

# ByteDance Business Partner Code of Conduct

## Overview

The Business Partner Code of Conduct ("Code") serves to communicate and specify our ethical and compliance standards to all third parties, including but not limited to suppliers, service providers, agents, vendors and consultants who provide any kind of products or services or undertake any activity for or on behalf of ByteDance ("Business Partner"). This Code forms part of the agreement with our Business Partners and creates audit rights so that ByteDance can confirm the Business Partner's compliance with this Code.

## Introduction

ByteDance is committed to conducting its business in accordance with the highest ethical standards. To this end, we have created this Code for our Business Partners. At ByteDance, we want to develop and maintain business relationship with Business Partners who are committed to upholding the principles of integrity and compliance in their business operations. This Code sets detailed standards and responsibilities for each Business Partner in the areas of ethics, integrity, human rights, labour, environment, health and safety and fair business practices but it is not intended to be all-inclusive or to address every situation. This Code is not intended to replace or change the Business Partner's contractual obligations to ByteDance.

## Applicability

This Code is applicable to all Business Partners. This also includes a Business Partner's employees at all levels, board members, officers, managers, consultants and other third parties who act on behalf of or represent the Business Partner in conducting any activities in connection with ByteDance's business.

## Compliance with Laws

Business Partners shall comply with all applicable laws and regulations of the countries in which they operate or render goods and services. In case of any conflict between this Code and any applicable laws or regulations, the stricter standard applies.

## Fair Business Practices

ByteDance conducts business honestly and ethically and has zero tolerance for unlawful or unethical conduct in any form, including but not limited to corruption, bribery, fraud, extortion, embezzlement, kickbacks or money laundering. To foster transparent and trustworthy business relationships, we expect our Business Partners to follow the same standards.

- **Bribery and Corruption** - Business Partners shall ensure that they do not directly or indirectly through third parties engage in any form of bribery or corruption in relation to ByteDance's business. Business Partners shall abide by the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, all applicable anti-corruption laws and regulations of the countries in which they operate, applicable international anti-corruption conventions, and ByteDance's Global Anti Corruption and Anti Bribery Policy. Business Partners shall not make inappropriate gifts, directly or indirectly through a third party, to employees or representatives of ByteDance, or to any third party on behalf of ByteDance. If Business Partners extend any business courtesies to ByteDance's employees or representatives, it should be infrequent and of low value and permissible under the applicable laws and regulations.
- **Conflict of Interest** - Any situation that creates a real or apparent conflict between the personal interests of a business partner and those of ByteDance or its employees must be avoided by the Business Partner. Business Partners shall promptly disclose to ByteDance any actual or potential conflict of interest between the Business Partner and ByteDance's employees, former employees or representatives or when such conflict arises or is anticipated to arise, and cooperate with ByteDance to take effective measures to avoid or eliminate any possible impact on the existing or proposed commercial relationship between the parties.
- **Financial Integrity and Accounting** - Business Partners must keep accurate books and records of all business dealings with ByteDance. These records must be kept in compliance with applicable standard accounting practices and record retention policies. ByteDance reserves the right to audit the financial records of the Business Partner in connection with its business.
- **Fair Competition** - Business Partners shall comply with all applicable antitrust and anti-unfair competition laws and regulations and promote fair competition and respect competitors in the marketplace. Business Partners shall not enter into any agreements (written or oral) or engage in other forms of activities, which would unlawfully restrict or prohibit competition under applicable laws and regulations.

- **International Trade Compliance** - Business Partners are required to comply with all applicable international trade laws and regulations, including but not limited to, those on import and export control, embargoes, economic sanctions, and anti-boycott. Business Partners shall not engage in business activities or other dealings with sanctioned regions and parties that may lead to violation of any applicable sanctions and export control laws and regulations.
- **Anti-Money Laundering** - Business Partners shall only conduct business with customers who are involved in legitimate business activity and whose funds are derived from legitimate sources, in order to combat money laundering and terrorist financing.
- **Intellectual Property** - Business Partners must take appropriate measures to safeguard and must not infringe intellectual property rights of ByteDance and its creators, including but not limited to trade secrets, know-how, patents, copyrights, trademarks, and source codes, and should immediately inform ByteDance of any potential or existing infringement of such rights.

## Information Security and Data Protection

Business Partners shall treat all non-public information that they get access to during their business dealings with ByteDance as confidential, including but not limited to, ByteDance's business information, intellectual property rights, product strategy, proprietary data, financial status, strategic plans, organizational structure, technical or management rules, negotiation information, user/customer information, employee information, as well as third-party confidential information that ByteDance is under any statutory or contractual obligation not to disclose to the public. Business Partners shall only use confidential information as authorized and for the purpose for which it was provided. Business Partners must comply with applicable privacy and data protections laws and regulations in their respective countries of operation to protect the data of ByteDance and its global users.

