Snap Inc.

Guide to Kind Business

Snap's Global Code of Conduct

A Letter from Evan

People don't usually think about kindness as a part of business strategy. For Snap, it's central to how we grow our business and work as a team to serve our community and partners.

At Snap, being kind is one of our core values. We don't disrupt things first and fix them later; we bring care and long-term thinking into how we solve problems from the start. That's why we designed our technology around humans, trying to give our online community a way to express their full experience with friends and foster real connection. We bring the same empathy and insight to our other business stakeholders: our team, our partners, our investors, and the broader world.

When our stakeholders thrive, so do we. That's why this Code of Conduct is built around that core value. Our standard for good business conduct is not just following the law; it's also treating our stakeholders the right way. Kindness is not a constraint on our growth; it's a driver.

To run a kind business, we need to start with ourselves. That's why we invest heavily in building diverse and inclusive teams and supporting mental health. When we respect and value everyone's humanity, we can work more effectively, innovate faster, and make better decisions together. I hope that this Code helps our team members and other stakeholders understand how empathy informs every aspect of our business and inspires them to lead from their heart.

Evan Spiegel,
CEO, Snap Inc.

**Guide to
Kind Business**

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Here at Snap, we contribute
to human progress by empowering
people to express themselves,
live in the moment, learn about
the world, and have fun together.

This Code also includes Related Policies relevant to each section. Such policies are not hereby incorporated by reference into this Code.

About The Code

**Guide to
Kind Business**

Living the Code means acting with courage and empathy, and in a way that instills trust, even when the rules aren't clear.

Snap Inc.

On Being Kind

Being kind is one of Snap's core values and our business superpower. By being kind, we don't just mean being nice. We mean acting with courage, using empathy, and instilling trust with our stakeholders.

Why is kindness a superpower? Because success that comes at the expense of others is short-lived. Lasting growth comes from building enduring relationships with our five stakeholders: our team members, the community that uses our products, our partners, our investors, and society at large. When we take care of our stakeholders, they help us succeed.

Being kind also helps us remember that business is not just a means to an end. When we conduct business with kindness, we bring our humanity to work and make decisions from both heart and head.

To be kind, we must comply with the law and our policies — and we must go beyond mere compliance and invest in the health of our stakeholders. It's not enough to avoid misconduct; we must act as a responsible corporate citizen in all we do.

This Code helps show us how.

How to Use this Code to Make Kind Decisions

This Code provides clear guidelines, and you should read and follow them. But making kind decisions is not just about knowing all the rules. You will inevitably face situations where the way forward is unclear. In those situations, the three behaviors from the kind pillar of Snap's Values in Action can guide you.
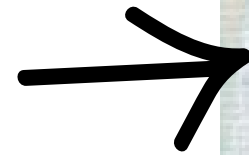
Courage

Have the courage to speak and hear the truth.

It's not always easy to speak up and share the truth. But we need to trust our gut, ask the tough questions, and listen without defensiveness. These courageous conversations are how we work together to protect Snap and our stakeholders.

Empathy

Understand the impact of your decisions on our stakeholders.

Empathy is the heart and soul of being kind. When we can see the world from others' points of view, we are better able to eliminate bias, understand the consequences of our actions, and avoid decisions based on narrow self-interest.

Trust

Choose the path that instills trust with our stakeholders.

Trust holds our business together. That's why we measure our success by the strength of our relationships. We strengthen those relationships by acting with honesty, integrity, and transparency. By contrast, we weaken those relationships when we do things that appear improper, even if they're not. How can you tell if your actions appear improper and weaken trust? Ask yourself if you would want them reported on the front page of a newspaper. If the answer is no, they likely don't meet the standards of this Code.

Being Kind Is a Shared Responsibility

So who has the responsibility to be kind? Everyone who works for Snap, from team members to interns to officers and directors. This Code may also apply to individuals and entities working on our behalf, like suppliers, contractors, consultants, agents, and other partners. It's part of our jobs to know how to make good decisions that reflect courage, empathy, and trust, and follow the principles in this Code.

The Role of Our Leaders

If you're a manager or leader, you play a key role in upholding this Code. That role doesn't begin when a problem arises. Rather, it starts each day with small actions that establish safety, empathy, and trust. It's about talking about ethics and the importance of how we do things. It's about holding third-parties your team works with accountable to Snap's Code. It's about how you make tough decisions or respond to bad news. It's about celebrating how someone does a job, not just the end result. It's about making sure everyone's voice is heard. These small daily acts create space for your team to feel safe raising concerns about more serious issues.

Being kind begins with you.

How to Be a Kind Leader:

- Discuss the Code with your team and emphasize the importance of doing business in a way that earns the trust of our stakeholders.

- Model kind decision-making by using courage, empathy, and trust to assess whether a decision is a good one.

- Create an environment of psychological safety by encouraging team members to voice concerns and opinions, even if they're different than yours.

- Practice receiving feedback with an open mind.

- Ensure everyone has an opportunity to participate and be heard.

