

PANTHEON

Global Code of Conduct



Pantheon has changed in many ways since our company first began. Our product offerings have matured, our business has expanded, and our team is significantly larger and more distributed. What hasn't changed, however, are the things that define the true essence of Pantheon – our purpose, our values and our ethical standards. These are what make us unique and guide us in how we work with one another to deliver incredible value to our customers.

At Pantheon, we are committed to creating and maintaining a workplace that represents the traits and principles we, as a company, value most. For us, this means a steadfast commitment to the open web, our customers, our communities, and each other. Every day we face decisions that challenge our principles. When we respond to these challenges with a focus on ensuring ethical standards that align to our values, we will succeed both individually and as an organization.

This Global Code of Conduct is designed to help us when we are faced with difficult decisions. Together with our employee policies, this code lays the foundation for our day-to-day behavior and decisions. It is important to acknowledge, however, that these are not all encompassing, and we must ingrain our values of Customers First, Trust, Teamwork, and Passion in our daily behavior and activities.

Ethical and compliant behavior is not always easy or obvious, and we can't do it alone. Ensuring that Pantheon is – and will continue to be – an ethical organization is a team sport that requires active participation from all of us. When tough decisions arise, you can always look for help and support from your colleagues, manager, and the Executive Team.

Jody Swartz
Senior Vice President, People

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Who we are?

Pantheon is the single SaaS platform provider that affordably brings together all facets of website operations - building, hosting, maintenance, performance, deployment and security. All combined with support, education and professional development. All in one, secure dashboard.

Purpose

Pantheon's purpose is to put the magic of the internet in everyone's hands.

Our Hows

Our hows explain how Pantheon is special or different from our competitors. They explain how we deliver on our brand purpose and separate us from other vendors in the market.

1. Pantheon builds technology that revolutionizes the way digital teams work.

- Making life better for digital creators, freeing them to deliver experiences they're proud of.
- Creating a safe space to redefine what digital experiences can be.
- Improving collaboration between diverse teams and talent.
- Enabling transformational change that unlocks extraordinary performance.

2. We are devoted to the relentless pursuit of better.

- Making not just better tools, but best practices made better.
- Continuously raising the bar on what's possible.
- Being unafraid to question the status quo.
- Creating richer digital experiences that engage and inspire.

3. We make room for everyone to bring their best ideas to life.

- Defending the inclusivity of the internet.
- Leading by example with equality, diversity, inclusivity and accessibility.
- Cultivating a community unafraid of bold ideas, diversity and debate.
- Partnering with, and working to recruit, the world's most talented people.

Values

Customers First

Customers sit at the heart of everything we do. By listening and learning from our diverse customer base, Pantheon inspires confidence, increases productivity across teams, and impacts key drivers of success for the organizations we serve. We strive to provide the best possible platform for our customers to deliver extraordinary websites that web teams can be proud of. We learn from every customer perspective and experience, and we strive to exceed expectations again and again.

Trust

Pantheon's purpose is to put the magic of the internet in everyone's hands. To deliver on that purpose, we trust our employees to make room for everyone to bring their best ideas to life and to lead by example with equality, diversity, inclusivity and accessibility. Trust clears the path for experimentation and creativity, which yield innovation and growth. We take accountability seriously and we show our colleagues and customers that we do not drop the ball. We work with integrity and are committed to doing what is right for Pantheon.

Teamwork

WebOps is a team sport, meaning it requires cross-functional collaboration to drive the key results our customers need to create digital experiences that engage and inspire.

Pantheon embraces teamwork and partnership for everything we do, knowing that when we work together effectively, we show up in the best possible way for our customers and company. We're willing to go to bat for our colleagues when they need support or their ideas amplified. We know that emotional intelligence impacts performance and that only through empathy and inclusion can we bring out the best in each other.

Passion

Pantheors work at the intersection of ambition and humility. We hire people who love what they do and who bring that energy and enthusiasm into their work, inspiring those around them to show up authentically and give it their all. Our curiosity is boundless and we're always eager to find new solutions. We truly care – about our company, about our product, about our customers, about our community. We cultivate an environment where Pantheors can bring their whole selves to do their best work.

Overview/What is a GCOC?

