

Twitter Supplier Code of Conduct

Twitter Inc. (“Twitter”) is committed to the highest standards of ethical conduct and social and environmental responsibility. Twitter depends on its Suppliers to be equally committed to conducting business with integrity and fairness and consistent with the highest ethical standards of corporate leadership and citizenship. Twitter’s suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for Twitter. Twitter requires its suppliers to become familiar with and operate in accordance with the principles in this Twitter Supplier Code of Conduct (“Supplier Code”) and in full compliance with all applicable laws and regulations. Likewise, suppliers are required to abide by the values and principles set forth in [Twitter’s Code of Business Conduct & Ethics](#).

This Supplier Code outlines the kind of conduct and behavior that Twitter requires of its Suppliers worldwide. Because we operate in many countries and are subject to different laws, customs and practices, the Supplier Code helps establish a common set of values and standards by which all Twitter Suppliers will abide regarding ethics, labor and human rights, health and safety, environmental protection, and management practices. These standards apply on premises or off-site or anywhere you are acting as a Supplier to Twitter.

This Supplier Code cannot possibly cover every situation or scenario that might raise an ethical concern. The Supplier Code does not take into account all local laws and legal requirements, where they are more restrictive, however, they take precedence. Suppliers are expected to exercise good judgment in all situations, and seek guidance as necessary, including from Twitter Source to Pay. You are required to read, understand, and comply with the Supplier Code, uphold these standards in day to day activities, participate in any required training on the Supplier Code, and obtain assistance if you are unsure how to resolve a concern, report any violations, and cooperate in any investigation.

Twitter will assess its suppliers’ compliance with the Supplier Code, and any violations of this Code may jeopardize the supplier’s business relationship with Twitter, up to and including termination. This Code applies to Twitter suppliers and their subsidiaries, affiliates, and subcontractors (each a “Supplier”) providing goods or services to Twitter, or for use in or with Twitter products.

Reporting Violations

Suppliers must report any violation or suspected violation of this Supplier Code of Conduct. Twitter’s efforts to ensure observance of and adherence to the goals and policies outlined in this Supplier code mandate that you promptly bring to the attention of Twitter’s Director of Source to Pay any material transaction, relationship, act, failure to act, occurrence, or practices that you believe, in good faith, is inconsistent with, in violation of, or reasonably could be expected to give rise to a violation of this Supplier code.

In the event you believe a violation of the Supplier Code, a violation of applicable laws and/or governmental regulations has occurred; you have observed or become aware of the conduct

which appears to be contrary to the Supplier Code; or you suspect, have or receive notice of a complaint or concern regarding Twitter's financial reporting obligations or disclosures, accounting practices, internal accounting controls, or auditing, you must immediately report the situation to Twitter at supplier-conduct@twitter.com or alternatively, notify Twitter through Twitter's Employee Hotline at (866) 859-7652 or ethicshelpline.twitter.com

When an alleged violation of the Supplier Code, applicable laws and/or government regulations is reported, Twitter will take appropriate action in accordance with the compliance procedures outlined in the Supplier code. Suppliers are required to cooperate in internal investigations of alleged misconduct or violations of the Supplier code or of applicable laws or regulations.

Consequences of Violating the Supplier Code

Twitter values honesty and integrity and expects all suppliers to comply with the spirit as well as the letter of this Code. Violation of the Supplier Code or any applicable law may result in immediate termination of your relationship and agreement with Twitter. Twitter's Source to Pay Team shall be responsible for determining whether to terminate the relationship. In addition to immediate termination of a Supplier relationship, Twitter will impose discipline, as appropriate, upon (i) any supervisor who directs or approve the Supplier's improper actions, or is aware of those actions but does not act appropriately to correct them; (ii) upon other individuals who fail to report known non-compliant conduct; and (iii) against employees who attempt to retaliate against a Supplier who reports an actual or potential violation of applicable laws or the Supplier Code. In addition to terminating the Supplier relationship, Twitter will bring any violations of law to the attention of appropriate law enforcement personnel.

Handling Proprietary and Confidential Information

In the course of your providing goods and/or services to Twitter, you may have access to Proprietary Information. Proprietary Information is Company Information not known to the public that may have intrinsic value or that may provide Twitter with a competitive advantage. It includes, for example, sales forecast, business, product or marketing plans, computer programs, software and other inventions or developments (regardless of the stage of development), customer lists, prospects, financial information, business practices and intellectual property. In the course of your provision of goods and/or services to Twitter, you might also have access to Confidential Information. Confidential Information is information that is not generally known to the public about Twitter its customers (including without limitation data that our customers upload into our service) employees or other parties with which the company has a relationship. The same information can be both confidential and proprietary. Confidential Information includes, for example, financial information, restructuring or reorganization plans, personal information, legally privileged communications and materials, securities issuance, buyback or tender plans, business plans and projections, and the existence and terms of agreements with customers or counterparties.