- Practice being vulnerable and self-aware by sharing your own mistakes and learnings with your team.

- Foster a culture of inclusion by demonstrating that you welcome and value different perspectives and styles, especially those that are different from your own.

What to Do When Someone Raises a Concern:

• Let the team member know that you are paying attention and that you want to hear what they have to say. Remove distractions.

• Remember that the team member might feel nervous.

• Listen without trying to decide if the team member is right. Instead, focus on trying to understand their point of view.

• Make sure that the team member feels you received the message. It helps to repeat back what you heard.

• Thank the team member for raising the issue.

• If the team member approached you in private, respect their confidentiality to the extent possible and only share the conversation with others as necessary.

• Decide whether this is an issue you can handle on your own or whether you should loop in your manager, Integrity & Compliance, or your HR Business Partner. The Raising a Concern Snappy page and Team Handbook provide guidance, but a good rule of thumb is to get help for anything beyond an interpersonal dispute.

• Follow up with the team member with information about the steps you will take and set expectations as to what will happen next.

Directors, officers, and Integrity & Compliance executives bear special responsibility for following this Code. In the event of an alleged violation by any of those individuals, the General Counsel (or the CEO, if the General Counsel is implicated) will be informed and will ensure an appropriate investigation and appropriate discipline for any violation.

Snap Inc.

How to Raise a Concern

So what if you're the person who spots something that seems off?

What's the best way to share your concern?

Hopefully, your team leader has done a great job of making you feel safe raising concerns openly and honestly with them. There are also plenty of other options, such as your HR Business Partner or Generalist, Employee Relations, Integrity & Compliance, Global Security or Snap's anonymous helpline (See sidebar for more details). Whichever path you choose, we have your trust top of mind. We maintain confidentiality to the extent possible and limit sharing any information and our findings to those with a business need to know.

When you speak up, the company has your back. Snap's Whistleblower Policy makes it clear that we don't tolerate retaliation of any kind for concerns raised in good faith. We also don't tolerate retaliation for refusing to do something that violates this Code, the law, or Snap's policies, or for cooperating with an investigation. Anyone who violates Snap's Whistleblower Policy and does retaliate against a team member on those grounds faces disciplinary action, up to and including termination.

Together we can make Snap a kinder place and a stronger community.

The Helpline

In situations where you prefer to place an anonymous report, you can use Snap's helpline, hosted by a third-party provider and available 24/7. We welcome reports from internal or external stakeholders regarding any issues relating to Snap's business. You can file your report online or by phone. Please note that Snapchat user or account reports should be directed to Snapchat Support and will not be addressed through the helpline.

What Happens When You Raise a Concern

When you raise a concern, we make sure to address it. What that will look like depends on the specific issue at hand. But we always seek fair outcomes that respect the dignity of all involved while also demonstrating our strong commitment to the values and principles in this Code.

When appropriate, relevant in-house teams will dig deeper and gather more facts to evaluate the concern. These teams are trained to gather facts in a fair and impartial way, without making any assumptions. In some cases, the company's Audit Committee of the Board of Directors may conduct an independent investigation. We all have a responsibility to fully cooperate with these teams and Committees with honesty and integrity, and without withholding or mischaracterizing information.

Once an investigation is complete, the team in charge determines whether it is likely that the alleged conduct occurred and whether it violated this Code or any of our other policies.

What happens next depends on the nature of the conduct. Sometimes the best, fairest outcome may be providing some coaching and a listening ear. Other times it will mean disciplining those who have violated Snap's policies. That discipline can range from written warnings to separation from the company. We also may recommend other appropriate corrective action, such as revisiting or enhancing Snap's policies to prevent the problem from recurring. If we learn a business counterparty violated the law or any Snap rules that they agreed to follow, we may end our contract with that counterparty.

For more information, go to the Raise a Concern page on Snappy!

The Code in Action

Our Mission

Snapchat is an app that empowers people to express themselves, live in the moment, learn about the world, and have fun together. It's the easiest and fastest way to communicate the full range of human emotions with your friends without pressure to be popular, pretty, or perfect.

Snap's camera supports real friendships through visual communication, self expression and storytelling. Moving forward, our camera will play a transformative role in how people experience the world around them, combining what they see in the real world, with all that's available to them in the digital world.

So what does being kind look like in action?

It comes alive through our five stakeholder relationships.

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Kind Business**

About The Code

The Code In Action

Be Kind to
Each Other

If we want to practice kindness in the world, we need to practice it at Snap. As team members, we are one of Snap's most vital resources, and we should treat one another that way. When we feel safe, healthy, and respected, we can make good decisions together for Snap and our stakeholders.

TOPICS COVERED:

Create a Safe and Healthy Workplace ⟩

Foster an Inclusive Culture ⟩

Avoid Conflicts of Interest ⟩

Create a Safe and Healthy Workplace

We are committed to creating a workplace where we all feel emotionally, physically, and mentally safe and healthy. Without that foundation, it is very difficult to be kind. When we do have a safe and healthy workplace, we are more likely to be empathetic and caring towards others.
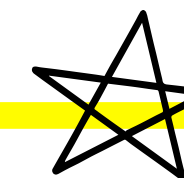
How We Are Kind

- We strive to create a workplace that actively promotes mental, physical, and emotional wellbeing.