Pantheon moves fast and is constantly adapting to changing market conditions. This Global Code of Conduct (“GCOC”) serves as a guide to ensure ethical behavior that is rooted in Pantheon’s purpose and values. When we all are clear on our values, operating principles, and compliance priorities, together we can scale a healthy global business, reach new markets, and connect with new customers.

Who is Responsible for the Code?

We all are! Every employee or contractor/consultant directly engaged with Pantheon, including all of our subsidiaries and related entities (together “Pantheors”), is required to view and acknowledge this GCOC, and we all share responsibility for ensuring that our actions are consistent with the GCOC. There may also be instances where we require vendors, suppliers, partners, or customers to sign this GCOC.

What is My Responsibility?

Each Pantheon is responsible for behaving in a manner consistent with this GCOC, and to *Speak Up* if they believe that any other employee, contractor, consultant, vendor, supplier, partner, or even a customer is violating this GCOC. We all have a duty to act responsibly and ethically as a regular practice of our day-to-day work and have the courage to *Speak Up* as Pantheons. You can do this by asking a few simple questions:

- Is this consistent with Pantheon's values?
- Could this be a violation of law?
- Who could this harm?

For Pantheons, failure to adhere to this GCOC, or any other Pantheon policy, may result in disciplinary action up to and including termination or ending your relationship with Pantheon, consistent with applicable local law.

This GCOC applies to all Pantheon's globally, Pantheon contractors and other parties that conduct business with Pantheon, it covers all aspects of your Pantheon employment or business relationship, which may include recruiting practices, day-to-day interactions, how we engage with outside parties (e.g., RFP processes), and work-related events held off-site. No matter where you are working, if you are representing or engaging with Pantheon, this GCOC applies.

How Can Managers Encourage Ethical and Values-Driven Behavior?

Pantheon has high expectations for our managers. Below are a few of the behaviors we expect from managers:

- Promote a *Speak Up* culture by fostering an open, inclusive, and accepting environment for all Pantheons.
- Listen to their team members' concerns and either help them to report or make a report on their behalf.
- Recognize and reward those who exhibit behavior consistent with this GCOC.

- Respect the investigation process, including confidentiality requirements, and support the implementation of corrective action.
- Ensure they and their team are trained to spot harassment, compliance, and ethics concerns.

How Do I *Speak Up*?

Pantheon welcomes feedback, concerns, or complaints. If Pantheon is not aware of a problem, we cannot fix it. You may *speak up* on behalf of yourself, your team, or other employees regarding something you witness happening to someone else, or anything that is concerning to you. There are many ways to *speak up*, including these examples:

- Talk to someone in a position of authority:
 - Your manager;
 - People Business Partner;
 - Legal Team; or
 - Executive Team
- Make a report through Pantheon’s Ethics Hotline, which can be found [here](#).
- Call 1-844-800-1074 (available only within the U.S., Guam, Puerto Rico, and Canada)
 - Calls and reports may be made anonymously, but we ask that reports include enough detail to allow Pantheon to appropriately respond and address the report.

Investigations/Disciplinary Action

Pantheon will promptly review all questions and concerns, and will take appropriate action based on the nature of the report. Where appropriate, Pantheon will conduct an investigation. Pantheon expects its employees to cooperate fully with investigators, which includes providing all relevant and truthful information. We’re all on the same team here!

Investigations will be conducted confidentially to the extent reasonable and permitted by applicable law, but it's important to understand that Pantheon cannot commit to providing 100% confidentiality during any investigation.

Upon concluding an investigation, Pantheon will take efforts to ensure any inappropriate behavior does not occur again, even if it does not find that a violation of law or policy occurred. Due to privacy laws or other legal obligations, Pantheon may not be able to provide certain results of the investigation with complaining parties and witnesses.

Should Pantheon determine disciplinary action should be taken due to the findings of an investigation, it will be issued consistent with applicable local laws.

No Retaliation

Pantheon does not tolerate any retaliation against an individual who raises a complaint and/or participates in an investigation. Any employee who feels they have been retaliated against should make a report immediately.

