



## CODE OF CONDUCT

This Code of Conduct describes the standards of conduct expected of everyone at BuzzFeed. This Code applies to everyone at BuzzFeed throughout the world, including board members and all employees in all positions. Each BuzzFeed affiliate, worldwide, has adopted this Code, and imposes it directly on its own employees (“BuzzFeed,” as used in the Code, means each BuzzFeed affiliate employer). Because this Code addresses minimum business standards, it also applies to third parties that perform work for BuzzFeed, including contractors, consultants, partners and agents, in relation to their work for BuzzFeed.

### **BUZZFEED’S MISSION AND HOW THIS CODE OF CONDUCT APPLIES TO OUR MISSION**

BuzzFeed’s mission is to impact culture at massive scale by spreading truth, joy and creativity. BuzzFeed was born on the Internet, and is committed to making it a force for good. We strive to create content that has a positive impact on people’s actual lives and the world. We measure our long term success by our scale multiplied by that impact. Equally important is that we balance the ideals of growth with integrity. We engage in ethical and intentional decision-making to honor the commitments made to our community. At the end of the day, we want to be proud of the work we do *and* how we do it.

This Code sets forth the principles and responsibilities that guide how we fulfill our mission. We follow the spirit of this Code as well as the actual words. This Code does not and cannot cover every possible ethical issue that may arise in our work. Instead, the purpose of this Code is to clearly articulate that we care about acting ethically and with integrity in the course of performing our work. BuzzFeed insists on a culture of inclusion, where all will feel comfortable openly asking questions and raising concerns about any ethical or other issues that arise.

BuzzFeed is committed to providing a safe and reliable means for BuzzFeed employees and others to report concerns they may have about conduct at BuzzFeed. The guidelines below explain how to raise concerns confidentially, anonymously (where appropriate) and without fear of retaliation. **If you are not comfortable discussing the concern with your manager or HR Business Partner, you are encouraged to use the Company’s [ethics helpline](#), hosted by a third-party provider, where you can report your concern (anonymously, if necessary).**

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**Ethics Helpline URL:** [buzzfeed.allvoices.co](https://buzzfeed.allvoices.co)

## GUIDING PRINCIPLES

**We are transparent and honest.** We conduct all aspects of our business activities with integrity and according to the highest ethical standards. We communicate in an honest and transparent way and avoid making misleading communications or creating false impressions. If we make mistakes, we acknowledge and correct them.

**We treat others fairly, respectfully and with dignity.** We foster a respectful work environment free of any form of discrimination, harassment and intimidation, and where everyone can bring their whole self to work. We provide equal opportunity in all aspects of employment. We respect diversity and we value differences. As expressed in our Anti-Harassment Policy, we do not tolerate discrimination, harassment, violence, or threatening behavior of any kind.

**We are responsible and law abiding.** This includes following the national and local laws, rules and regulations where we do business. If we are unfamiliar with the legal and regulatory standards that govern our jobs, we ask for help and learn them. If we become aware of wrongdoing, we follow the procedures for reporting wrongdoing described later in this Code.

## RESPONSIBILITIES TO BUZZFEED

**We follow BuzzFeed's policies and procedures.** We are responsible for following BuzzFeed's policies and procedures as they relate to our jobs. If we become aware of violations, we follow the procedures for reporting them described later in this Code. If we are unfamiliar with the policies and procedures that govern our jobs, we ask for help and learn them. We ask everyone to read and follow the applicable Employee Handbook for their jurisdiction.

**We avoid actual conflicts of interest or even the appearance of conflicts of interest.** We have a responsibility to make business decisions strictly on the basis of BuzzFeed's best interests without regard to our personal interests. A conflict of interest occurs when our personal interests, activities, investments, or associations interfere with, or even appear to interfere with, BuzzFeed's interests. We disclose any relationships, investments, associations or activities that may create any actual, potential, or perceived conflict of interest as soon as we become aware of such conflict. Additional information about conflicts of interest, including how to raise them, is contained in our Conflicts of Interest Policy.

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***We are loyal to BuzzFeed.*** We do not compete with BuzzFeed or use BuzzFeed property, information or business relationships for personal gain. Opportunities that belong to BuzzFeed, similarly, may not be diverted for employees' personal gain.

***We protect BuzzFeed's sensitive and confidential information.*** Everyone covered by this Code is expected to safeguard BuzzFeed's confidential, personal, sensitive and proprietary information, including information related to employees, partners and other third parties, and anyone else with whom we do business. We do not disclose information collected by BuzzFeed without proper authorization and only use such information for legitimate business purposes and in accordance with applicable laws and governing contracts. Such confidentiality obligations continue beyond the end of employment. We do not speak on behalf of BuzzFeed unless authorized to do so. Before we speak on behalf of BuzzFeed, we obtain authorization from BuzzFeed's Communications Department. Additional information about communications about the Company is in our Corporate Communications Policy.

***We maintain accurate and complete business and financial records.*** BuzzFeed creates and maintains transparent, reliable and complete financial and business records that comply with applicable requirements and generally accepted accounting practices and BuzzFeed's policies. Employees are responsible for informing appropriate members of BuzzFeed's Finance or Legal Team in a timely manner of anything that might have a material impact on the reliability of our financial records or disclosures.

***We protect and properly use BuzzFeed's assets and resources.*** Theft, carelessness, and waste have a direct impact on our profitability. We treat BuzzFeed's finances, equipment, resources and facilities with care and use these resources for legitimate business purposes, and exercise good judgment when using BuzzFeed's tools and equipment for reasonable personal use. Additional information about appropriate use of BuzzFeed resources is contained in our Delegation of Authority Policy and Travel and Expense Policy. In addition, use BuzzFeed's information systems in a responsible manner consistent with the BuzzFeed Employee Handbook.