- We comply with workplace health and safety laws.

- We have zero tolerance for discrimination, harassment, or retaliation.

- We do not tolerate workplace violence in any form, including violent acts, threats of violence, or verbal or emotional abuse.

- We protect team members' personal and confidential information.

- We don't work under the influence of illicit drugs or alcohol.

- We follow the company's security guidelines (relating to visitors and badges, for example) to keep Snap safe.

- We speak and listen from the heart. We consider how our words will land for the person/group we are speaking to, and we listen deeply and without judgment.

Snap Inc.

Foster an
Inclusive Culture

We need everyone's voice to be heard and valued
if we're going to make the best decisions together.
For more information on Snap's equity and inclusion
efforts, check out diversity.snap.com.

How We Are Kind

- We invest in Employee Resource Groups (ERGs) across
the world to build a shared sense of belonging within
and across our diverse communities.

- We invite our team members to share stories in our
listening practice, Council to foster empathy and
build allyship.

- We provide market leading benefits to support a variety
of lifestyles and life events, including therapy sessions,
financial planning and caregiver support.

- We work hard to create a safe and inclusive workplace free
from discrimination and harassment on the basis of race,
ethnicity, color, national origin, ancestry, creed, religion
or religious creed, sex, gender, sexual orientation, gender
expression, marital status or civil partnership/union status,
age, military or veteran status, physical or mental disability,
genetic information, protected medical leaves, or any
other basis protected by applicable laws. And we are
committed to finding fair solutions for team members who
need reasonable workplace accommodations for medical,
lactation, or religious reasons.

Avoid Conflicts of Interest

We are a community of kind, smart, and creative people with a wide range of outside interests. It's our job to manage those outside interests responsibly and with respect for our commitment to the company. That means we avoid situations where what's best for us personally conflicts with what's best for Snap. When we all put Snap first, we build trust and honor the work and efforts of our colleagues. By contrast, when we introduce conflicts of interest, we undermine trust and we put each other in uncomfortable positions.

How We Are Kind

- We put Snap's interests first.

- We avoid situations where our outside interests, relationships, or activities prevent us from making good decisions for Snap, or give the appearance that we are unable to carry out our jobs effectively. We never take Snap's business opportunities for our own personal gain.

- We avoid situations where our outside interests put pressure on our colleagues to make decisions that aren't in Snap's best interests.

- We disclose any outside employment and qualifying projects, relationships, investments, and potential Snap corporate or business opportunities through Snap's Conflicts of Interest disclosure tool, making sure to also inform our manager.

- We avoid accepting any gifts or courtesies — whether from third parties or Snap team members — that prevent us from making neutral decisions in Snap's best interests, and we follow Snap's Gifts, Meals, Entertainment, & Third Party Travel Policy.

- We respect and follow Snap's policies regarding our outside activities and the responses the company provides when we disclose them. We recognize that in some cases that may mean stopping those activities altogether if we wish to stay employed at Snap.

Be Kind to

Our Community

Since the beginning, Snap has been about empowering people to express themselves, live in the moment, learn about the world, and have fun together.

Hundreds of millions of people have chosen Snapchat as their home to share moments with their friends, family, and in some cases, the world, or use other Snap products like Spectacles to express themselves.

With this privilege comes major responsibilities. Each one of us is responsible for treating our community with empathy and respect, making decisions that increase that community's trust and well-being.

TOPICS COVERED:

Protect Our Community's Privacy ›

Protect Our Community's Well-Being ›

Protect Our Community's Privacy

One of the key ways we respect our community is by protecting their privacy. Their data — the information they share with each other and with us — includes some of the most important information about their lives. Always, always hold that trust in high regard.
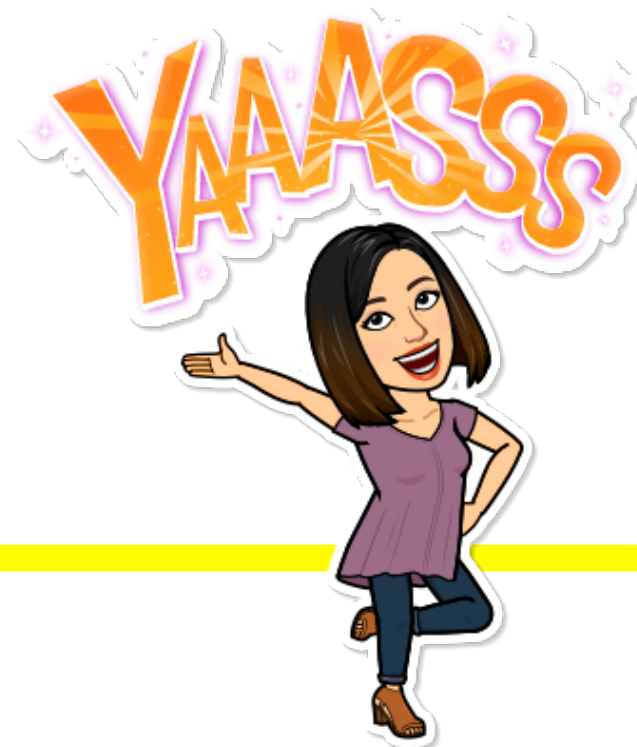
How We Are Kind

- We follow privacy and data protection laws. We pay careful attention to the company's required privacy trainings, and complete them in a timely manner.