Proprietary and Confidential Information may be present in various media forms, including written documents, computer files, diskettes, audio and videotapes and oral communications.

Maintaining the confidentiality of this information is vital to Twitter's competitive position in the industry and, ultimately, to its ability to achieve financial success and stability. Suppliers must protect this information by safeguarding it, using it only for business needs and disclosing it only when authorized to do so and only to those who have a legitimate business need to know about it. Do not display, review or discuss Proprietary or Confidential Information in public places or in front of third parties. In addition, exercise care when sending or discussing Proprietary or Confidential Information on voicemail, electronic mail, fax machines or message services.

You should be aware that your duty of confidentiality applies during and even after your Supplier relationship with Twitter. You may not use or disclose such information for your own benefit or for the benefit of other customers, a new customer or prospective new customer.

Twitter will pursue legal remedies for any unauthorized disclosures of Proprietary and Confidential Information. You should report violations or suspected violations of this policy to Twitter's Director of Source to Pay.

Compliance

Ethics

Twitter expects the highest standards of ethical conduct in all of our endeavors. Supplier shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

Business Integrity, Bribery, Kickbacks and Improper Payments

Supplier shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Supplier shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and applicable international anti-corruption conventions.

Gifts, Gratuities and Favors

Twitter values transparency and the avoidance of conflicts of interest. While giving and receiving gifts may be intended to create marketing awareness and goodwill, they can create conflicts of interest or may appear to be intended to improperly influence the recipient.

In order to maintain the level of transparency we strive for without creating doubts about our intentions, gifts are generally discouraged and should never be offered if they are cash or a cash equivalent (including gift cards); they are of more than nominal value (e.g. over \$100); or they might create a conflict. Meals and entertainment are appropriate only if there is a

legitimate business purpose for the meeting, and the timing and value are not such that they would raise questions about the motivation behind it.

Financial Integrity, Records and Accounting

Accurate and reliable financial and business records are of critical importance. All entries in your accounting books and records related in any way to your provision of goods and/or services to Twitter must be true and accurate.

Accurate Representation

All statements, in whatever form, made about Twitter should be true and accurate, including with regard to the capabilities of Twitter's services or the ability of Twitter to provide a solution to a customer.

Disclosure of Information

Supplier shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties.

Protection of Intellectual Property

Supplier shall respect intellectual property rights and safeguard customer information. Supplier shall manage technology and know-how in a manner that protects intellectual property rights.

Whistleblower Protection and Anonymous Complaints

Supplier shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Supplier shall protect whistleblower confidentiality and prohibit retaliation.

Community Engagement

Supplier is encouraged to help foster social and economic development and contribute to the sustainability of the communities in which it operates.

Responsible Sourcing of Minerals

Supplier shall exercise due diligence, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, on its entire supply chain with respect to the sourcing of all tin, tantalum, tungsten, and gold contained in its products, to determine whether those metals are from the Democratic Republic of the Congo ("DRC") or any adjoining country and, if so, to determine whether those metals directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses in the DRC or an adjoining country. Countries that adjoin the DRC are Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Labor and Human Rights

Twitter believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and suppliers shall uphold the highest standards of human rights.

Antidiscrimination

Supplier shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices. Supplier shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety, and shall not improperly discriminate based on test results.

Anti-Harassment and Abuse

Supplier shall commit to a workplace free of harassment and abuse. Supplier shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

Prevention of Involuntary Labor and Human Trafficking

Supplier shall ensure that all work is voluntary. Supplier shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Supplier shall not withhold workers original government-issued identification and travel documents. Supplier shall ensure that workers contracts clearly convey the conditions of employment in a language understood by the workers. Supplier shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

Supplier shall ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and the law. Suppliers recruiting foreign contract workers either directly or through third party agencies shall be responsible for payment of all fees and expenses in excess of one month of the worker's anticipated net wages.

Prevention of Underage Labor

Supplier shall employ only workers who are at least 15 years of age, or the applicable minimum legal age, whichever is higher. Supplier may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

Juvenile Worker Protections

Supplier may employ juveniles who are older than the applicable legal minimum age but are younger than 18 years of age, provided they do not perform work that might jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138. Supplier shall not require juvenile workers to work overtime or perform night work.

Immigration Law and Compliance

All of Supplier's employees, including migrant and foreign workers, must be employed in full compliance with applicable immigration and labor laws.

Student Worker Protections

Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Supplier shall provide appropriate support and training to all student workers.

Working Hours

A workweek shall be restricted to 60 hours, including overtime, and workers shall take at least one day off every seven days except in emergencies or unusual situations. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

Wages and Benefits

Supplier shall ensure that all workers receive at least the legally mandated minimum wages and benefits. Supplier shall offer vacation time, leave periods, and time off for legally recognized holidays.

