

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.





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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





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Living the Code means acting with courage and empathy, and in a way that **instills trust,** guided by our values, our policies, and a willingness to seek guidance when needed.



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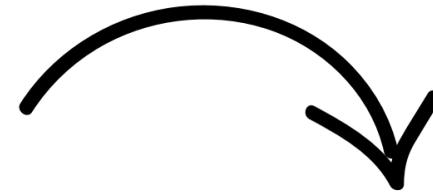
Be Kind to Our World

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.





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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.



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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 and setting the tone for your team. Your everyday choices, the questions you ask, the tradeoffs you make, and the way you treat people, help shape and reinforce a culture of courage, empathy, and trust. Talk openly about ethics and how we make decisions, not just the end result. Hold your teams and third parties to Snap's standards. Listen, take steps to ensure all voices are heard, make space for honest feedback and celebrate integrity in action. Your example builds an environment where people feel safe speaking up and doing the right thing.

Being kind begins with you.

How to Be a Kind Leader:

- Talk with your team about what the Code means in day-to-day work — emphasize earning and keeping the trust of our stakeholders.
- Model kind decision-making by using courage, empathy, and trust to assess whether a decision is a good one.
- Encourage team members to share concerns and opinions, even when they are different from your own.
- Receive feedback with an open mind.
- Practice being vulnerable and self-aware by sharing your own mistakes and learnings with your team.
- Welcome and value perspectives, styles, and backgrounds that differ from your own.



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What to Do When Someone Raises a Concern:

- Give the person your full attention and remove distractions.
- Recognize that speaking up can be intimidating — thank them for doing it.
- Listen without trying to decide if the team member is right. Instead, focus on trying to understand their point of view.
- Reflect back what you heard so the team member knows you understand.
- Respect confidentiality to the extent possible and only share information with those who need to know.
- Follow up with the team member with information about the steps you will take and set expectations as to what will happen next.

Your Obligation to Report:

- Managers have a duty to report potential misconduct. This includes any concern or complaint involving harassment, discrimination, retaliation, policy violations, or other conduct that may violate the Code, Snap policies, or the law.
- Don't investigate or try to resolve complex issues yourself. Instead, immediately involve Integrity & Compliance, your HR Partner, or your own manager. Refer to the Raising a Concern Snappy page and Team Handbook for guidance.



Directors, officers, senior financial 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 help ensure an appropriate investigation and appropriate discipline for any violation.



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Related Policies

[Whistleblower Policy](#)

Related Policies are not hereby incorporated by reference into this Code.

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 of employment.

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

RAISE YOUR VOICE



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.



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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 termination of employment. 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





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So what does being kind look like in action?

**It comes alive through our
five stakeholder relationships.**



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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 and Disclose Conflicts of Interest >





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Related Policies

- [Global Team Privacy Notice](#)
- [Team Handbook](#)
- [Workplace Violence Prevention Policy](#)



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 well-being.
- 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 (e.g. Guest Policy, displaying employee badges, keeping a clean desk and reporting suspicious activity) to keep Snap safe.
- We speak and listen from the heart. We consider how our words may impact the individual(s) we are speaking with, and we listen deeply and without judgment.



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Related Policies

[Team Handbook](#)

Foster an Inclusive Culture

We need everyone's voice to be heard and valued if we're going to make the best decisions together.



How We Are Kind

- We invest in Employee Resource Groups (ERGs) across the world which welcome all employees to participate, 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.

For more information on how Snap fosters a culture of belonging, merit and innovation, check out belonging.snap.com.



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Related Policies

- [Conflict of Interest Policy](#)
- [Gifts, Meals, Entertainment, & Third Party Travel Policy](#)

Avoid and Disclose 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 giving or 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. We follow Snap's Gifts, Meals, Entertainment, & Third Party Travel Policy, we avoid purchasing extravagant gifts and we understand that cash or cash equivalents (like gift cards) are not allowed.
- 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.