- We implement privacy-by-design product development processes, which requires privacy reviews before launching a relevant feature.

- We ensure open and honest communication about how we handle user data.

- We are meticulous in handling user data while doing our jobs. We access user data only if we have been explicitly granted access rights as part of our job and only if we need to do so to perform our job function, and we always respect those users privacy and product settings. Violations of this rule will be taken extremely seriously and will carry consequences up to and including termination.

- When we are unsure about the rules to follow or principles to strive for, we contact the Privacy Legal team, and when we see or suspect potential data privacy incidents, we report them promptly.

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Protect Our Community's Well-Being

Just as our success depends on the physical and mental health of our team members, it also depends on the safety and health of our online community. We are committed to safeguarding that well-being through our products and services. For more information, check out the Snap Safety Center.

How We Are Kind

- We are a design-led company, dedicated to creating products that align with our mission and values.

- We practice responsible growth by measuring our products' success by the value delivered to the user, rather than just seeking to grow engagement.

- We prioritize the online health and wellbeing of our users by implementing safety-by-design principles. We take into account the unique sensitivities of minors while designing our products and we provide our community with easy-to-access wellness resources.

- We commit to platform integrity, including removing content that violates our policies, such as drug activity and child sexual exploitation.

- We seek to communicate our policies clearly and enforce them consistently.

- We seek to eliminate bias in our products.

- We share our concerns if we think a product or feature isn't serving our users well or meeting their needs. Our ability to keep making amazing products with integrity relies on our team's creativity and vigilance.

Snap Inc.

Be Kind to

Our Partners

Snap doesn't do it alone. Our business depends on various partners — such as advertisers, developers, suppliers, partners, and creators — all of whom trust us to operate a reputable business and take their interests into account when making decisions.

TOPICS COVERED:

Don't Bribe >

Be Responsible with Business Entertainment, Gifts, & Travel >

Choose Trustworthy Third-Parties >

Comply with Sanctions and Trade Laws >

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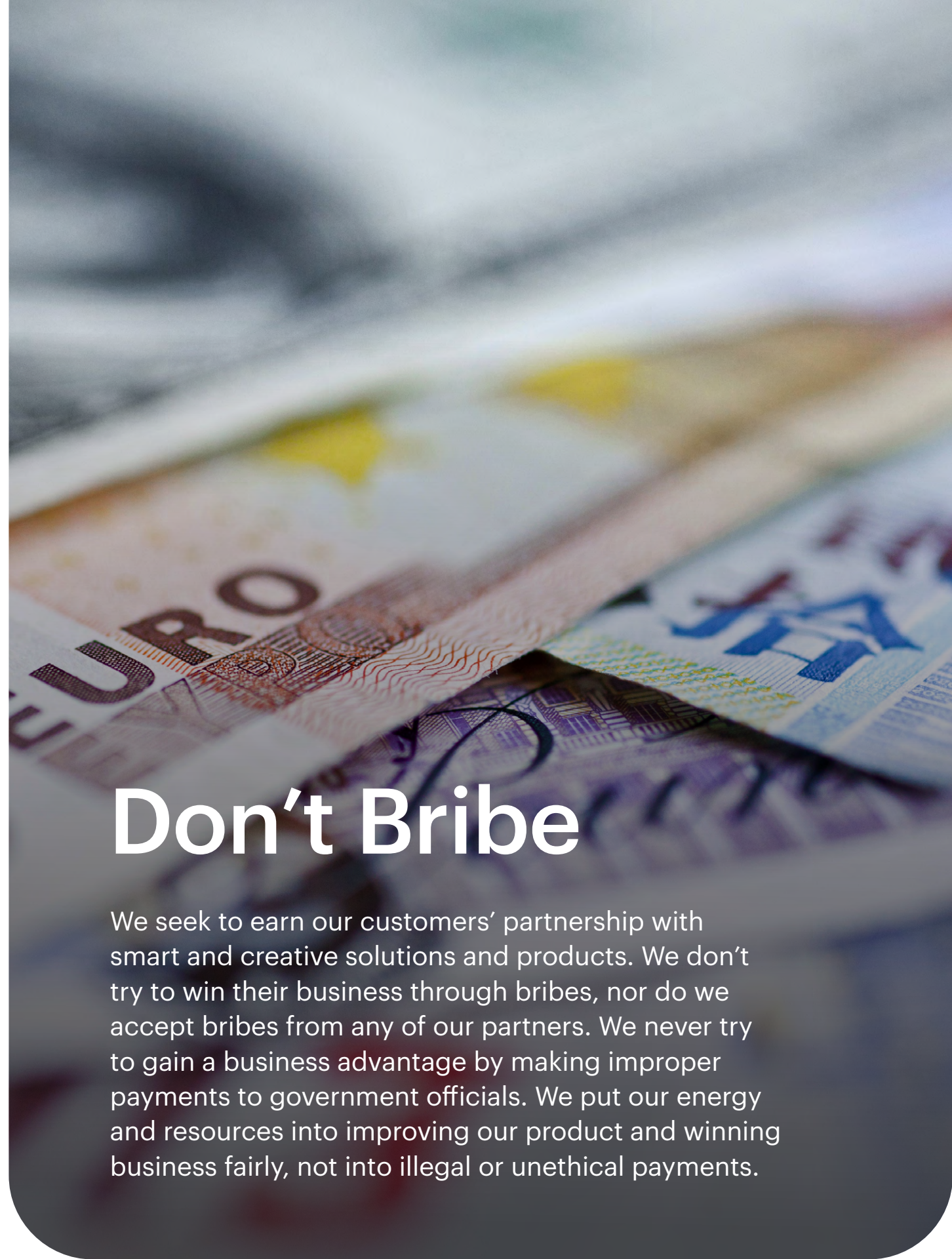
Don't Bribe

