property;
3. commercial cooperation & business opportunities;
4. personal relationships; and
5. personal account monetization.

You are responsible for understanding what are conflicts of interest, and proactively declaring all potential and actual conflicts via the Conflict of Interest Declaration system. Furthermore, you must cooperate with the Company and work towards remediating identified conflicts. If there are no conflicts, you are required to confirm the same on the system.

### 2.6 Preventing Fraud

We are a company that is transparent and honest as we take pride in our product and what we represent. We have the responsibility to represent the Company in a transparent and honest manner and avoid any fraudulent activity. The Company prohibits fraudulent activity, which includes any use of deception to obtain monetary or personal gain, to avoid an obligation, or to cause loss to another party. Examples of fraud include: knowingly providing false, misleading or incomplete information to the Company or Business Partners; manipulation, falsification, forgery or unauthorized alteration of any company records; and knowingly or negligently supporting or assisting any fraudulent or deceptive behavior.



# 3. Treat Others with Respect

Respect is a fundamental behavior and requirement that we exhibit to promote a positive and inclusive work culture and environment. We are a company that promotes collaboration, teamwork and the inclusion of all thoughts and ideas. We act responsibly by demonstrating respect and kindness to all team members and Business Partners.

## 3.1 Mutual Respect

We believe in providing every ByteDancer with the opportunity to reach their full potential and contribute to the Company's success. We respect and embrace diversity and believe that our collective differences make us stronger.

We commit to providing a workplace free from discrimination or harassment based on an individual's protected status. Protected status refers to an individual's personal characteristics including: race, color, age, sex, language, religion, national or ethnic origin, citizenship, marital/civil status, sexual orientation, gender identity or expression, disability, pregnancy, or any other characteristics protected by applicable laws.

We oppose any form of discrimination, workplace bullying, harassment or sexual harassment. This applies to all ByteDancers, and covers actions occurring at the workplace, and any other settings involving work. To the extent permitted by law, this also applies to dealings with external parties in the settings involving work.

The Company also provides equal employment opportunities and commits to ensuring that hiring, continued employment and performance reviews are only evaluated and based on Company policies, an individual's work performance, and not influenced by any irrelevant factors.

## 3.2 Safety and Security

Whether working remotely or in our office we prioritize the safety and security of our colleagues.

The Company has implemented robust physical security controls including the deployment of people, technology and procedures, to ensure global workplace security. These controls are constantly assessed to ensure their continued effectiveness. We have a shared responsibility to help protect our workplaces by reporting anything that could endanger or detrimentally impact personnel, property, or the Company's reputation. In the event of an emergency, please contact your local emergency authorities.

The Company has also established an Environment, Health and Safety Management System, to comply with applicable environmental, health and safety laws and regulations in the countries in which we operate. We take appropriate measures to provide a safe and healthy workplace for employees, promote employee health management, and protect environmental sustainability.

## 3.3 Drugs and Alcohol

We take great pride in being able to represent the Company through our work and the products we deliver. The Company expects us to perform our job duties without being under the influence of drugs, alcohol, or any substance that could impair job performance. Being under the influence of such substances can also pose a safety risk to yourself or others.

The Company prohibits substance abuse, including:

- working under the influence of alcohol or drugs while on Company premises or conducting work for the Company; and
- possessing, selling, distributing, or consuming illegal drugs or controlled substances while on Company premises, or conducting work for the Company.

There are occasions where the Company permits alcohol consumption (e.g., at approved Company events). In such case, when consuming alcohol in an approved setting, we should always exercise sound judgment and ensure our conduct remains professional at all times.

# 4. Doing Business Responsibly

We are a company that believes in conducting ourselves virtuously and adhering to applicable laws and regulations. We stand behind the quality of our products and services and demonstrate our responsible business practices by consistently abiding by our standards in both our daily tasks and interactions with others.

## 4.1 Anti-Corruption and Anti-Bribery

We seek to preserve our culture of integrity and ethical behavior, as well as comply with all applicable anti-corruption laws and regulations in the countries in which we operate. We prohibit bribery in all forms. You may not, whether directly or indirectly, offer, give, receive, or solicit, anything of value to improperly influence any decision or any other act or omission related to the Company's business or to obtain an improper advantage.

