

ByteDance Business Partner Code of Conduct



1. Introduction

ByteDance is committed to conducting business in accordance with ethical standards and seeks to develop and maintain business relationships with Business Partners who are committed to upholding the overarching principles of integrity, respect, and responsibility in conducting their business. These principles are fundamental to every aspect of ByteDance's business. ByteDance expects our Business Partners to take the same approach in order for us to succeed together.

This Business Partner Code of Conduct ("**Code**") sets detailed standards and responsibilities for each Business Partner in the areas of compliance, business ethics, labor and human rights, health and safety, and environment. Nonetheless, this Code is not intended to be all-inclusive or to address every situation. Furthermore, the principles and requirements in this Code are not intended to replace, supersede, change, or conflict with any applicable legal or regulatory requirements or a Business Partner's contractual obligations with ByteDance.

2. Applicability

"Business Partner" in this Code refers 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 applies to all Business Partners and their employees at all levels, including but not limited to 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 the business of the ByteDance Group entities, its affiliates, and subsidiaries ("ByteDance"). Business Partners should also encourage third parties they work with to comply with the ethical standards and requirements contained in this Code.

3. Compliance with the Code, Laws, and Ethical Business Practices

3.1 Compliance with the Code and Laws

Business Partners must adhere to this Code while conducting business with or on behalf of ByteDance. Business Partners must comply with all applicable laws and regulations of the countries in which they operate and render goods and services.

Where local laws are less restrictive than this Code, a Business Partner must comply with the Code, even if it would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, the Business Partner must always, at a minimum, comply with those laws.

3.2 Anti-Bribery and Anti-Corruption

ByteDance conducts business honestly and ethically and has zero tolerance for unlawful or unethical conduct in any form. This includes but is not limited to corruption, bribery, fraud, extortion, embezzlement, or kickbacks. To foster transparent and trustworthy business relationships, Business Partners must abide by these same standards.

Business Partners must abide by all applicable anti-corruption laws and regulations of the countries in which they operate, international anti-corruption conventions, and ByteDance's relevant policies and procedures. Business Partners must not, directly or indirectly through any third party, offer, give, or accept anything of value—including but not limited to cash, cash equivalents (such as gift cards), loans, job opportunities, gifts, meals, entertainment, travel, charitable or political donations, and sponsorships - to or from anyone (including government officials) to improperly obtain or retain business or any business advantage; facilitation payments are strictly prohibited. If Business Partners extend any business courtesies to ByteDance's employees or representatives, it should be infrequent, of low value, and permissible under the applicable laws and regulations.

3.3 Conflict of Interest

Business Partners must avoid any actual or potential conflict of interest with ByteDance. A "conflict of interest" means a personal interest or activity of a Business Partner or its employees that affects or appears to affect its ability to act in the best interests of ByteDance. Before the commencement of, or throughout the business relationship, Business Partners must promptly disclose to ByteDance any actual or potential conflicts of interest, including those that arise or are anticipated to arise from the relationship between the Business Partner or its employees and ByteDance, its employees, former employees, or representatives. Business Partners must

cooperate with ByteDance to take effective measures to avoid or eliminate any possible impact of such circumstances on the existing or proposed commercial relationship between the parties.

3.4 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.

3.5 Anti-Fraud

Business Partners must ensure that they do not directly or indirectly (including through third parties) engage in, perpetrate, encourage, support, condone, or otherwise participate in any activity that involves the use of deception for monetary or personal gain in a manner that is prohibited by law or regulation. Such activities include but are not limited to: (i) unlawful consumer frauds, scams, and other deceptive business practices related to ByteDance (e.g., frauds perpetrated via ByteDance platforms), that cause any individual or entity to suffer financial or other losses; and (ii) frauds perpetrated on ByteDance itself.

3.6 Fair Competition

Business Partners must comply with all applicable antitrust and competition laws and regulations around the world, winning business through fair and honest means. Business Partners shall not propose or enter into any agreement (written or oral) or otherwise conspire, collude or coordinate business conduct in a manner that harms or reduces competition, including but not limited to attempting to fix, adjust or control prices; dividing or allocating customers or markets; limiting the sale of services, products or product lines; or coordinating with competitors on the bidding process. Business Partners shall not share information or discuss or enter into formal or informal agreements with any competitor relating to competitively sensitive information such as price, profit, costs, and other similar terms.

