



**CODE OF CONDUCT
FOR DOING BUSINESS
WITH LINKEDIN**

Contents

DEFINITIONS..... 3

INTRODUCTION & SCOPE..... 4

 Expectations..... 4

LINKEDIN VALUES..... 5

MAINTAINING BUSINESS INTEGRITY..... 6

 Anti-Corruption 6

 Trade & Boycotts..... 6

 Competition Laws 6

 Accessibility..... 6

PROMOTING TRANSPARENCY..... 7

 Conflicts of Interest..... 7

 Gifts and Entertainment 7

 Adhering to Statutory Labor Rules and Regulations..... 8

 Accurate Books and Records..... 8

 Insider Trading 8

 Speaking to the Press..... 8

PROTECTING INFORMATION..... 8

 Data Protection 8

 Intellectual Property 9

BUILDING RELATIONSHIPS 9

 No Discrimination, Harassment or Retaliation 9

 Responsible Sourcing 10

 Health and Safety..... 11

SPEAKING UP..... 12

CLOSING NOTES 12

DEFINITIONS

Provider – a supplier, vendor, staffing agency, small business provider, agent, agency, and providers of goods or services to LinkedIn entities worldwide.

Personal Data – any information (that by itself, or when used in combination with other information) can be used to identify, locate, or contact an individual.

- Personal Data includes, for example, names, email addresses, Member IDs, as well as any other information relating to the individual that is associated with their Personal Data.
- Personal Data can be stored in any media or format, including electronic records and paper-based files.
- Personal Data is sometimes referred to as "**Personal Information (PI)**" or "**Personally Identifiable Information (PII)**". If the term "personal information" or "personally identifiable information" is used at LinkedIn it has the same meaning as Personal Data.

Data Controller – the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

Data Processor – a natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Data Controller.

Sub-Processor – a third-party who is processing Personal Data on behalf of a Data Processor. In most cases, LinkedIn Providers are Data Processors of LinkedIn Data and Provider subcontractors are Sub-Processors.

Data Protection Requirements – mean Privacy Laws and the General Data Protection Regulation and any subordinate legislation or regulation implementing the Privacy Laws or GDPR which may apply and related amendments and updates.

- "**Privacy Laws**" means all applicable laws, regulations, and other legal requirements relating to (i) privacy, data security, consumer protection, marketing, promotion, and text messaging, email, and other communications; and (ii) the use, collection, retention, storage, security, disclosure, transfer, disposal, and other processing of any Personal Data, including without limitation, the **Lei Geral de Proteção de Dados** (Brazil's General Data Protection Law) and the **California Consumer Privacy Act**.
- "**General Data Protection Regulation**" or "**GDPR**" means the European Union Regulation on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data.

Other data protection terms not defined in this Code of Conduct shall have the meanings given in the Data Protection Requirements.

INTRODUCTION & SCOPE

LinkedIn seeks to transform the world by creating economic opportunities for every professional worldwide. We believe acting ethically and responsibly is critical to this effort. We don't believe the ends justify the means. Rather, we expect our employees and Providers to do the right thing no matter what. That's where the Code of Conduct for Doing Business with LinkedIn (the "**Provider Code**") comes into play. Like the Standards of Business Conduct our own employees follow (the "**Employee Code**"), this document clarifies our global expectations for all LinkedIn Providers. In conjunction with our Employee Code and core values, our Provider Code helps all of us, working on behalf of LinkedIn, make ethical choices—and take intelligent risks.

Expectations

We expect all our Providers and their employees to understand and comply with our Provider Code, the laws and regulations that apply to their operations. We expect you to have a process for communicating obligations, training, and holding your employees, partners, contractors, suppliers, vendors, providers of goods and/or services, subcontractors, Sub-Processors and agents who do business with you, to equivalent standards of conduct that follow both the spirit and the letter of this Provider Code.

While LinkedIn Providers are expected to self-monitor and demonstrate their compliance to the Provider Code, LinkedIn may audit Providers or inspect Provider facilities to confirm compliance.

We feel that the most successful relationships are built on a mutual understanding of where we want to go, and how we want to get there. That's why, beyond the various legal and regulatory requirements set forth in this Provider Code, we also expect our Providers to share in and commit to our values. Our values are central to who we are at LinkedIn; we want to feel confident that, as our trusted Provider, you will uphold them, too.