Our Working Environment

Diversity, Equity, Respect, and Dignity for All

Pantheon believes that diversity is key to our success and building a workplace where all Pantheors truly feel heard, respected, and valued. Pantheon's success has been built over years of actively listening to those in our community, employees, customers, and suppliers. A rich diversity of perspectives shapes healthy dialogue and strengthens our outcomes based on the merits.

Each Pantheor is responsible for promoting a positive culture of belonging, in every interaction and in every context with their work with Pantheon. Pantheors can support diversity by creating spaces where opinions are heard, differences are valued, open dialogue is encouraged, and unique perspectives are appreciated.

PRGs and Celebration of Diverse Communities

Pantheon supports its Pantheon Resource Groups (PRGs), including our Black x Latinx, Asian, Pridetheon+, and Women of Pantheon PRGs. These important communities build spaces of belonging and provide educational opportunities for all Pantheors to learn more about and celebrate our diverse communities.

Inclusive Language at Pantheon

What does inclusive language mean at Pantheon? It's how we show up. At Pantheon, everyone has a responsibility to communicate and behave inclusively. Our a11y group helps us support this commitment by providing a special focus on accessibility needs. Embracing inclusive language is seen in the way we lift others up, show up for others, speak in group settings, and consistently consider other perspectives and backgrounds. Learn more [here](#).

Human Rights

Pantheon supports fair labor practices globally and does not tolerate any form of human rights violations. We take necessary measures to prevent human rights violations in our business and in our partners' businesses and commit to respect all human rights and applicable law.

We expect all Pantheors to actively support our programs and policies that are designed to do the following:

- Build a workplace free from discrimination and harassment;
- Prohibit child labor, forced labor, and human trafficking;
- Provide equity in pay, benefits, and other conditions of employment; and
- Provide a safe workplace.

Pantheors must report any violations they encounter so that Pantheon can take appropriate action.

Anti-Discrimination and Anti-Harassment

Pantheon strives to ensure that its workplaces (whether in-person or remote) allow our employees to bring their authentic selves to work each and every day. Pantheon employees may never discriminate against another employee or candidate based on a “protected category” in all aspects of employment, including hiring, training, compensation, firing, or any other decision relating to the terms and conditions of their candidacy or employment. Protected categories may include race, color, national origin, ancestry, sex, sex stereotyping, pregnancy, sexual orientation, gender, gender identity, transgender status, age, religion/creed, disability, medical condition, genetic information, citizenship status, marital or domestic partnership status, veteran or military status, or any other characteristic or status protected by federal, state or local law, regulation or ordinance.

Pantheon also prohibits harassment based on an employee's membership in a protected category. Harassment can include the following:

- Sexual harassment;
- Offensive language, jokes, and/or degrading comments;
- Racial, ethnic, gender, or religious slurs; and/or
- Intimidating or threatening behavior.

Anti-Bullying

Pantheon does not tolerate bullying behavior whether in person or online (cyberbullying). Even if the behavior does not rise to the level of harassment or discrimination, bullying is never acceptable, and Pantheon will take appropriate action to protect its employees. If a Pantheon employee is subjected to or sees others subjected to bullying, they must report this behavior.

Health and Safety

Pantheon's employees are central to the success of our organization, and the health, safety, and wellbeing of each and every Pantheon is front and center to our everyday operations. All Pantheons are expected to comply with our health and safety policies, and endeavor to create a safe work environment, whether working from a Pantheon office or elsewhere. If a Pantheon employee feels unsafe, they must speak up and report any concerns.

Drug and Alcohol Policy

To ensure the safety and wellbeing of our employees, Pantheon prohibits performing work while under the influence of alcohol, illegal drugs, and/or certain prescription drugs (including those that are unprescribed or being used in a manner that is inconsistent with a prescription). Pantheon also prohibits possessing, selling, transferring, or otherwise distributing illegal drugs or controlled substances while performing work for Pantheon.

Employees who are struggling with a drug or alcohol problem may contact the People Team to learn more about ways that Pantheon can help, including our Employee Assistance Program and Drug and Alcohol Rehabilitation Leave.

Anti-Violence

Pantheon has zero tolerance for violence in the workplace, which includes verbal assaults, physical threats, and/or any activity that would reasonably make another Pantheon feel unsafe. Pantheon also prohibits the possession of weapons in the workplace. Pantheon's zero tolerance policy applies not just to our employees, but to all third-parties with whom we do business. Pantheon has a Workplace Violence Prevention Plan (WVPP) applicable to employees who work from our headquarters in San Francisco.