## Labour and Human Rights

Business Partners are expected to treat their employees with the utmost dignity and respect and in accordance with the applicable labour and employment laws and regulations as well as the following standards:

- **No Child Labour** - Business Partners must not use child labour and should have procedures in place to verify and ensure that no child labour is employed. "Child" refers to any person below the minimum age for employment under the applicable laws of the country where the work is to be performed. Workers under the age of 18 years shall not perform work which is hazardous in nature.

- **No Forced or Compulsory Labour, Modern Slavery, or Human Trafficking** - Business Partners shall only use voluntary labour, and shall not engage in any form of modern slavery or human trafficking or use any type of forced, bonded, involuntary, or prison labour within their organizations or supply chains. All workers must be able to work freely and leave with reasonable prior notice. Business Partners shall ensure that their management understands such commitment against forced and compulsory labour, modern slavery, and human trafficking, and shall ensure that they provide their employees with access to all rights protected by applicable laws and regulations as well as detailed employment contracts stating terms and conditions of service which are easily understood by them.
- **Diversity, Inclusion, and Non-Discrimination** - Business Partners must be committed to upholding the human rights of its employees and treat them with dignity and respect in settings associated with work. Business Partners shall have fair recruitment, training and promotion policies, and ensure that there is no form of discrimination or any form of harassment (including but not limited to discrimination or harassment on the grounds of race, color, sex, political beliefs, religion, national or ethnic origin, sexual orientation, disability, union membership, or any other characteristics protected by applicable laws and regulations). Business Partners shall also promote diversity and inclusion at its workplace.
- **Freedom of Association and Collective Bargaining** - Business Partners should recognise and respect the right of employees to freely and voluntarily establish and join unions or associations of their choice, without any restrictions or consequences subject to compliance with local laws. Business Partners are also expected to allow their employees to collectively discuss and negotiate with the management their grievances in relations to terms and conditions of work.
- **Wages, Benefits and Working Hours** - Business Partners must ensure that working hours of the employees do not exceed the maximum hours mandated by local laws and regulations where the employees work. The employees must be paid minimum wages and all legally mandated benefits as required by applicable laws and regulations. In addition to payment for regular hours of work, employees must be paid overtime for the extra hours worked by them in compliance with the applicable local laws, and where no such laws exist, at least equal to their regular hourly rate.

## Corporate Social Responsibility

At ByteDance we actively integrate corporate social responsibility into our daily operations and expect our Business Partners to follow the same standards.

- **Platform Operation and Product Safety** - Business Partners must comply with the applicable laws and regulations on platform operation and product safety.

- **Protection of the Environment** - We expect our Business Partners to comply with all applicable environmental laws and regulations. We expect our Business Partners to use natural resources efficiently and responsibly, minimize their environmental impact, and continually monitor their environmental performance.
- **Handling of Hazardous Material and Waste** - We improve business practices to make a positive contribution to our communities. When handling materials and products that are classified as hazardous to the environment, Business Partners must ensure that such materials and products are handled, transported, stored, recycled, and/or disposed of safely. Business Partners producing any kind of waste or emissions are expected to characterize, monitor, control, and treat such waste or emissions prior to discharge or disposal in accordance with applicable laws and regulations.

## Health and Safety

Business Partners shall commit to creating a safe and healthy work environment for all of their employees and strive for operational health and safety for continuous improvement of work conditions.

- **Safe Working Environment** - Business Partners shall ensure that employees are provided with a healthy and safe working environment in accordance with applicable laws and regulations as well as internationally recognized standards. Business Partners shall do their utmost to control hazards and take necessary precautionary measures against accidents and occupational risks.
- **Health and Safety Communication** - Business Partners shall ensure that employees receive adequate and regular health and safety training and education.
- **Incident Reporting** - Business Partners should have internal procedures in place to prevent, manage, track, and report occupational injury and illness. Business Partners shall also include provisions to encourage employee reporting and implementation of corrective action. Business Partners corrective action plans should mitigate risks, provide necessary medical treatment, and facilitate employees' return to work.

## Implementation and Monitoring

Business Partners shall take appropriate steps to ensure the principles of this Code are communicated to their employees.

Business Partners are required to fully acknowledge and understand this Code to ensure their commitment to the values and standards upheld by ByteDance and shall be subject to liability for any financial or reputational damages caused by any violation of this Code as claimed by ByteDance and its subsidiaries and affiliates.

- **Communication** - Business Partners shall communicate the standards and guidelines included in this Code to all employees, board members, officers, managers, agents, and subcontractors or other third parties acting on their behalf in conducting any activities in connection with ByteDance's business. Business Partners shall also maintain appropriate records to demonstrate compliance with the requirements of this Code. ByteDance reserves the right to verify Business Partners' compliance with this Code through on-site audits, which can be performed by ByteDance itself or through third parties appointed for that purpose. Such an audit will be agreed upon in advance with the Business Partner.
- **Speak Up** - Concerns of violations of this Code or any other ethics and compliance concerns related to doing business with ByteDance, can be raised confidentially via [ethics@bytedance.com](mailto:ethics@bytedance.com) or our [Speak Up Hotline](#). Business Partners can report concerns without fear of retaliation. ByteDance ensures that reported concerns and violations are addressed in a timely and appropriate manner.