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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.

As a result, 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 >](#)





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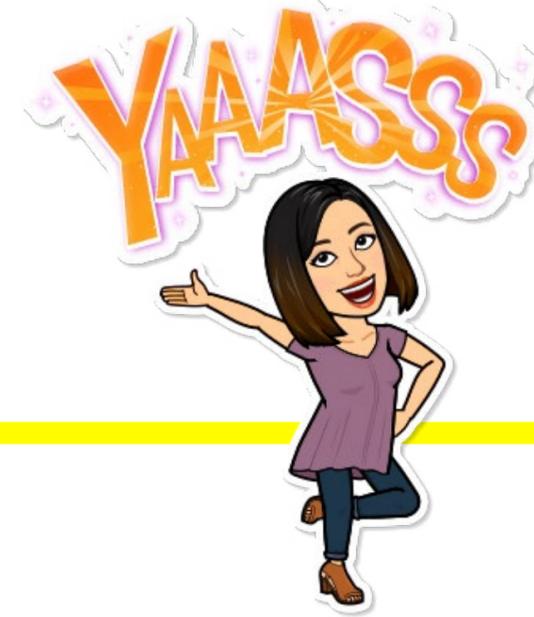
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Related Policies

- [Snap Access to Personal Data Policy](#)
- [Policy on Generative AI Use](#)

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 of employment.
- We have strict rules on when and how user data can be used with AI tools and we always follow Snap's Policy on Generative AI Use.
- 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.



For more information, check out the [Snap Privacy Center](#).



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Related Policies

[Community Guidelines](#)

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 well-being 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. This is supported by our internal policies setting out the safety principles and requirements we have for our staff and suppliers to protect users from illegal and harmful content.
- 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.



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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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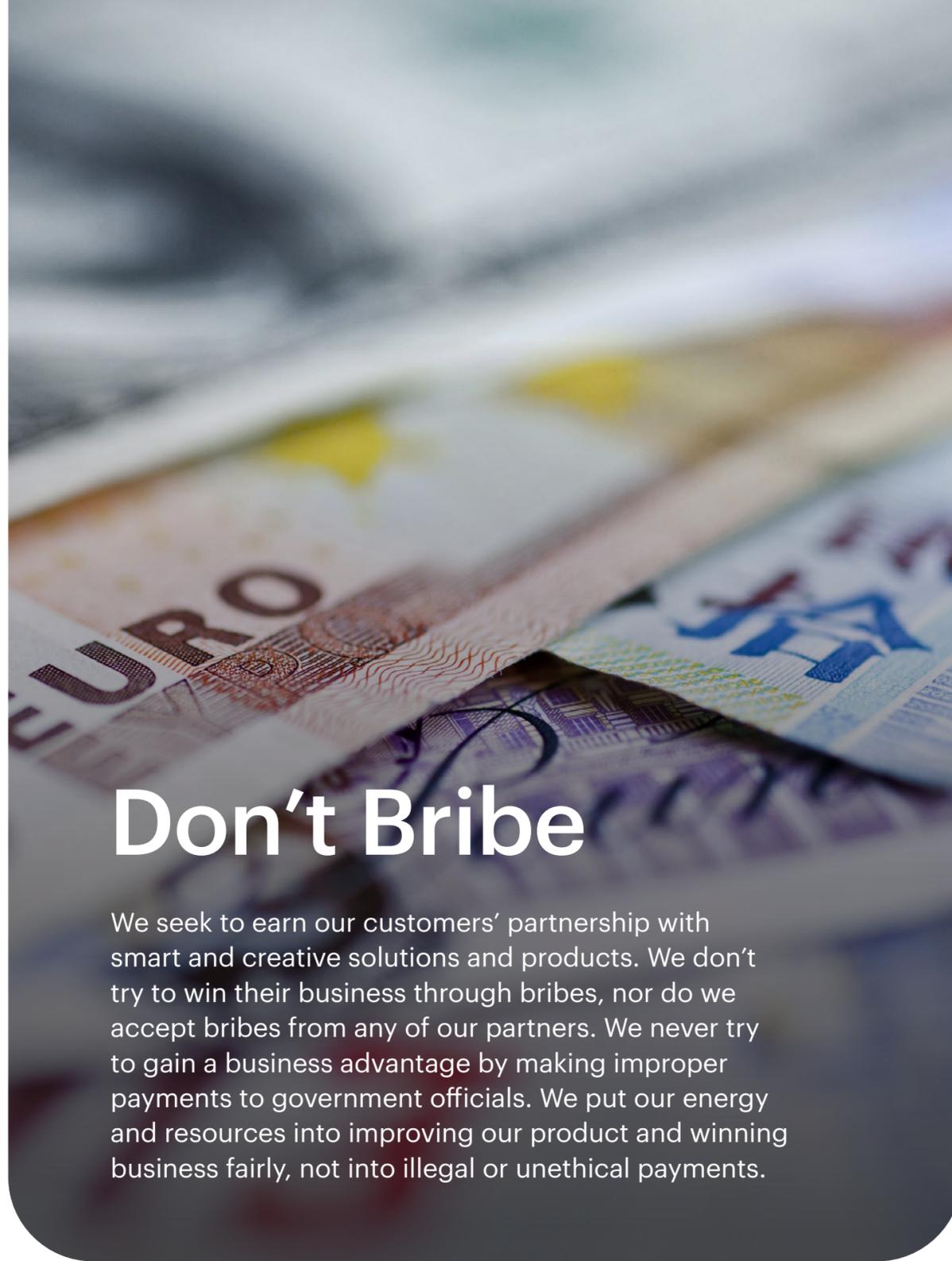
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Related Policies