Supplier shall compensate workers for overtime hours at the legal premium rate. Supplier shall communicate pay structure and pay periods to all workers. Supplier shall pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure.

Freedom of Association and Collective Bargaining

As legally permitted, Supplier shall freely allow workers to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment. In the absence of formal representation, Supplier shall ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

Health and Safety

Worker health, safety, and well-being is important to Twitter. Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Occupational Health, Safety, and Hazard Prevention

Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, engineering controls, and/or administrative controls. Supplier shall provide workers with job-related, appropriately maintained personal protective equipment and instruction on its proper use.

Emergency Prevention, Preparedness, and Response

Supplier shall identify and assess potential emergency situations. For each situation, Supplier shall develop and implement emergency plans and response procedures that minimize harm to life, environment, and property.

To the extent that Supplier transports goods for Twitter into the United States, Supplier shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at www.cbp.gov (or other website established for such purpose by the U.S. government).

Incident Management

Supplier shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Supplier shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

Ergonomics

Supplier shall identify, evaluate, and control worker exposure to tasks that pose ergonomic risk such as excessive force, improper lifting positions, or repetitiveness. Supplier shall integrate this process into the qualification of all new or modified production lines, equipment, tools, and workstations.

Working and Living Conditions

Supplier shall provide workers with reasonably accessible and clean toilet facilities and potable water. Supplier-provided dining, food preparation, and storage facilities shall be sanitary. Worker dormitories provided by Supplier or a third-party shall be clean and safe and provide reasonable living space.

Health and Safety Communication

Supplier shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

Worker Health and Safety Committees

Supplier is encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input on, and participation in, health and safety issues in the workplace.

Environment

Twitter is committed to protecting the environment, and environmental responsibility is at the core of how we operate. Supplier shall develop, implement, and maintain environmentally responsible business practices.

Hazardous Substances

Supplier will identify and manage chemicals and other materials posing a hazard to human health, human safety or the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Wastewater and Solid Waste

Supplier will characterize, monitor, control and treat as required prior to discharge or disposal all wastewater and solid waste generated from operations, industrial processes and sanitation facilities.

Air Emissions Management

Supplier shall identify, manage, reduce, and responsibly control air emissions emanating from its operations that pose a hazard to the environment. Supplier shall conduct routine monitoring of the performance of its air emission control systems.

Boundary Noise

Supplier shall identify, control, monitor, and reduce noise generated by the facility that affects boundary noise levels.

Environmental Permits and Reporting

Supplier shall obtain, keep current, and comply with all required environmental permits. Supplier shall comply with the reporting requirements of applicable permits and regulations.

Pollution Prevention and Resource Reduction

Supplier shall reduce energy, water, and natural resource consumption by implementing conservation and substitution measures. Supplier shall minimize hazardous substances consumption by implementing reduction and substitution measures.

Management Commitment

Twitter believes that sound management systems and commitment are key to enriching the social and environmental well-being of our supply chain. Twitter holds our suppliers accountable to this Code and all of its standards. Supplier shall implement or maintain, as applicable, a management system that facilitates compliance with this Code and the law, identifies and mitigates related operational risks, and facilitates continuous improvement.

Company Statement

Supplier shall develop a company statement affirming its commitment to high standards of social and environmental responsibility, ethical conduct, and continuous improvement. Supplier shall post this statement in the primary local language at all of its facilities.

Management Accountability and Responsibility

Supplier shall identify company representatives responsible for ensuring implementation and periodic review of its management systems. Supplier shall have a Corporate Social Responsibility (CSR) or Sustainability representative that reports directly to executive management and has the responsibility and authority to manage social and environmental compliance requirements for the business.

Risk Assessment and Management

Supplier shall develop and maintain a process to identify labor and human rights, health and safety, environmental, business ethics, and legal compliance risks associated with its

operations; determine the relative significance of each risk; and implement appropriate procedures and controls to control the identified risks.

Performance Objectives with Implementation Plans and Measures

Supplier shall have written standards, performance objectives, targets, and implementation plans, including periodic assessments of the performance against those objectives.

Audits and Assessments

Supplier shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and next-tier suppliers to ensure compliance with this Code and the law.

Documentation and Records

Supplier shall have processes to identify, understand, and implement applicable laws and regulations and requirements of this Code. Suppliers shall maintain documents and records to ensure regulatory compliance.

Training and Communication

Supplier shall develop and maintain management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill Supplier's continuous improvement objectives.

Supplier shall have a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, next-tier supplier(s), and customers.

Supplier shall have an ongoing process to obtain feedback on its practices related to this Code and to foster continuous improvement.

Corrective Action Process

Supplier shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.