3.7 International Trade Compliance

Business Partners are required to comply with all applicable international

trade laws and regulations as well as all applicable contractual obligations provided by ByteDance and imposed by ByteDance's upstream Business Partners, including but not limited to those on import and export controls, trade embargoes, and economic sanctions. Business Partners must not engage in business activities or other dealings with sanctioned regions and parties that may cause ByteDance to violate (1) any applicable international trade laws or regulations; or (2) any applicable international trade contractual obligations imposed by ByteDance's upstream Business Partners.

3.8 Anti-Money Laundering

Business Partners must ensure they do not directly or indirectly facilitate any act designed to conceal or disguise the true source of funds derived from illicit activity so that such funds appear to have been derived from legitimate sources. Business Partners must only conduct business with persons or entities who are involved in legitimate business activities and whose funds are derived from legitimate sources, in order to combat money laundering and terrorist financing. Business Partners must conduct business in accordance with all applicable anti-money laundering and anti-terrorism financing laws in the jurisdictions in which it does business, and must ensure that it maintains an appropriate compliance program in order to prevent violations of such laws.

3.9 Insider Trading

Business Partners must ensure that any material non-public information obtained as a consequence of a business relationship with ByteDance ("Insider Information") is not used for the personal benefit of such Business Partners, their employees, or other persons. Business Partners must also not disclose Insider Information to other persons or entities or make any recommendation about whether to trade or invest based on such information.

Determining whether information is "material" requires consideration of all relevant facts and circumstances. In general, "material non-public information" refers to information that would likely be considered important by a reasonable investor in conducting a trade and that has not been previously disclosed to the general public and is otherwise not available to the general public.

3.10 Intellectual Property

Business Partners must take appropriate measures to safeguard and not infringe upon the intellectual property rights of ByteDance and its users, including but not limited to trade secrets, know-hows, patents, copyrights, trademarks, and source codes. Additionally, Business Partners should immediately inform ByteDance of any potential or existing infringement of such rights.

3.11 Information Security and Data Protection

Business Partners must comply with all applicable laws and regulations on cybersecurity, privacy, and data protection, as well as uphold the standards of cybersecurity and data security in their respective countries of operation and the countries or regions where ByteDance operates.

Business Partners must strictly abide by all non-disclosure agreements and other agreements regarding the confidentiality of information and must protect the confidential information that they have access to. All non-public information that Business Partners get access to during their business dealings with ByteDance must be treated as confidential, including but not limited to ByteDance's business information, intellectual property rights, product strategy, proprietary data, financial information, strategic plans, organizational structure, technical or management rules, negotiation information, user/customer information, employee information, and third-party confidential information that ByteDance is under any statutory or contractual obligation to not disclose to the public ("Confidential Information"). Business Partners must only use Confidential Information as authorized and for the purpose for which it was provided.

If any incident occurs or is likely to occur involving Confidential Information (including but not limited to the failure to secure Confidential Information in accordance with relevant agreements or legal requirements, unauthorized disclosure or improper use of Confidential Information, or assets or personal devices containing Confidential Information becoming lost or stolen), it must be reported immediately pursuant to Section 7.3.

3.12 Platform Operation and Product Safety

Business Partners must comply with the applicable laws and regulations on platform operation and product safety. The safety of products and services provided by Business Partners must be guaranteed, while complying with all relevant and applicable product standards and specifications.

4. Labor and Human Rights

Business Partners are expected to treat their employees with the utmost dignity and respect, and in accordance with applicable labor and employment laws, regulations, and the standards set forth in this Code.

4.1 No Child Labor

Business Partners must not use child labor and should have procedures in place to verify and ensure that no child labor is used. "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 (where local laws permit them to work) must not perform work which is hazardous in nature.

4.2 No Forced or Compulsory Labor, Modern Slavery, or Human Trafficking

Business Partners must only use voluntary labor and must not engage in any form of modern slavery or human trafficking, or use any type of forced, bonded, involuntary, or prison labor within their organizations or supply chains. Business Partners must not restrict workers' freedom of movement and allow workers to terminate employment in accordance with local laws. Business Partners must ensure that their management understands such a commitment against forced and compulsory labor, modern slavery, and human trafficking, and must 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.