We also expect our Providers to protect employees who report ethical concerns from harassment, retaliation, and other adverse action—just as we do at LinkedIn.

LINKEDIN VALUES

No matter how long you've done business with LinkedIn, you should know about our **Mission: to connect the world's professionals to make them more productive and successful**. Our mission is our North Star, and our values stem from our mission. They are the principles by which we run our business. We want to do business with you because we trust that you will embrace our values as readily as we do.

This means:

- **Our Members Come First** - LinkedIn puts our members first, so we expect our Providers to understand and support our members' needs.
- **Relationships Matter** - LinkedIn seeks to build strong, trusting relationships with our Providers so that we succeed together.
- **Be Open, Honest and Constructive** - We strive to communicate clearly, consistently, and constructively, and expect our Providers to do the same with us. We also expect our Providers to SpeakUp when something doesn't feel right so that potential issues get addressed.
- **Inspire Excellence** - Our Providers are encouraged to lead by example, seek to solve big challenges, set measurable and actionable goals, and continuously learn, iterate, and improve.
- **Take Intelligent Risks** - When engaging with LinkedIn, or on our behalf, we expect our Providers to use sound business judgment and informed decision-making to effectively manage risks to LinkedIn.
- **Act Like an Owner** - We selected you because we believe you will look out for our best interests. We expect you to take ownership for each decision you make, knowing that your actions have a direct impact upon LinkedIn's success.
- **Embody Diversity, Inclusion and Belonging** - We believe that everyone plays a vital role in advancing diversity, inclusion and belonging. Our Providers are critical in helping LinkedIn deliver on our aspirational vision of creating economic opportunity for EVERY member of the global workforce.

MAINTAINING BUSINESS INTEGRITY

We are committed to doing business according to the highest standard of integrity. To be successful as a LinkedIn Provider, it's important that your actions are guided by this same standard. Fair, ethical business practices are paramount. We would rather pass up an opportunity than agree to lower our standards in order to get business done.

Anti-Corruption

Doing business with integrity means LinkedIn does not tolerate bribery or corruption anywhere we operate. As a company, we are expected to comply with anti-corruption laws around the world, including the U.S. Foreign Corrupt Practices Act, anti-money laundering and various other anti-corruption laws around the world. As our valued Provider, we expect the same from you. That means:

- You may not provide or receive anything of value to secure an improper advantage. Whether you're attempting to obtain or retain business, secure government authorizations or licenses, or receive other favorable treatment, the rule is the same: if it's a bribe or kickback, we don't allow it.
- You cannot use intermediaries to pay bribes on our behalf.
- You must adhere to LinkedIn's Global Anti-Corruption Policy¹.

Trade & Boycotts

LinkedIn requires our Providers to comply with all international, national, and local rules, regulations, and controls on any technology transfers (physical and electronic), exports, re-exports, and imports, including but not limited to trade laws such as the U.S. Export Administration Regulations and International Traffic in Arms Regulations, and sanctions regulations administered by the U.S. Office of Foreign Assets Control. If located in the United States, Providers must be enrolled in the U.S. Department of Homeland Security's E-Verify program regarding the immigration and employment eligibility of newly hired employees. Providers shall not participate in international boycotts that are not sanctioned by the United States (U.S. government or applicable laws).

Competition Laws

We know that our Providers compete in markets all over the world, and we expect them to do so in a way that's ethical, legal and in line with LinkedIn's values. Making agreements to restrict trade, whether formally or informally, violates U.S. antitrust and other global competition laws, putting you and LinkedIn at risk. Simply put, never agree or appear to agree, to fix prices, collude to assign territories, rig bids, or engage in any other anticompetitive activity. LinkedIn requires all Providers to conduct business in full compliance with anti-trust and fair competition laws that govern the jurisdictions in which they conduct business.

Accessibility

At LinkedIn, we are committed to conducting business with every member of the global workforce in mind. This mission guides us to create products that are accessible to people with a broad range of disabilities and impairments including vision, hearing, mobility, cognitive, speech and mental health

¹ <https://legal.linkedin.com/documents/Global-Anti-Corruption-Policy-2016-05-01.pdf>

conditions. We hold our Providers to the same standard as LinkedIn and count on Providers to create products, apps, and services that are inclusive to people with disabilities.