- [Gifts, Meals, Entertainment, & Third Party Travel Policy](#)
- [Policy Prohibiting Bribery and Corruption](#)
- [Political Contributions and Charitable Donations Policy](#)
- [Sales Code of Conduct](#)
- [Ticket Allocation and Suite Use Policy](#)



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 through 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 there are special rules around dealing with government officials and are careful to follow them.
- We only offer and accept gifts, meals, entertainment, or third-party travel that are reasonable and appropriate, and we seek pre-approval when necessary.
- We hire candidates based on their merits, choose suppliers that provide fair value to Snap, and make charitable donations only to vetted causes that align with our values. We do not engage in any of these activities to improperly benefit a customer or government official.



GOOD CALL



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Related Policies

- [Gifts, Meals, Entertainment, & Third Party Travel Policy](#)
- [Sales Code of Conduct](#)
- [Travel & Expense Policy](#)

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 legitimate business purpose, are provided transparently and consistent with local laws, 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 and other accounting records.
- We definitely do not accept or give cash or cash equivalents, such as prepaid debit cards.



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Related Policies

- [Policy Prohibiting Bribery and Corruption](#)
- [Purchasing and Contracting Policy](#)
- [Supplier Code of Conduct](#)

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 assess 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 help 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 we 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 help them understand our commitment to anti-bribery principles and ethical conduct.
- 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 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 new suppliers and other third parties before they begin work. To begin the process, visit the Legal Request page on Snappy.



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Related Policies

[International Trade Law Policy](#)

Comply with Sanctions and Trade Laws

We comply with all relevant sanctions and trade 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 parties 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 encrypted source code outside the United States.
- 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 reference the Snappy Shipping Page and seek guidance from Integrity & Compliance if we are exporting any equipment, goods, or hardware.