We seek to earn our customers' partnership with smart and creative solutions and products. We don't try to win their business t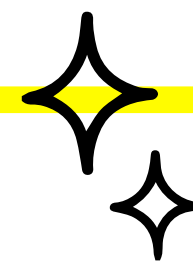hrough bribes, nor do we accept bribes from any of our partners. We never try to gain a business advantage by making improper payments to government officials. We put our energy and resources into improving our product and winning business fairly, not into illegal or unethical payments.

How We Are Kind

- We don't pay or accept bribes or any other improper payments or improper consideration of any kind.

- We understand that bribes can come in many shapes and sizes — not just cash, but gifts, favors, jobs, and more — and we steer clear of them in all their forms.

- We understand that bribery laws are particularly strict when it comes to government officials. We learn the special rules around dealing with government officials and are careful to follow them.

- We only offer and accept reasonable and appropriate gifts, meals, entertainment, and third-party travel to counterparties and get pre-approval when necessary — see the next section for more info.

- We hire candidates based on their merits, choose suppliers that provide fair value to Snap, and make charitable donations only to legitimate charitable causes. We do not engage in any of these activities to improperly benefit a customer or official.

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Be Responsible with Gifts, Meals, Entertainment, & Third-Party Travel

It's a common business practice to build partner relationships through gifts, meals, entertainment, and third-party travel. These practices are fine — so long as we follow Snap's rules and engage in them responsibly. We never give or receive them if there is a promise — or even a suggestion of a promise — of favoritism or action in return.

How We Are Kind

- We make sure that all gifts, meals, entertainment, and third-party travel are reasonable in value, have a business purpose, and follow our Related Policies, disclosing them when required.

- We never make third parties feel like they need to wine and dine us, or provide us any personal benefit to win Snap's business.

- We learn and understand the special rules that apply to government officials. We recognize that in many countries, "government officials" includes employees of state-owned businesses like telcos and universities. We are careful to follow the applicable rules for government officials when we interact with them.

- We accurately record gifts, meals, entertainment, and travel expenses in our expense reports.

- We definitely do not accept or give cash or cash equivalents, such as pre-paid debit cards.

Snap Inc.

Choose Trustworthy Third-Parties

Snap uses third-parties as agents, partners, and suppliers. All of these third parties must reflect Snap's values and commitment to following applicable laws.

How We Are Kind

- We vet all third parties to ensure that they are reputable and can uphold our high standards.

- We ask our key suppliers to abide by Snap's Supplier Code of Conduct, which codifies our expectations for suppliers to ensure safe working conditions, treat workers fairly, employ responsible environmental practices, and meet high standards of ethics. We are members of the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI), and monitor adherence to this Code through RBA's onsite audits and have programs in place to evaluate and address risks related to slavery, forced labor, and human trafficking.

- We choose suppliers of contingent workers who commit to following all relevant employment laws.

- We never ask or suggest that our third parties do anything unethical on our behalf. We work with our sales agents to ensure that they understand our commitment to anti-bribery.

- We comply with anti-tax evasion laws, which prohibit the evasion of taxes and related crimes. We look out for requests from partners to structure transactions in a manner that appears to facilitate tax evasion, such as invoicing using an incorrect address, and we report such requests to Integrity & Compliance.

- We comply with anti-money laundering laws, which prohibit concealing illegally or dishonestly obtained money by hiding it within legitimate economic activities.

- We promptly report any conduct that calls into question a third party's integrity. (See How to Raise a Concern, above, for links to report to our helpline or the Integrity & Compliance team.)