As a Provider of LinkedIn, we require adherence to the following:

- The most recent version of the international accessibility standard W3C Web Content Accessibility Guidelines (WCAG) when creating any deliverable; and
- All applicable LinkedIn requirements and standards for creating accessible products and services.

PROMOTING TRANSPARENCY

As our Provider, we expect you to be open and honest in your dealings with LinkedIn and others. After all, the decisions you make while working on LinkedIn's behalf don't just reflect on you and your company; they reflect on us, too. When you are transparent about the way you do business, you are helping to strengthen the relationship between your company and ours.

Conflicts of Interest

LinkedIn Providers must be transparent about any interests, activities, or relationships that might conflict (or appear to conflict) with the best interests of our company. Therefore, you are expected to disclose all actual or potential conflicts of interest:

- Providers should not employ, or make payments to, any employee of LinkedIn during the course of any transaction.
- If a Supplier employee has a family or close personal relationship to a LinkedIn employee, the Provider should disclose this fact to LinkedIn or ensure that the LinkedIn employee does so.
- Providers should not benefit by taking advantage of an opportunity you learn about through your company's relationship with LinkedIn that was otherwise intended to benefit LinkedIn.

Gifts and Entertainment

We know that relationships matter, but lavish gifts, meals, entertainment, and travel can create the appearance of a conflict of interest or be perceived as a bribe. For these reasons, you must be careful about the kinds of business courtesies you offer to or accept from others, including LinkedIn employees; these courtesies should not be provided to gain an improper business advantage. When deciding whether to give, or accept, a gift, entertainment, or other courtesy, we expect you to follow the LinkedIn Gift and Entertainment Policy and keep the following guidelines in mind.

- Entertainment and meals should be modest, infrequent, and occur in the normal course of business.
- Government officials or agents may have restrictions on the types of business courtesies they can accept. Travel expenses should never cross the line between reasonable and excessive. All Providers must comply with LinkedIn's Travel Requirements as posted on the LinkedIn Supplier Information website.

Adhering to Statutory Labor Rules and Regulations

As a LinkedIn Provider, we expect you to abide by all labor statutes, rules and regulations that apply where you locate personnel in support of LinkedIn. You are also required to provide LinkedIn the ability to audit and inspect any records related to compliance with various labor laws, as requested by LinkedIn.

Accurate Books and Records

Our Providers are expected to cooperate fully and respond promptly to any reasonably requested audits, document requests, or other inquiries regarding the business dealings between us. Your business and dealings must be accurately reflected in your books and records. A successful partnership between your company and LinkedIn hinges on accuracy, completeness, and transparency, so it's crucial that you do not hide, fail to record, or make any false entries in connection with any records you prepare on behalf of LinkedIn. Falsifying records isn't just a violation of our Provider Code and values—it's also a violation of the law.

Insider Trading

During the course of your relationship with LinkedIn, you may be made aware of information that isn't readily available to the public. It is important that you never trade in Microsoft securities, which is our parent company (including stock, derivatives, and so on) on the basis of material non-public information, relating to Microsoft. Material means that an average investor would find the information important in making an investment decision about Microsoft. Non-public means that it's confidential information not yet shared with the public. Buying or selling securities based on this kind of information—or tipping others to do so—is a violation of insider trading laws and can have serious consequences for you and us.

Speaking to the Press

Providers may only speak to the press on behalf of LinkedIn if expressly authorized, in writing, to do so by a LinkedIn Corporate Communications, Media Relations representative.

PROTECTING INFORMATION

The information we amass and generate is one of our strongest competitive advantages. It's also something we must be incredibly mindful of, in the interest of maintaining the trust of our members and other stakeholders. We expect all LinkedIn Providers to treat our information—including that of our members, customers, and employees—with care and confidentiality.

Data Protection

At LinkedIn, our fundamental philosophy is “members first.” That value powers the decisions we make, including how we gather and respect the personal information of our members, employees, and other individuals. We expect our Providers to:

- Keep confidential information safe from loss, theft, or unauthorized access or disclosure.
- Comply with all applicable data privacy laws and regulations, as well as all applicable LinkedIn policies regarding data handling.
- Implement security measures designed to protect personal information that LinkedIn may provide in accordance with state-of-the-art industry standards.