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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 >





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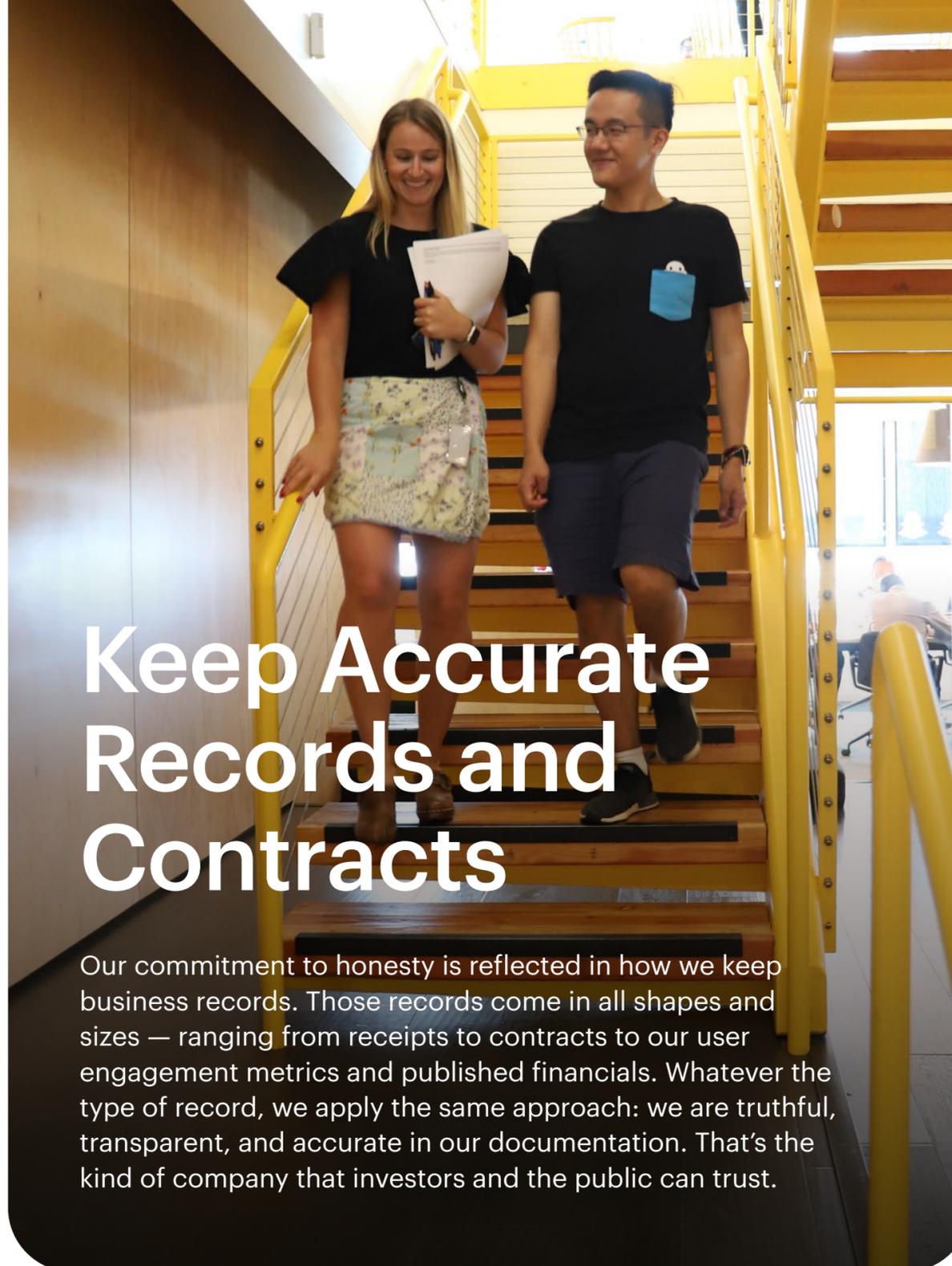
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Related Policies

- [Document Retention and Acceptable Communication Tools Policy](#)
- [Non-Financial Reporting Policy](#)
- [Policy on Snap Data](#)
- [Purchasing and Contracting Policy](#)
- [Revenue Contract Policy](#)
- [Sales Code of Conduct](#)
- [Snap Access to Personal Data Policy](#)
- [Snap Data Deletion and Retention Policy](#)