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## RESPONSIBILITIES TO THE BROADER COMMUNITY

***We engage in fair business dealings.*** We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair dealing.

***We do not engage in bribery or corruption.*** It is never acceptable to offer, permit or take bribes to advance our business, regardless of local norms or customs. As noted in BuzzFeed's Anti-Corruption Policy, we do not offer or give anything of value for an improper or corrupt purpose, nor do we ask others to do so on our behalf. We ask BuzzFeed's Legal Team if we have questions about whether anything we are doing could be viewed as bribery or corruption.

***We comply with antitrust and competition laws around the world.*** We do not discuss or exchange competitively sensitive information with competitors, nor do we participate in other anti-competitive conduct, such as agreeing with competitors on geographic markets, customers or pricing. Additional information may be found in our Fair Competition Policy. When interacting with a competitor, we ask BuzzFeed's Legal Team if we have questions about whether our actions are proper and in compliance with the law.

***We comply with trade regulations.*** We comply with import and export laws and act in accordance with U.S. economic sanctions and embargoes that prohibit or restrict trade with certain countries or individuals (as well as with local import and export laws in other places where we do business). We consult the Sanctions Policy or with BuzzFeed's Legal Team if we have any questions about compliance with trade regulations.

***We respect copyrights and trademarks.*** We respect laws and regulatory restrictions related to using, copying, displaying or distributing copyrighted written material and software without the prior written permission of the copyright owner. Some examples of copyrighted materials may include: newspapers, books, magazines, photos, art, music, film, software or databases. In addition, we do not infringe on the trademarks, logos and brand names that BuzzFeed does not own. We ask BuzzFeed's Legal Team if we have any questions about compliance with intellectual property laws.

***We do not engage in insider trading.*** We do not buy or sell BuzzFeed stock when in possession of material non-public information, or share such information with others, including friends or family. Additional information is in our Securities Trading Policy.

***We provide full, fair, accurate and timely disclosures of our financial position.*** BuzzFeed's employees, including its senior financial officers, (1) engage in honest and ethical conduct, including with respect to the ethical handling of actual or apparent

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conflicts of interest between personal and professional relationships; (2) provide information that is full, fair, accurate, timely, and understandable in our public filings with and other submissions to the U.S. Securities and Exchange Commission or that are otherwise required to be disclosed by issuers; and (3) comply with applicable government rules and regulations, including but not limited to those having to do with the handling of violations of this Code or other suspected fraudulent actions which may affect the public filings or disclosures made by BuzzFeed or any significant deficiencies in BuzzFeed's internal controls that could affect the ability to properly record, process or summarize financial data.

## ASKING QUESTIONS AND REPORTING CONCERNS

BuzzFeed is committed to providing a safe and reliable means for BuzzFeed employees and others to report concerns they may have about conduct at BuzzFeed. The guidelines below explain how to raise concerns confidentially, anonymously (as appropriate) and without fear of retaliation.

***We use our best judgment and ask questions.*** If unsure whether something violates a law, this Code or a BuzzFeed policy, we contact an appropriate BuzzFeed manager, or BuzzFeed's Legal Team or People Team for help.

***We report violations.*** If we become aware of anything that may be an actual or possible violation of a law, this Code or a BuzzFeed policy, we promptly report our concerns via our reporting process, outlined below. Failure to report a violation or possible violation may itself be considered a violation of this Code or applicable law.

## WAYS TO RAISE QUESTIONS OR REPORT CONCERNS

- Discuss the situation with a manager
- Discuss with a representative in Legal or a Human Resources Business Partner.
- Report the concern to BuzzFeed's Chief Legal Officer or Chief People Officer.
- Speak to the Chief Financial Officer or Corporate Controller about questions or concerns related to accounting, financial controls, internal controls, auditing and any other financial reporting

BuzzFeed takes all reports of a violation or a possible violation seriously. The specific action taken in any particular case will depend on the nature and gravity of the conduct reported and the results of any investigation. BuzzFeed will keep reports confidential to

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the extent that it is consistent with our ability to conduct a full and fair investigation and to comply with our legal obligations.

BuzzFeed is committed to an environment where open, honest communications are the expectation, not the exception. We speak up about violations stated in this Code of Conduct, as well as ask for guidance related to policies and procedure.

**In situations where you do not feel comfortable reporting your concerns directly to someone, you are encouraged to use the ethics helpline, hosted by a third party provider, which allows for you to raise complaints anonymously.**

**Ethics Helpline URL:** [buzzfeed.allvoices.co](https://buzzfeed.allvoices.co)

Additionally, the New York State Division of Human Rights maintains a toll-free hotline that provides counseling and accepts complaints regarding workplace sexual harassment. This hotline can be reached at 1-800-427-2773.

***We do not retaliate for raising concerns, reporting violations or participating in an investigation.*** BuzzFeed takes its culture very seriously. BuzzFeed considers retaliation a violation of this Code and will respond accordingly. Speaking up about retaliation enables BuzzFeed to honor our values. If a complaint of retaliation is verified, appropriate disciplinary action will be taken, up to and including termination of employment or any other working relationship that the accused may have with BuzzFeed.

**If you have a good faith belief that you have been subject to retaliation (such as but not limited to: harassment, suspension, demotion), report it promptly by one of the methods described above.**

***We discipline behavior that is inconsistent with this Code.*** Anyone who violates a law, this Code, or other BuzzFeed policies or procedures may be disciplined, up to and including termination of employment and/or his or her business relationship with BuzzFeed. Certain violations of this Code may be violations of the law, which may result in civil or criminal penalties, and BuzzFeed will cooperate fully with the appropriate authorities in these situations.

QUESTIONS | [compliance@buzzfeed.com](mailto:compliance@buzzfeed.com)