- Collaborate with us on ensuring data security and in investigating and responding to data incidents or breaches, should they occur, and support the LinkedIn data delete process in response to complying with data subject rights requests.
- Data Processors must act on instruction from LinkedIn (the Data Controller) before processing Personal Data.
- Only use LinkedIn's Personal Data and assets for legitimate business purposes and as defined in a written agreement between our companies.
- Providers must obtain written authorization, from LinkedIn, prior to engaging a Sub-Processor to fulfill obligations to LinkedIn, in addition to meeting any other obligations contained in any agreement a Provider may have with LinkedIn.

If you are provided access to LinkedIn's computer or communications systems, networks, systems, applications, storage, services, or other IT infrastructure, or if you process Personal Data on LinkedIn's behalf, you are responsible for using these assets appropriately. Any such access must be used only for the purpose of conducting LinkedIn business and must comply with LinkedIn's information security and data handling standards.

Intellectual Property

We expect our Providers to respect the intellectual property rights of LinkedIn, other companies with whom we work, and other third parties, by obtaining all the necessary supporting agreements to provide information, services, and other deliverables to LinkedIn. We also expect that you will take all necessary steps to protect LinkedIn's trademarks, copyrights, patents, and other intellectual property from loss, theft, accidental disclosure, or misuse.

BUILDING RELATIONSHIPS

Relationships matter at LinkedIn, so it's important that anyone we work with shares the commitment to building relationships firmly rooted in trust and mutual respect. We feel strongly about treating our Providers equitably and expect that, while working with us, you will treat LinkedIn's employees and members—as well as your own employees and communities—the same way.

No Discrimination, Harassment or Retaliation

LinkedIn strives to create a comfortable, respectful work environment everywhere we do business. As part of this goal, discrimination, harassment, or retaliation against anyone, by any LinkedIn employee, director, officer, contractor, customer, client, supplier, vendor, or any other business partner or Provider, will not be tolerated. Similarly, we expect that our Providers will not take or tolerate any discriminatory, harassing, or retaliatory action against anyone in the workplace or while conducting LinkedIn business.

Any decisions related to a person's employment or treatment in the workplace should be based on merit—not on categories protected by applicable law, including (but not limited to):

- Age
- Ancestry
- National origin
- Race

- Color
- Creed
- Religious and philosophical beliefs
- Exercising family and medical care leave rights
- Medical condition
- Mental and/or physical disability
- Genetic information
- Marital status
- Sex (including pregnancy, childbirth, breastfeeding, and related medical conditions)
- Gender
- Gender identity
- Gender expression
- Sexual orientation
- Military status
- Veteran status
- Citizenship
- Trade union membership or status
- Family status
- Political affiliations
- Health and biometric data

Responsible Sourcing

At LinkedIn, Responsible Sourcing drives our ambition to conduct business in a manner that supports and contributes to a more diverse, inclusive, and sustainable Provider ecosystem. Through collaboration and partnership our aim is to establish a shared responsibility to improve the wellbeing of people and the planet. Recognizing that this is a joint effort, we expect our Providers to set clear, actionable goals to do so as well, including at minimum the following:

- **Be conscious of your impact on the environment.**
 - Comply with all applicable environmental laws and regulations, including but not limited to applicable laws and regulations that regulate hazardous materials, air, water, emissions, and wastes.
 - Obtain and maintain any required environmental permits, approvals, and registrations and follow their operations and reporting requirements.
 - Consider the potential environmental impacts of your daily business decision-making processes and seek opportunities to conserve natural resources, reuse, and recycle, reduce resources, reduce greenhouse gas emissions and waste, and control pollution.
 - Prevent, reduce, or eliminate waste of all types including water discharges and energy losses, by implementing appropriate conservation measures in Provider facilities. Avoid the use of hazardous materials where possible and evaluate materials that may be released. Ensure appropriate handling of such materials which may pose a threat to the environment during use and final disposal. Implement environmental management systems and policies, make continuous improvement in your environmental impacts, and

implement policies and practices that encourage similar environmental stewardship from your suppliers.