Maintaining Accurate Books And Records

Pantheon strives to maintain accurate business records and to protect company funds and assets. Pantheon is committed to maintaining a system of internal controls that ensure compliance with applicable laws and regulations and promote the full, accurate, and timely disclosure of information in Pantheon's reporting to internal management, external auditors, and external parties including regulatory and governmental authorities.

Generally, all company financial reports, accounting records, commercial reports, risk reports, expense accounts, and other documents must accurately and clearly represent the relevant facts or the true nature of the transaction. Improper or fraudulent accounting, documentation or financial reporting are contrary to company policy and may also be in violation of applicable laws.

Company Records

In the normal course of work, employees will likely receive, create, and transact with company records. Employees are required to properly maintain these records, to ensure that they are properly filed, labeled, and that access is appropriately limited to those with a business need to access the records. It is the responsibility of all company employees to ensure that the company's records including documents, electronic information, and any other form of media are properly managed, handled, stored, and, where applicable, destroyed as appropriate in accordance with applicable management directives.

Financial Records and Reporting

Pantheon must maintain accurate financial records of its business transactions and must ensure proper reporting to auditors of its financial results. Financial records could include company-wide financial records, specific group-level transactions, as well as individual travel and expense reimbursement invoices. These and many other forms of

financial information must be managed properly and must be appropriately presented when requested. To the extent that employees create, handle, or are otherwise involved in the handling of financial records they must ensure that the records are accurate, properly maintained, and appropriately represented in internal and/or external financial disclosures. Employees are forbidden to use, authorize, or condone the use of “off-the-books” bookkeeping, secret accounts, un-recordable bank accounts, “slush” funds, falsified books, or any other devices that could be utilized to distort records or reports of the company’s true operating results and financial condition.

Market Practices

Anti-Corruption

Pantheors operate on principles of fairness and integrity. We invest energy into our business relationships while taking steps to ensure none of our interactions create even an appearance of impropriety.

- Pantheors will not participate in or otherwise offer, promise, or pay anything of value (cash, service or otherwise) to a non-US government office or public official designed to gain an improper advantage or benefit for Pantheon or a third party except as permitted by the US Foreign Corrupt Practices Act of 1977 (“FCPA”), the UK Bribery Act of 2010, or other similar laws in all places where Pantheon conducts business.
- However, caution is the best course of action. In application, the U.S. Securities and Exchange Commission and the U.S. Department of Justice are conducting enforcement actions against companies that provide anything of value to non-US government officials (interpreted broadly) or public officials (interpreted broadly) or employees of state-owned or controlled businesses (including schools, hospitals, energy companies and more) to gain an improper advantage or benefit for such companies or a third party. This includes facilitation payments, even though the FCPA statute permits facilitation payments.

- Before making any gesture, such as providing a customary gift or taking prospects who fall within the categories above to dinner, in the course of a relationship with a prospect or customer, and before paying fees to expedite processing of any government license or other right, contact legal@pantheon.io.
- Any violation of the above rules will subject employees to disciplinary action, which may include immediate termination of their employment relationship with Pantheon.

Business Gifts

Employees may not accept a cash gift or a gift with a value exceeding \$100 USD, or local equivalent, without approval from the General Counsel or their designee. Pantheon has implemented this rule to avoid the appearance of impropriety in its business dealings. For more information, please review Pantheon's [Anti-Corruption Policy](#).

Anti-Money Laundering

Pantheon only works with parties who obtain funds from legitimate activities. We apply controls to help ensure the businesses we work with are reputable and do not obtain money from criminal activities, which are then passed through Pantheon.

Securities Laws

Although Pantheon itself is not a "public" company, we may work with the information of many other companies that are publicly traded on a U.S. or foreign stock exchange. No Pantheon will buy or sell or otherwise facilitate others to trade a security based on material and non-public information. Any information that could affect the price of a security not published by that company or that a reasonable investor may rely on to decide whether to hold or sell that security is considered inside information, and trading on such information is prohibited by Pantheon and a violation of law.