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 — ranging 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 and signatures before entering into any agreements or agreeing to any terms on Snap’s behalf.
- We record all metrics accurately, including user engagement metrics, partner metrics, and financial data. 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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Related Policies

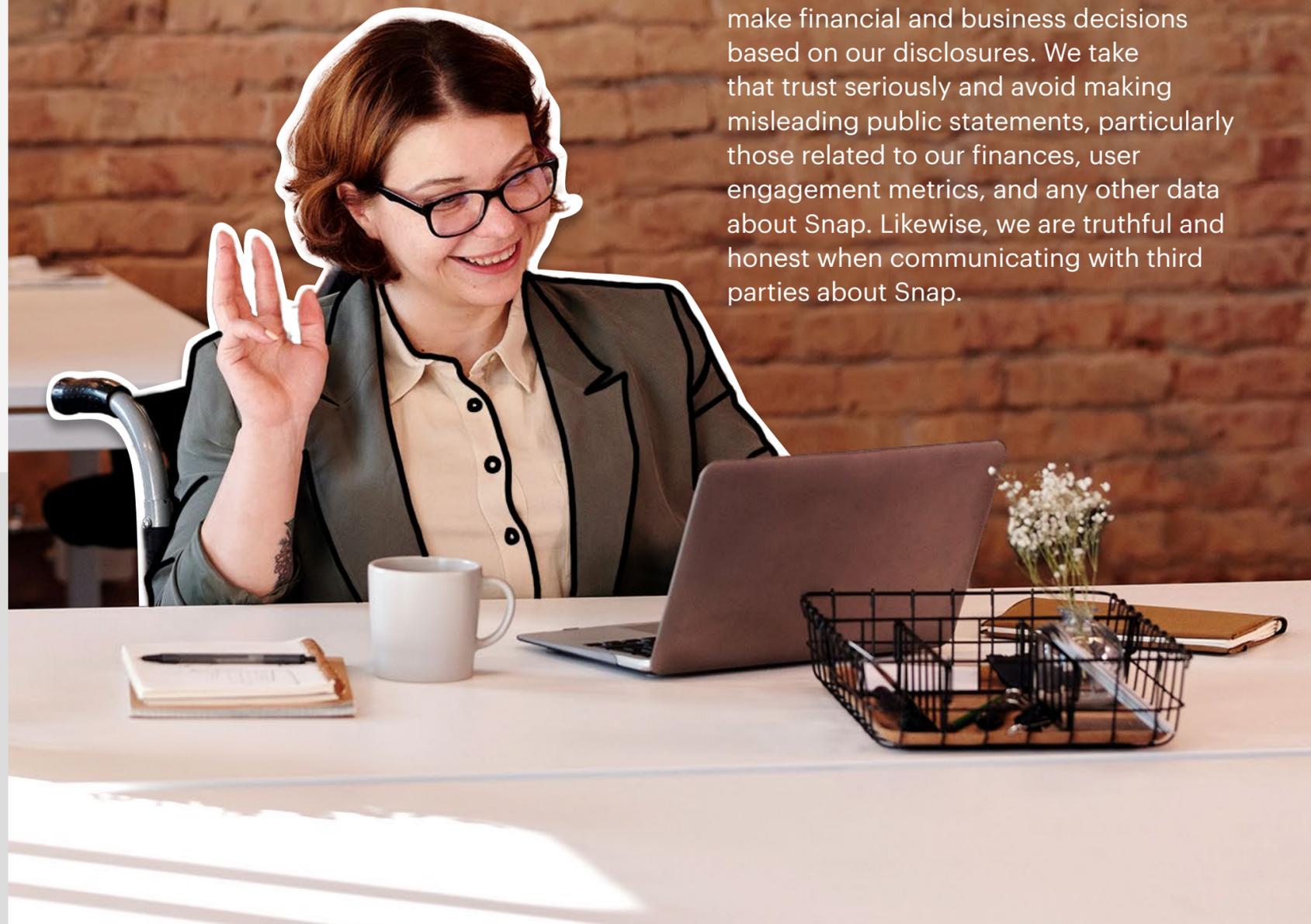
[Corporate Disclosure Policy](#)

[Employee Communications Guide](#)

[Intra-Quarter Public Statements Policy](#)

[Policy on Snap Data](#)

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 Snap. Likewise, we are truthful and honest when communicating with third parties about Snap.



