

Optimizely Code of Conduct

Overview

Optimizely, Episerver and its companies, including but not limited to Episerver AB, Episerver Inc., Optimizely Inc., Episerver UK Ltd., Episerver GmbH, Episerver Pty Ltd, Insite Software Solutions Inc., Idio Inc. and Zaius Inc. ("Optimizely" or "We") operate in many markets and countries throughout the world, always committed to being a responsible organization that works sustainably, has good ethics and a great community commitment. As a commercial organization Optimizely strives to work efficiently and achieve good economic results which will provide resources for business development and benefits to customers and partners, as well as contribute to a long-term, sustainable development.

Optimizely's business is built on three core values: dependable, collaborative and simple. Coupled with these core values, we are fully committed to sustainability, security and innovative.

In order to ensure a responsible behavior this code of conduct (the "Code") will describe Optimizely's requirements on its customers, partners, and suppliers (as well as their sub-suppliers and partners), which mimic Optimizely's own code of conduct. These requirements are based on Global Compact, the UN's Universal Declaration of Human Rights and International Labour Organization ("ILO") Declaration on Fundamental Principles and Rights at Work, and are the same guiding requirements for Optimizely, its employees and owners. The Code shall be communicated to sub-suppliers and partners, and the compliance is monitored. The Code may require an accompanying self-declaration to be completed and signed in order to show how the Code is complied with.

General Obligations to the Code

We, the officers and staff of all companies in the Optimizely group, recognize our obligations to all who have a stake in our success including share owners, customers, partners, staff and suppliers;

Information about our business shall be communicated clearly and accurately in a non-discriminatory manner and in accordance with local regulations;

We expect and require all our business partners, suppliers, and customers to have the same commitment to the Code.

Legal, Privacy and Tax Compliance

Optimizely shall follow national laws, transnational laws and regulations, as well as pay statutory taxes applicable in the countries where the business is carried out. In all instances, Optimizely respects national laws and any other laws with an international reach, such as the UK Bribery Act, OECD Anti-Bribery Convention, and the US Foreign Corrupt Practices Act, where relevant, and industry codes of conduct. Optimizely committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity.

We will treat all information relating to the Optimizely's business, or to its customers, partners and suppliers, as confidential. In particular, user of confidential information for purposes other than those explicitly granted is expressly prohibited and confidential information must not be used for personal gain;

We are committed to protecting customer, partner, supplier and employee data in accordance with national laws and industry codes. We expect our customers, partners and suppliers to act the same, as well as protect the personal data of Optimizely's employees, and use this data for legitimate and authorized business purposes only. Customers, partners and suppliers must be clear on when and how they collect, use or share personal data. As Optimizely does, customers, partners and suppliers should take appropriate security measures to protect the data;

We expect and require all our business partners, including suppliers, to have the same commitment to legal, privacy and tax compliance.

Business Ethics and Corruption

Actions that involve corruption, breach of trust, fraud, unfair competition, and the like leads to increased costs, will ruin customers, partners and suppliers trust and will ultimately endanger Optimizely's business. Anything that may be connected with corruption in a broad sense shall be avoided and shall not occur. If detected, it should be reported immediately, and actions shall be taken to control the behavior.

We will not knowingly engage in work which contains statements, suggestions or images offensive to general public decency and will give appropriate consideration to the impact of our work on minority segments of the population, whether that minority be by race, religion, national origin, color, sex, sexual orientation, gender identity or expression, age or disability. We will not undertake work which is intended or designed to mislead, including in relation to social, environmental and human rights issues.

We will consider the potential for customers, partners, suppliers or work to damage Optimizely's reputation prior to taking them on. This includes reputational damage from association with customers, partners and suppliers that participate in activities that contribute to the abuse of human rights;

We will not give, offer or accept bribes, whether in cash or otherwise, to or from any third party, including but not restricted to government officials, clients and brokers or their representatives. We will collectively ensure that all staff understand this policy through training, communication and by example;

- We will not offer any items of personal inducement to secure business. This is not intended to prohibit appropriate entertainment or the making of occasional gifts of minor value unless the customer has a policy which restricts this;
- We will not accept for our personal benefit goods or services of more than nominal value from suppliers, potential suppliers or other third parties;
- We will not have any personal or family conflicts of interest within our businesses or with our suppliers or other third parties with whom we do business;
- No corporate contributions of any kind, including the provision of services or materials for less than the market value, may be made to politicians, political parties or action committees, without the prior written approval of the Optimizely board of directors.

We expect and require all our business partners, including suppliers, to have the same commitment to business ethics, anti-bribery and anti-corruption provisions.

Discrimination

People that We, our customers, partners and suppliers deal with are to be treated with dignity and respect. We do not harass or discriminate, whether through culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation, gender identity, age or any other feature that is protected under national law.

We select and promote our people on the basis of their qualifications and merit, without discrimination or concern for culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation, gender identity or age.

Customers, partners and suppliers shall not allow any kind of discrimination based on culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation, gender identity, age or any other feature that is protected under national law. The employees of our business partners, suppliers and customers should be assessed and treated based on the individuals' qualifications and abilities.

Workplace Environment

Optimizely believes that a workplace should be safe and civilized; We will not tolerate sexual harassment, discrimination or offensive behavior of any kind, which includes the persistent demeaning of individuals through words or actions, the display or distribution of offensive material, or the use or possession of weapons on Optimizely premises. Optimizely shall respect and follow the UN's Universal Declaration of Human Rights as well as ILO's eight core conventions.

We will not tolerate the use, possession or distribution of illegal drugs, or our people reporting for work under the influence of drugs or alcohol;

We expect and require all our business partners, including suppliers, to have the same commitment to the workplace environment.

Child, forced labor, conditions and salaries

Optimizely shall not allow child or forced labor to occur itself or through its customers, partners or suppliers. People are not to be employed against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights. Legal minimum age requirements as outlined in the relevant ILO conventions and the laws of the countries of operation are adhered to and children under the age of 16 are not to be employed.

The normal working hours may not exceed the number of hours allowed under each respective country's national laws and regulations. In case overtime occurs, it may not be mandatory, and it shall be adequately compensated. The salary shall be higher than, or equal to, the minimum salary stipulated by national law, however not lower than the so-called "living salary", i.e. in accordance with the UN's definition. Salary and other benefits shall be paid out regularly and in the currency of the country where the business is carried out.

Customers, partners and suppliers shall not allow any kind child or forced labor to occur and should strive to meet the same work conditions and salary requirements.

Sustainability and the Environment

Optimizely shall work systematically and actively to minimize the climate and environmental impacts by reducing emissions to air, land and water, as well as increasing the efficiency for its use of resources including raw materials, energy and other natural resources while minimizing waste, emission and noise. There shall also be a systematic approach for reducing the impact on biological diversity.

We will comply with all relevant environmental laws and ensure that necessary permits are in place. We care about the communities we operate in, participate in their betterment and listen to their concerns.

We expect and require all our business partners, including suppliers, to have the same commitment to sustainability and the environment.