Getting a new representative or supplier approved

Snap follows an onboarding process for vetting all new suppliers before they begin work. To begin the process, visit the Legal Request page on Snappy.

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Comply with Sanctions and Trade Laws

We comply with all relevant trade and sanctions laws not only by following the law ourselves, but by choosing partners in compliance with those laws.

How We Are Kind

- We read and abide by Snap's International Trade Law Policy.

- We vet third parties against sanctions and restricted entity lists as part of our onboarding process.

- We respect guidance from Integrity & Compliance regarding compliance with sanctions or trade laws.

- We seek guidance from Integrity & Compliance before sharing software source code outside the United States or exporting any equipment or hardware.

- We stay vigilant for any illegal boycott requests — requests from partners to confirm we aren't doing business with certain countries — and we immediately report such requests to Integrity & Compliance.

- We use the Snappy Shipping Page if we are going to ship any goods across international borders.

Be Kind to

Our Investors

Our investors trust us by using their resources to back our company. We honor that trust by safeguarding our corporate resources and always operating honestly and fairly.

TOPICS COVERED:

Keep Accurate Records and Contracts 〉

Make Truthful and Accurate Public Statements 〉

Don't Trade on Inside Information 〉

Compete Fairly 〉

Respect Snap's Property 〉

Keep Confidential Information Confidential 〉

Snap Inc.

Keep Accurate Records and Contracts

Our commitment to honesty is reflected in how we keep business records. Those records come in all shapes and sizes, from receipts to contracts to our user engagement metrics and published financials. Whatever the type of record, we apply the same approach: we are truthful, transparent, and accurate in our documentation. That's the kind of company that investors and the public can trust.

How We Are Kind

- We record all business activities accurately and honestly. We do not engage in any activities that would cause those records to be misleading.

- We respect and follow Snap's contracting process. We make sure our contracts accurately portray the agreement and capture all terms of the deal. We don't enter into "side agreements."

- We respect Snap's procurement process and make sure we have the necessary authorization before entering into any agreements or agreeing to any terms on Snap's behalf.

- We always record user engagement metrics, partner metrics, and financial data accurately. We never knowingly falsify, misstate, mischaracterize, or otherwise inaccurately represent those metrics or financials.

- We immediately notify Risk Advisory Partners (RAP) or Integrity & Compliance if we learn of anything that might cause inaccuracies in our public filings or statements.

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Make Truthful and Accurate Public Statements
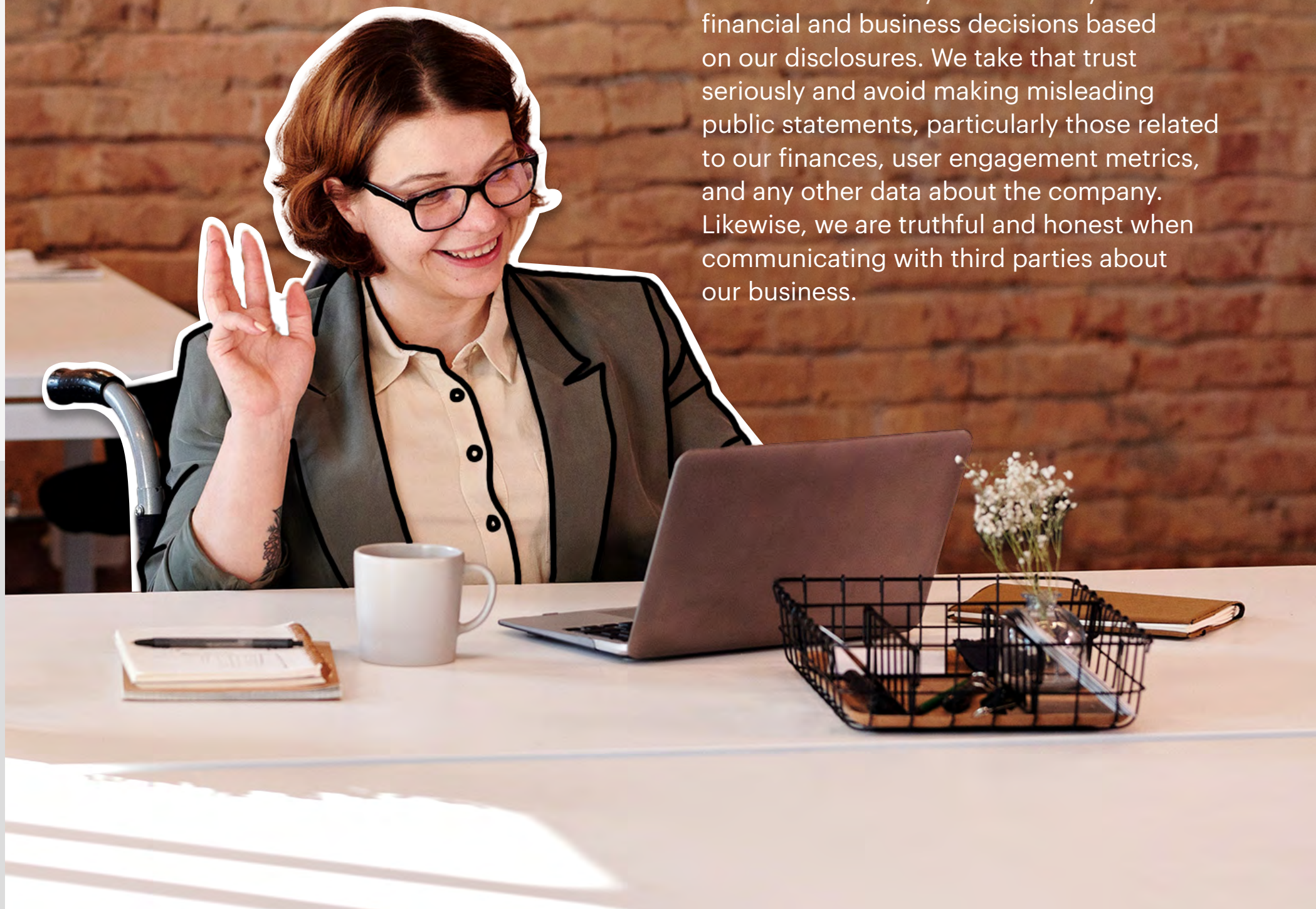
Investors, Customers, and Partners need to trust what we say because they make financial and business decisions based on our disclosures. We take that trust seriously and avoid making misleading public statements, particularly those related to our finances, user engagement metrics, and any other data about the company. Likewise, we are truthful and honest when communicating with third parties about our business.