- Inform LinkedIn of environmentally preferable services and product offerings, such as those with environmental certifications.
 - Upon request, Providers to disclose complete, consistent, and accurate Scope 1,2, and 3 greenhouse (GHG) emissions data and/or components required to calculate GHG emissions data through the CDP (Carbon Disclosure Project) or an alternative method approved by LinkedIn.
 - Upon request, Providers will provide strategic plans to address GHG emissions and/or additional information on overall environment performance within Provider facilities.
- **Achieve and maintain best practices to advance diversity and inclusion.** Creating economic opportunity for every member of the global workforce is at the core of what we do. In line with that mission, we seek to build a more diverse, inclusive, and equitable Provider community. Through our Supplier Diversity Program, we ensure that all Providers have an equal opportunity to work with us.
 - **Uphold human rights.** We see human rights, including privacy rights, as integral to our vision of creating economic opportunity for the world’s workforce. Do your part. Respect and enrich global communities by using only voluntary labor. Prohibit the use of child labor and all forms of forced or compulsory labor and human trafficking² by you and your affiliates, subcontractors, and extended supply chain. Further, respect employee rights of association and collective bargaining, consistent with local law.
 - **Ensure everyone you work with is fairly compensated in for the work they do.** Providers must comply with all applicable wage and hour, benefits, taxes, and government regulations as an employer and require the same of your subcontractors.

Health and Safety

We are committed to providing safe and healthy working conditions for our employees and all guests on LinkedIn sites. Our Providers who provide onsite services to LinkedIn, or who visit us on our sites, are expected to help us maintain safe and healthy working conditions— for our employees and yours. In reaching this goal, it’s your responsibility to:

- Comply with all health and workplace safety regulations and practices that apply to your work, as well as applicable LinkedIn workplace policies.
- Provide a safe and healthy work environment to help prevent accidents or injury arising out of, associated with, or occurring in the course of work, or as a result of the operation of employer facilities.
- Ensure and promote a respectful, non-violent work environment that is free of threats, intimidation, and physical harm.

² We require that you review and embrace our commitment to integrity and ethical behavior as noted in our Modern Slavery Act Statement. https://legal.linkedin.com/content/dam/legal/Modern_Slavery_Act_Statement_2020.pdf

- Implement occupational health and safety management systems and controls that identify hazards and assess, and control risk related to their specific industry.
- Provide training for your employees, ensuring they are educated on health and safety issues, complying with all applicable occupational health and safety laws and regulations. Ensure that workers are provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities. Worker dormitories and transportation, if provided, must meet applicable host-country housing and safety standards, and be maintained in a clean and safe manner.
- Establish and implement business continuity plans that address topics, including but not limited to natural disasters, pandemics, workplace incidents, emergencies, and other potential business interruptions.
- Prohibit the use, possession, distribution, or sale of illegal drugs.

SPEAKING UP

A big part of being open, honest, and constructive is talking about issues as soon as they arise. When you do business with LinkedIn, we expect and encourage your employees and contractors to ask questions, raise concerns and report suspected violations of this Provider Code. In other words: SpeakUp. We make the **LinkedIn Integrity Helpline** available to all of our Providers, both by phone at 1-844-804-LNKD and [online](#)³ (where you can also find international numbers), to help you do just that.

We want speaking up to be a worry-free process. When our Providers make good faith reports about violations of this Provider Code or about a LinkedIn employee's violation of LinkedIn's Employee Code, we take them seriously. We will not subject you or your employees to harassment, retaliation, or any other adverse consequences for speaking up in good faith, period. We also aim to keep reports confidential to the extent possible, consistent with the need to conduct an adequate investigation.

LinkedIn's expectations are clear. Failing to comply with them may lead to a variety of consequences, based on the severity of the violation. These include, but are not limited to, removal of Provider personnel from LinkedIn sites, termination of specific projects with LinkedIn, immediate termination of your relationship with LinkedIn and potential civil and criminal liability.

CLOSING NOTES

Our relationships are important to us. If you have any questions about the content set forth in this Provider Code, or if you suspect a possible violation of our Provider Code, Employee Code, LinkedIn policy, or the law, don't hesitate to reach out to the LinkedIn Integrity Helpline.

As our business continues to grow and our needs evolve, we may revise this Provider Code to reflect changes in our policies or the law. As a LinkedIn Provider, you will be expected to comply with the most current version of the Provider Code at all times.

³ <https://app.convercent.com/en-us/LandingPage/39af0eee-9737-e411-80ef-00155d620d58>