Trade Compliance

Pantheon ensures compliance with global trade laws, including those that restrict where and with whom we have business, the movement of goods, technology, and

services, and where we can hire employees. Pantheon applies specific controls and processes to identify and prevent violations of trade compliance rules, including for the avoidance of business relationships with sanctioned parties around the world.

Any requests to participate in regulatory trade restrictions must be reviewed and approved in writing by Pantheon's General Counsel or their designee.

Antitrust and Fair Competition Laws

Pantheon will win in the market because we are the best - period. Pantheon will not engage in activities or enter agreements that discourage open and fair competition for employees, customers, and suppliers. Pantheon will not share confidential information with our competitors and will not accept their confidential information.

Our Business Practices

Privacy

Protecting the privacy of our employees, customers and partners is critical to Pantheon's operations. Pantheon employees may handle personal information in their role and are responsible for following all applicable laws and regulations, as well as all policies and procedures that protect that information. Personal information broadly includes information that identifies or relates to a specific individual. Pantheon employees must do the following:

- Only handle personal or sensitive information that they need and are authorized to access based on legitimate business reasons;
- Disclose personal information only to authorized individuals who have a legitimate business reason to have the information and are obligated to protect it;
- Securely store, transmit, and destroy personal information in accordance with Pantheon policies and applicable laws; and

- Report any actual or suspected violations of our privacy policies, actual or potential data breaches, or other risk to personal information to privacy@pantheon.io.

Pantheon will comply with applicable privacy laws and apply appropriate controls and policies necessary to meet the requirements of our business when collecting or processing personal information.

For more information about Pantheon's privacy practices and policies, click [here](#) to review the U.S. Privacy Policy and click [here](#) to review the U.K., EEA and Switzerland Privacy Policy.

If you have questions about appropriately handling personal information, contact privacy@pantheon.io.

Conflicts of Interest

Consistent with Pantheon's Conflicts of Interest Policy, all Pantheors must conduct themselves in such a way as to avoid actual or potential conflicts of interest. Examples of conflicts of interest include, but are not limited to, the following:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor or any entity that engages in business with Pantheon;
- Having any significant direct or indirect personal interest in a business transaction involving Pantheon;
- Conducting outside activities that materially detract from or interfere with the full and timely performance of any job duties for Pantheon; and/or
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on Pantheon or its business.

Outside employment or hiring a family member may also constitute a conflict of interest. All actual or potential conflicts of interest must be reviewed and approved, in writing, by Pantheon's General Counsel or their designee.

Communicating with the Public

Only certain employees are authorized to speak on behalf of Pantheon. If you have not been explicitly authorized to speak on behalf of Pantheon, you may not do so and must direct any requests from members of the press, investors or market analysts, or others seeking information about Pantheon to the VP of Communications, Chief Marketing Officer, or any member of the Executive Leadership Team. For more information, please see the [Speaking to Press Guidelines](#).

Protecting Pantheon Information and Assets

Pantheon Intellectual Property

Pantheon's intellectual property is core to our company's value proposition and critical to maintain our leadership in WebOps. Safeguarding our intellectual property is a priority in our business with customers and suppliers. All Pantheors must protect intellectual property and all Pantheon assets as a continuous priority.

Confidential and Proprietary Information

Confidential and proprietary information is a uniquely valuable asset to Pantheon and its business partners. All such information handled in the course of your work with Pantheon must be protected as confidential, used only as permitted by contract, policy, and law, and shared exclusively with those who have a need to know it to fulfill the permitted purpose. Pantheors must ensure that confidential and proprietary information is only being shared with external parties that have confidentiality obligations to Pantheon. Pantheors must also abide by any confidentiality agreements entered into by Pantheon.

Pantheors may come into contact with confidential and proprietary information of our customers and partners and have a similar responsibility for protecting that information just as if it were Pantheon's own information.

Security is a Shared Responsibility

If you become aware of an event that threatens to or becomes a physical safety event, security vulnerability, or suspected breach, you should immediately [contact incident@pantheon.io](mailto:incident@pantheon.io). Any sensitive information should be appropriately marked and protected in accordance with our policies. All access to information is only permitted with authorized technology and for business purposes. For more information, Pantheors should review our [Security Policies](#).