4.3 Diversity, Inclusion, and Non-Discrimination

Business Partners must be committed to upholding the rights of all their employees and treating them with dignity and respect in settings associated with work. Business Partners must also promote diversity and inclusion at their workplaces and must have fair recruitment, training, and promotion policies.

Business Partners must commit to a workplace free of any form of discrimination or any form of harassment (including but not limited to discrimination or harassment on the grounds of race, color, age, sex, religion, national or ethnic origin, marital status, sexual orientation, gender identity or expression, disability, pregnancy, or any other characteristics protected by applicable laws and regulations). In particular, Business Partners must not tolerate behavior—including but not limited to gestures, language, and physical contact—that is sexual, coercive, threatening, abusive, or exploitative in nature.

4.4 Freedom of Association and Collective Bargaining

Business Partners are expected to recognize and respect the right of employees to freely and voluntarily establish and join unions or associations of their choice (or refrain from doing so), 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 management their grievances in relation to terms and conditions of work.

4.5 Working Hours, Wages, and Benefits

Business Partners must ensure that the working hours of their 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.

5. Health and Safety

Business Partners must commit to creating a healthy and safe work environment and strive for high standards of health and safety for the continuous improvement of working conditions.

5.1 Safe Working Environment

Business Partners must provide a healthy and safe working environment by ensuring compliance with applicable laws and regulations as well as internationally recognized standards. Business Partners must do their utmost to identify and assess possible occupational health and safety risks and take the necessary measures to prevent, control, reduce, or eliminate such risks.

5.2 Health and Safety Communication

Business Partners must ensure that employees receive adequate and regular health and safety training and education. Health and safety-related information must be made available as appropriate to the required parties, including the display of any legally required notices or signs.

5.3 Incident Reporting

Business Partners should have internal procedures in place to prevent, manage, track, and report occupational injury and illness. Business Partners should 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.

5.4 Emergency Preparedness and Response

Business Partners should identify and assess potential emergency situations. For each situation, Business Partners should develop and implement emergency plans and response procedures that will minimize harm to life, environment, and property.

6. Protection of the Environment

Business Partners must comply with all applicable environmental laws, regulations, and standards. We expect our Business Partners to identify and manage the risks and

opportunities presented by climate change, use natural resources efficiently and responsibly, minimize their environmental impact, and continually monitor their environmental performance.

6.1 Environmental Permits and Reporting

Business Partners must obtain, keep current, and comply with all required environmental permits and comply with the reporting requirements of applicable permits and regulations.

6.2 Hazardous Material and Waste

ByteDance is committed to improving business practices to make a positive contribution to our communities. Business Partners producing any kind of waste or emissions must characterize, monitor, control, and treat such waste or emissions prior to discharge or disposal in accordance with applicable laws and regulations. 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, or disposed of safely.

6.3 Pollution Prevention and Resource Reduction

Business Partners must, to the best of their abilities, minimize or eliminate emissions and discharges of pollutants and generation of waste either at the source or by practices such as adding pollution control equipment; improving production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

7. Implementation and Monitoring

7.1 Audits and Assessment

This Code forms part of the agreement with our Business Partners. Business Partners that behave in a manner that is unlawful or inconsistent with this Code risk termination of their business relationship with ByteDance.

Business Partners must maintain documentation reasonably necessary to demonstrate their compliance with this Code. ByteDance reserves the right to audit and verify Business Partners' compliance with this Code, as applicable and permitted by law or where specified in agreements. Such audits can be performed by ByteDance itself or through third parties appointed for that purpose. The procedures and arrangements for the audits will be agreed upon in advance with Business Partners.

7.2 Communication

Business Partners must take appropriate steps to communicate the expectations and requirements within this Code to all employees, board members, officers, managers, agents, subcontractors, or other third parties acting on their behalf in conducting any activities in connection with ByteDance's business.

7.3 Reporting and Speak Up

This Code serves as a guide to ethical Business Partner conduct. Voicing concerns helps us all do business with integrity, respect, and responsibility, and proactively address problems or issues.

Business Partners are encouraged to raise concerns about unethical practices, illegal conduct, or potential violations of this Code through the following channels, without fear of retaliation.

- Email: ethics@bytedance.com
- Speak Up Hotline: <https://compliance.bytedance.com/report/home>

ByteDance will ensure that concerns raised will be handled confidentially, with sensitivity and urgency.