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. Our designated spokespeople follow our corporate disclosure rules. Snap team members follow public speaking guidelines and seek approval for appropriate opportunities.
- When communicating with third parties, we provide honest, accurate information about our business, including being transparent about Snap's services with our advertising clients and marketing partners.
- We do not misstate, mischaracterize, or otherwise inaccurately represent Snap data. We follow Snap's data review and approval processes before releasing any data externally. (See Related Policies sidebar links.)
- We take steps to confirm any research we publish is truthful and accurate, and does not disclose confidential information.
- We disclose a wide range of information related to our social impact through our yearly Citizen Snap Report and highlighted on our Belonging at Snap site.



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Related Policies

[Insider Trading Policy](#)

[Sales Code of Conduct](#)

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, rig bids against each other, or exclude industry participants.
- We work to 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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Related Policies

[Security & Privacy Policies, and Email Security Policy](#)

[Travel and Expense Policy](#)

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 do not transfer Snap data, documents, or intellectual property to personal accounts, systems, or devices without a documented and approved business exception. This also applies when we depart Snap.
- 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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Related Policies

- [Personnel Cybersecurity Policy](#)
- [Policy on Snap Data](#)
- [Snap Policy on Generative AI Use](#)

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, our clients' confidential information, 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 share Snap's non-public information outside of Snap's IT environment to personal accounts, systems, or devices (e.g, personal email, cloud storage, USB drives, Airdrop) without a valid business reason.
- We 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, sales data, customer information, financial information, metrics, Snap code, 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 understand that violations of Snap's data policies could result in termination of employment, legal action, referral to law enforcement or the notification of new employers.
- We report questions or concerns regarding the protection of confidential information to Global Security or Integrity & Compliance.



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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 >





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Related Policies

- [Citizen Snap Report](#)
- [Global Tax Strategy](#)
- [Political Ad Sales Policy](#)

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.
- We have zero tolerance for fraud or 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. We comply with anti-tax evasion laws and with Section 199 of the UK Economic Crime and Corporate Transparency Act (ECCTA) and the “failure to prevent fraud” offence.*
- If we are ever unsure about legal requirements, or believe that our own or someone else’s actions may violate the law, we contact Integrity & Compliance for guidance.

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.

* We understand that fraud is a form of dishonesty, intended to make a gain or to cause a loss. Common forms include false representation, failing to disclose information, abuse of position, participation in a fraudulent business, obtaining services dishonestly, and false accounting.

• We prohibit all forms of fraud, dishonest acts, and fraudulent misstatements, as well as aiding or abetting such offences. We recognize that if an “associated person” commits a specified fraud offence intending to benefit Snap or its customers, Snap could be held criminally liable. If we identify a suspected offence, we report it (see [How to Raise a Concern](#)).



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Related Policies

- [Supplier Code of Conduct](#)
- [Team Handbook](#)



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 promote an ethical supply chain and are committed to preventing all forms of human trafficking and modern slavery.
- We strive to give all team members the opportunity to succeed at Snap regardless of their identity.



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Related Policies

- [Policy on Political Contributions and Charitable Donations](#)
- [Volunteer Time Off Policy](#)

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 (via philanthropy@snap.com) 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.

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 2026.

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
3000 31st Street
Santa Monica, CA 90405

ANONYMOUS HELPLINE:

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

International phone numbers available at
www.snaphelpline.com.

EMAIL:

Compliance@snap.com