Community

Pantheon is an Engaged Community Organizer

We build a welcoming environment around empathy and constructive dialogue focused on respect for the individual. Our community strategy is designed to advance our open source programs and Pantheon's interests in our broader business ecosystem.

- Pantheon's community encourages transparency and integrity - By having conversations in the open, we build trust with our community. This trust provides us with better feedback from our customers and partners and strengthens our community relationships, which promotes an environment to win more business. Even challenging or critical conversations are valuable, though we do not tolerate harassment, bullying, or other personal attacks.
- Pantheon's community supports the open web - Our community supports open source projects, goes the extra mile to support our customers and partners, and increases engagement in our ecosystem. We help customers and partners build their skills and careers, and they help us build an amazing platform. Find out more [here](#).

Charitable Giving

Pantheon believes in supporting the person as a whole and for that reason gives employees the opportunity to support community organizations they care about through donation and volunteer hour matching. Specifically, Pantheon provides each full time employee through our Donation Matching program in Bright Funds, with up to \$500 in donation-matching funds per calendar year to eligible 501(c)(3) nonprofits or international charitable organizations up to a total of \$50,000 per year in matching funds.

Pantheon also makes direct donations to causes that make positive contributions to our society. Since its establishment, Pantheon has supported several initiatives and continuously strives to identify projects to support that promote its values and mission and ensure a free and open internet around the world.

Volunteering

Pantheon understands the value of our employees' time and the impact that each employee can make in their/our communities. Pantheon encourages employee volunteerism and donates \$15 per hour to each charity for which our employees volunteer.

Pantheon also provides volunteer opportunities for its employees, including remote opportunities. Pantheon has held remote volunteer opportunities where Pantheon employees volunteered on a number of projects, including helping women in underserved communities improve their employability, making simple recipe cards to guide people with disabilities, and helping to teach underserved youth how to code.

Environment & Sustainability

Pantheon promotes conservation and reduction of our impact on the environment across a number of initiatives seeded throughout our business, for example:

- **Minimizing Business Travel** - We maintain written policies and generally encourage all Pantheors to reserve travel for those instances where in-person presence would be necessary to achieve business objectives. Instead of travel, we actively promote the use of digital collaboration tools. Corporate events that require in-person attendance are organized to offer ride sharing and carpooling where possible.
- **Help reduce transportation carbon footprint** - To incentivize the use of environmentally friendly transportation, Pantheon supports employees' efforts to reduce their carbon footprints by providing bike parking and showers on site (US and Canada) , and through our commuter perk program for public transportation (pre tax dollars).
- **Cloud-first Infrastructure** - Pantheon's corporate technology runs on Google Cloud, which reduces both carbon emissions and centralizes energy use through shared deployment infrastructure.
- **Reducing Waste and Recycling Programs** - We provide recycling options in our office locations and take steps to encourage employees to reduce reliance on single-use products in favor of reusable products such as towels, dishes, cups among others. Moreover, Pantheon has established comprehensive recycling and composting in our US and Vancouver offices. Pantheon uses its partnership with LinkedIn Learning to promote education about efforts to reduce waste and improve recycling programs.
- **Commitment to low energy consumption** - Pantheon uses only LED lighting, Energy Star appliances, and building timers for our lighting.
- **Sustainability**. Pantheon supports sustainability initiatives, including planting more than 500 trees through Tree-Nation, an organization committed to planting one trillion trees by 2050.

Political Activities

Pantheon believes that an individual's political activities are highly personal and should not be swayed by any company statement or activity. Pantheon's communications on

issues of public concern are not intended to influence our employees to adopt certain ideas or causes. Employees are free to contribute their own time and money in support of their own personal and voluntary political activities. Employees may not engage in any political activity on behalf of Pantheon or use Pantheon funds for any political activity.

Conclusion

Success can be defined in many ways, and Pantheon strongly believes that it cannot achieve success without ethical and compliant business practices and operating in a way that improves our communities and the lives of people around us. By providing our employees this operating framework and options for *speaking up* when challenges arise, Pantheon supports an environment where employees are free to be themselves, feeling safe in the workplace and proud of their achievements.