CODE OF CONDUCT
FOR DOING BUSINESS WITH LINKEDIN
## TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>TABLE OF CONTENTS</td>
<td>2</td>
</tr>
<tr>
<td>INTRODUCTION</td>
<td>1</td>
</tr>
<tr>
<td>Expectations</td>
<td>1</td>
</tr>
<tr>
<td>LINKEDIN VALUES</td>
<td>2</td>
</tr>
<tr>
<td>MAINTAINING BUSINESS INTEGRITY</td>
<td>3</td>
</tr>
<tr>
<td>Anti-Corruption</td>
<td>3</td>
</tr>
<tr>
<td>Competition Laws</td>
<td>3</td>
</tr>
<tr>
<td>PROMOTING TRANSPARENCY</td>
<td>3</td>
</tr>
<tr>
<td>Conflicts of Interest</td>
<td>3</td>
</tr>
<tr>
<td>Gifts and Entertainment</td>
<td>3</td>
</tr>
<tr>
<td>Adhering to Statutory Labour Rules and Regulations</td>
<td>4</td>
</tr>
<tr>
<td>Accurate Books and Records</td>
<td>4</td>
</tr>
<tr>
<td>Insider Trading</td>
<td>4</td>
</tr>
<tr>
<td>PROTECTING INFORMATION</td>
<td>4</td>
</tr>
<tr>
<td>Data Protection</td>
<td>5</td>
</tr>
<tr>
<td>Intellectual Property</td>
<td>5</td>
</tr>
<tr>
<td>BUILDING RELATIONSHIPS</td>
<td>5</td>
</tr>
<tr>
<td>No Discrimination, Harassment or Retaliation</td>
<td>5</td>
</tr>
<tr>
<td>Social Responsibility</td>
<td>6</td>
</tr>
<tr>
<td>Health and Safety</td>
<td>7</td>
</tr>
<tr>
<td>SPEAKING UP</td>
<td>7</td>
</tr>
<tr>
<td>CLOSING NOTES</td>
<td>7</td>
</tr>
</tbody>
</table>
INTRODUCTION
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 business partners to do the right thing no matter what.

That’s where our Code of Conduct for Doing Business with LinkedIn (the “Business Code”) comes into play. Like the Standards of Business Conduct our own employees follow (the “Employee Code”), this document clarifies our global expectations for our partners. In conjunction with our Employee Code and core values, our Business Code helps all of us working on behalf of LinkedIn make ethical choices—and take intelligent risks.

Expectations
We expect all of our partners and their employees to understand and comply with our Business Code and the laws that apply to their operations. This includes our alliance partners, channel partners, suppliers, vendors, contractors, consultants, agents, and providers of goods and services who do business with LinkedIn entities worldwide. We expect you to hold your employees, subcontractors and agents to equivalent standards of conduct that follow both the spirit and the letter of this Business Code.

We feel that the most successful partnerships 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 Business Code, we also expect our partners 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 partner, you will uphold them, too.

To ensure these expectations are consistently met, LinkedIn business partners should have a process for communicating obligations, training employees and agents, and measuring compliance with this Business Code and the law. We also expect our partners to protect employees who report ethical concerns from harassment, retaliation, and other adverse action—just as we do here.
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 business partners to understand and support our members’ needs.

- **Relationships Matter** - LinkedIn seeks to build strong, trusting relationships with our business partners so that we succeed together.

- **Be Open, Honest and Constructive** - We strive to communicate clearly, consistently and constructively, and expect our business partners to do the same with us. We also expect our partners to SpeakUp when something doesn’t feel right so that potential issues get addressed.

- **Demand Excellence** - Our business partners 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 business partners 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.
MAINTAINING BUSINESS INTEGRITY

We are committed to doing business according to the highest standard of integrity. To be successful as a LinkedIn business partner, it’s important that your actions are guided by this same standard. We encourage you to hold your employees, subcontractors, and agents to adopt and implement equivalent standards of conduct that follow both the spirit and the letter of this Business Code. 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. Period. As a company, we are expected to comply with anti-corruption laws around the world, including the U.S. Foreign Corrupt Practices Act and various other anti-corruption laws around the world. As our valued partner, 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, we don’t allow it.
- You cannot use intermediaries to pay bribes on our behalf.

Competition Laws

We know that our business partners 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.

PROMOTING TRANSPARENCY

As our business partner, 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 business partners 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:

- Partners 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 supplier should disclose this fact to LinkedIn, or ensure that the LinkedIn employee does so.
- Partners 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, keep the following guidelines in mind:

- Any gifts you offer or accept should be reasonable
- Entertainment and meals should 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

Adhering to Statutory Labour Rules and Regulations
As a LinkedIn Business Partner, we expect you to abide by all labour 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 labour laws, as requested by LinkedIn.

Accurate Books and Records
Our business partners 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 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 Business 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 do not trade LinkedIn securities (including stock, derivatives, and so on) on the basis of material non-public information, relating to LinkedIn. Material means that an average investor would find the information important in making an investment decision about LinkedIn. 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 LinkedIn.

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 business partners to treat our information—including that of our members 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 business partners to:

- **Keep confidential information safe** from loss, theft, or accidental disclosure.
- **Comply with all applicable data privacy laws** and regulations, as well as all applicable LinkedIn policies regarding data handling.
- **Implement information security safeguards** designed to protect personal information that LinkedIn may provide in accordance with industry standards.
- **Collaborate with us on ensuring data security and in investigating and responding to breaches**, if they occur.
- **Only use LinkedIn’s assets for legitimate business purposes.**

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 information 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 standards.

Intellectual Property
We expect our business partners to respect the intellectual property rights of LinkedIn and other companies with whom we work, 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 partners 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, will not be tolerated. Similarly, we expect that our business partners 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
• Religion
• 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

Social Responsibility
LinkedIn is committed to supporting and contributing to the communities where we live and work. We expect our business partners to set clear, actionable goals to do so as well, including, at a minimum, the following:

● Be conscious of your impact on the environment.
  ○ Comply with all applicable environmental laws and regulations.
  ○ 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.
  ○ Avoid the use of hazardous materials where possible.
  ○ Implement environmental management systems and policies, make continuous improvement in your environmental protection 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.

● 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 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 for the work they do. 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 business partners 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.
- 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.

SPEAKING UP

A big part of being open, honest, and constructive is talking about issues as soon as they arise. When you partner with LinkedIn, we expect and encourage your employees and contractors to ask questions, raise concerns and report suspected violations of this Business Code. In other words: SpeakUp. We make the LinkedIn Integrity Helpline available to all of our business partners, both by phone at 1-844-804-LNKD and online (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 partners make good faith reports about violations of this Business 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 business partner 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 partnerships are important to us. If you have any questions about the guidelines set forth in this Business Code, or if you suspect a possible violation of our Business 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 Business Code to reflect changes in our policies or the law. As a LinkedIn business partner, you will be expected to comply with the most current version of the Business Code at all times.