We do not maintain business relationships based on offering, or providing, gifts or entertainment. We understand that local business customs or etiquette may require the giving of a gift or entertainment on certain occasions. Nonetheless, the following conditions must be met when giving such gifts or entertainment:

- The gift or entertainment given should not violate applicable laws or Company policies, must have legitimate business purposes, be appropriate, and conform to local business etiquette.
- The Company prohibits offering, making any payment, or giving any lavish gift or entertainment, that could be considered a bribe, kickback, commission or advantage.
- Obtain the requisite pre-approvals for giving gifts or entertainment and maintain proper records.

## 4.2 Receiving Gifts or Entertainment

Take caution when receiving gifts or entertainment as it may bring about actual influence, or the appearance of undue influence.

Our general policy is to politely decline or return any gift or cash regardless of the value. If declining the gift or cash is culturally inappropriate or not possible, you must promptly disclose it in accordance with the policy.

Entertainment should be for business purposes only. It should not interfere or influence any business judgment. Accepting such an invitation should be done mindfully, infrequently, and should never be considered lavish or extravagant. Pre-approval from a direct leader must be obtained when the entertainment exceeds the policy threshold limit.

## 4.3 Anti-Money Laundering

We commit to complying with all applicable laws and regulations in the countries in which we operate to prevent the use of our platforms, products and services for money laundering or terrorism financing purposes, and to combat any sort of criminal activity.

- Money laundering refers to concealing the origins of money generated by a criminal activity, so that it appears to have come from a legitimate source.
- Terrorist financing refers to carrying out transactions that are linked to, or likely to be used by, terrorists or terrorist organizations.

## 4.4 International Trade Compliance

We commit to complying with applicable trade laws and regulations, trade sanctions, export controls, and other trade-related laws and regulations that apply in the countries in which we do business. We also prohibit business activities, or other dealings, with sanctioned regions and parties that may lead to any violation.

# 4. Doing Business Responsibly

## 4.5 Fair Competition

We believe in free, fair and honest competition and should avoid any conduct that unfairly restricts trade. Antitrust or competition laws protect consumers and markets against unfair business practices, and promote and protect healthy competition. We commit to outperforming our competitors legally and ethically, and observing applicable antitrust and competition laws in the countries in which we operate.

Additionally, the Company does not seek to obtain confidential information from our competitors, either directly, through third parties, or from current ByteDance employees who may have worked at other companies.

## 4.6 Financial Integrity and Record Keeping

Financial integrity and record keeping are essential to the healthy operations of the Company. We make business decisions based on accurate, clear and complete records. We also maintain compliance with financial reporting regulations to uphold credibility with our customers and stakeholders, and demonstrate success as a company. We strive to:

- ensure that our financial statements are always complete and accurate;
- follow relevant accounting and reporting standards and policies; and
- comply with applicable laws, regulations and policies regarding record keeping and record retention.

It is important that we manage and keep records in accordance with applicable record retention policies and legal holds as failures to do so could expose both the Company and you to civil and criminal liability.

## 4.7 Insider Trading

In each of our roles, we may have access to material non-public information about the Company,

as well as our clients or Business Partners. “Insider information” is non-public information that a reasonable investor would consider important in conducting a trade.

The Company considers transactions of stock in a company while in possession of insider information about that company obtained in connection with your employment at ByteDance as insider trading and this is strictly prohibited. Additionally, insider trading includes passing along insider information to another person who then utilizes that information, and would be strictly prohibited. Insider trading is not only against policy, but is also illegal and may lead to legal consequences.

## 4.8 Corporate Social Responsibility & Sustainability

We understand that as members of a global company we have a positive role to play in the community, and to consider the social and environmental impact of business decisions. The Company prohibits child labor, forced or involuntary labor, illegal employment, or trafficking of persons within our organization or supply chain.

We encourage active participation in public welfare activities, promoting social causes and becoming part of the solution. We believe that a strong corporate culture is one where we not only focus on our development needs, but also how we can grow with and help build up our communities.

We seek to improve the sustainability of our operations and look to find ways to lessen our carbon footprint and support environmental initiatives. We do this by complying with applicable environmental laws and recognize our responsibility and commitment to minimize our direct and indirect impact on natural resources through our business practices. We believe that each of us has the opportunity and responsibility to address climate change and biodiversity protection.

If you have any questions concerning the Code, please contact Ethics Oncall.

If you see something that does not seem right, please report it through the [Speak Up Hotline](#), or mail the Ethics Office ([ethics@bytedance.com](mailto:ethics@bytedance.com)) to speak up.