How We Are Kind

- We prepare complete, timely, and accurate financial reports.

- We understand that only designated spokespeople are authorized to make public statements on Snap's behalf. We direct any press or other public inquiries to our Communications team. Snap team members follow public speaking guidelines and seek approval for appropriate opportunities.

- When we communicate with third parties, we always give honest and accurate information about our business. Our designated spokespeople follow our corporate disclosure rules.

- We do not misstate, mischaracterize, or otherwise inaccurately represent Snap data. We follow the company's data review and approval processes before releasing any data externally. (See Related Policies sidebar links.)

- We ensure any research we publish is truthful and accurate, and does not disclose confidential information.

- We disclose a wider range of issues related to our social impact through our yearly CitizenSnap Report and our Diversity Annual Report.

Snap Inc.

Don't Trade on Inside Information

We respect our outside investors and want them to feel confident investing in our business. That's why we educate our team members to never put investors at a disadvantage by unfairly trading on our inside knowledge of Snap. Insider trading is not only illegal, but also it violates the trust of our investors and the public.

How We Are Kind

- We respect all laws banning insider trading. Under those laws, we instruct our team members not to trade based on "material non-public information" (i.e., information that a reasonable investor doesn't have, but would find important).

- We instruct our team members not to trade during the closed trading windows before our quarterly earnings releases.

- We instruct our team members not to give anyone "tips" about material non-public information or suggest that they make trades based on our inside knowledge.

Compete Fairly

Everyone benefits when there is a competitive marketplace. We protect that interest by competing according to the rules. We get ahead by being kind, smart, and creative, not by engaging in unfair or unethical business practices.

How We Are Kind

- We don't engage in collusion with our competitors. For example, we don't enter into unlawful agreements to do any of the following: set pricing, allocate customers or markets between us and competitors, rigging bids against each other, or exclude industry participants.

- We ensure that any public statements we make about our competitors or the industry are true and not misleading, deceptive, or fraudulent.

- We never take advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair practice.

- We do market research through appropriate and lawful means that are never misleading, and we never rely on confidential information from our competitors.

- We make decisions on hiring and recruiting unilaterally and do not come to agreements with competitors on who we will recruit.

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Respect Snap's Property

We also demonstrate our integrity by respecting Snap's property. That property is meant to benefit our investors and other stakeholders, not us personally. We are responsible and honest when handling and protecting Snap's property, including money, corporate information, physical property and goods, intellectual property, and other belongings.

We also respect the property of individuals, such as team members and suppliers, consistent with our shared commitment to being kind.

How We Are Kind

- We never take Snap's property for our personal benefit.

- We spend Snap's money wisely and use its resources carefully. For example, we make sure that any expenses are reasonable, tied to a business purpose, and compliant with Snap's policies.

- We understand that business communications and data belong to Snap and should only be accessed and reviewed according to our internal policies.

- We respect the intellectual property of our partners and other third parties. For example, we never copy protected materials or otherwise take or use third-party intellectual property — such as code, images, text, or other creative works — without authorization or legal justification.

- We report questions or concerns regarding the protection of Snap's property and/or personal property to Global Security or Integrity & Compliance.

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Keep Confidential Information Confidential

Snap's continuing product leadership relies on our ability to out-innovate our competitors and surprise our community with terrific experiences. That means confidentiality — about our projects, our products, non-public financial metrics, and any other private information — is critical. We treat the confidential information of third parties with the same respect.

How We Are Kind

- We treat all of Snap's non-public information as confidential and we don't disclose it to anyone outside the company without the appropriate authorization. As part of this commitment, we never take Snap's non-public information outside of Snap's IT environment without a valid business reason. We also never expose Snap's non-public information to any AI tool that is not otherwise approved under Snap's Policy on Generative AI Use. We understand that non-public information includes a wide variety of information, such as marketing plans, customer information, financial information, metrics, and internal reports and emails.

- We never hold confidential conversations within earshot of the public or in public places like restaurants — this is one of the reasons why our Food team provides in-office meals. And even inside the office, we only disclose and discuss confidential information on a need-to-know basis.

- We respect the confidentiality of our partners and other third parties, and we never disclose their confidential information without authorization.

- We do not use confidential information of Snap or our partners or other third parties for personal gain.

- We report questions or concerns regarding the protection of confidential information to Global Security or Integrity & Compliance.

Be Kind to
Our World

Snap is only as healthy as the communities, countries, and planet of which it is a part.
To make sure that those systems stay healthy, we must respect local laws and universal rights, and take responsibility for creating positive social impact.

TOPICS COVERED:

Respect Laws >

Protect the Environment >

**Respect and Promote
Human Rights** >

Give Back >

Respect Laws

Our global corporate citizenship begins by respecting the laws of the places where we operate.

How We Are Kind

- We follow all applicable governmental laws, rules, and regulations.

- We pay appropriate tax to the countries and localities where we operate. We view tax not just as a legal obligation but as a way to support those communities. Ensuring that we pay the right amount of tax, at the right time, and in the right place is a critical part of our approach.

- If we are ever confused about what the law requires, or think something we or someone else is doing may be violating the law, we reach out to Integrity & Compliance for guidance.

- We have a zero tolerance approach to the facilitation of tax evasion by Snap, our team members, or anyone acting on our behalf. Any concerns regarding potential tax evasion should be reported immediately.

Protect the Environment

We are a citizen not only of the countries where we operate, but also the planet on which we all live. It is part of our responsibility to operate our business in a way that respects the environment.

How We Are Kind

- We take action to reduce the carbon emissions of our products and operations.

- We educate ourselves about sustainability and environmental impact so that we can make informed choices, such as minimizing waste and recycling.

- We incorporate sustainability into the design, construction, and ongoing occupancy of our spaces and kitchens.

- We provide food that is healthy and produced using practices that respect farmers, workers, animals, and the land.

Respect and Promote Human Rights

Snap believes that all companies should respect people's core human rights, such as the inherent rights to privacy, fair labor, and an adequate standard of living. This is something that we ask of our suppliers; we must make sure that our own products and operations also reflect this fundamental commitment.

How We Are Kind

- We seek to operate according to the expectations set out in the United Nations' Guiding Principles on Business and Human Rights and are members of the Responsible Business Alliance (RBA). We address any adverse human rights impacts with which we are involved.

- We empower people to express themselves through our products and in our workforce.

- We pay a living wage.

- We protect user privacy.

- We ensure an ethical supply chain.

- We strive to give all team members the opportunity to succeed at Snap regardless of their identity.

Snap Inc.

Snap Inc.

Give Back

At the end of the day, being kind is about recognizing the positive difference we can make in people's lives when we approach each other with empathy. By leveraging both Snap's resources and our team members' time and talents, we are able to maximize our capacity to make a meaningful impact.

How We Are Kind

- We promote the well-being of the neighborhoods where we work through volunteerism.

- We support nonprofits that align with our philanthropic priorities and mission.

- We get approval from our Philanthropy & Finance teams before donating any funds or resources on behalf of Snap to charitable causes or tax-exempt organizations related to Snap or our business. We never present ourselves as Snap's representative when privately contributing to charitable causes.

- We make sure to avoid any appearance of impropriety in our charitable activities and corporate sponsorships.

- We never pressure others, such as co-workers or suppliers, to contribute to charitable organizations or other community causes.

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Violations, Waivers, & Modifications

Violations of this Code may result in disciplinary action up to and including termination of employment, at the sole discretion of the Company or Board.

The Board of Directors or a delegated board committee must approve:

- Any substantive modification of this Code

- Waivers of any part of this Code for Executive Officers or members of the Board of Directors. All such waivers must be publicly disclosed by publication on the Snap website or by filing a current report on SEC Form 8-K pursuant to applicable SEC and stock exchange rules.

Snap Inc.

Latest version approved by the Board February 2025.

Questions or concerns? We're here to help!

You can get in touch with Snap Integrity & Compliance in a variety of ways:

MAIL:

Snap Integrity & Compliance
2772 Donald Douglas Loop North,
Santa Monica, California 90405

ANONYMOUS HELPLINE:

Available at www.snaphelpline.com or by phone at 1-800-461-9330.

International phone numbers available at www.snaphelpline.com.

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