

# Code of Business Conduct and Ethics

## Fastly's Code of Business Conduct and Ethics

### Section 1: Welcome to Fastly

#### An Introduction to Our Business and Our Values

Our vision is to create a trustworthy internet — where good thrives. We like to think of ourselves as more than a technology company, because at the heart of our work we aim to improve people's lives.

Fastly enables the world's most popular digital businesses to deliver fast, secure, and scalable online experiences to their customers. Internet users around the world expect personalized, real-time digital experiences, and developers shouldn't have to choose between scale, security, and speed of delivery. Our edge cloud platform strategically moves data and applications closer to end users — improving the user experience, putting the power back in developers' hands, and enabling companies to focus on growing their businesses.

Our vision to create a trustworthy internet where good thrives guides everything we do. At our core, Fastly is curious, trustworthy, and transparent. We're competitive and act with passion. We always focus on our customers and operate with integrity. Simply said, we're just good people. These values are core to the culture of the company, the decisions we make, and the way we operate.



#### **We have a curious spirit**

Great ideas are born from an anything's possible mindset. We are constant learners who embrace diverse perspectives to solve challenging problems.



#### **We focus on our customer**

We, like you, want to build great things. We stay fervently attentive to our customers' challenges and center our work in their needs.



#### **We are trustworthy**

The trust of our customers and colleagues is a privilege. We honor that trust by putting privacy, reliability, and accountability first.



#### **We act with passion**

Enthusiasm reverberates throughout all we do — from what we build to who we hire to how we grow together as a team.



#### **We operate with integrity**

The right thing isn't always the easy thing. But we do it anyway, even when no one is watching.



#### **We are competitive**

We believe in ourselves and what we can achieve as a team — and we aren't afraid to celebrate where we shine.



#### **We embrace transparency**

We believe in honesty, even when the message is tough. Our customers, partners, and colleagues can rely on getting the information they need to make the best choices.



#### **We are good people**

At the heart of everything we do, we are good people. We act with empathy and kindness. We hold ourselves and the industry accountable to high standards, which helps us all grow together.

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Actions speak louder than words. While our business represents what we do and our values represent who we are, the following Code of Business Conduct and Ethics outlines how we behave.

## **Fastly's Code of Business Conduct and Ethics**

This document is an overview of the guiding principles we expect all of our employees to follow. It does not include every nitty-gritty legal detail or policy, but serves as a compass to keep us aligned with our ethics and values — and yes, with the law.

Our business rules are pretty intuitive and simple:

- If you think your actions might offend or negatively impact a colleague or a customer, don't act on them.
- If you're second-guessing something, don't guess — ask.
- If you make a mistake, report it honestly.

We can't predict the future and unforeseeable situations will probably take place. Ultimately, we trust you to exercise good judgment and make the right decisions. If you have any questions, get help. Talk to your manager, a People Partner, or a member of The Office of the General Counsel. We're here to guide and support you.

### **The Original Fastly Code of Conduct**

*The Fastly Code of Conduct is ten short statements that set out the expectations for how Fastly personnel work and represent Fastly. And while this [Code of Ethics and Business Conduct](#) is a fresh look for our conduct and ethical expectations, we think these ten statements are worthy of living on as one of our Company policies:*

1. We comply with all applicable laws and regulations
2. We provide a safe, welcoming, and productive working environment
3. We do not tolerate harassment
4. We are an equal opportunity employer and make our employment decisions based on performance, qualifications, abilities, and the needs of our business
5. We operate honestly, ethically, and transparently
6. We secure and protect our corporate and customer systems and information
7. We protect our intellectual property and we respect the proprietary rights of others
8. We communicate our policies clearly and provide training and support to enable easy compliance
9. We enforce our policies with appropriate discipline after thorough and discreet investigation
10. We protect those who raise concerns from retaliation

## **How we write policies at Fastly and where to find them**

We work hard to make sure our policies are written in a clear and concise manner. Our policies must also do all the things that good policies should, including pointing out standards or guidelines that should be subject to the policy, letting everyone know to whom the policy applies and who is responsible for it, when it was approved, and the last time it was reviewed, which should be annually. We train on all our policies regularly and make that training as accessible to Fastly personnel as possible.

Looking for additional context or more details? Fastly personnel can reference our full, unabridged policies in the Policy workspace in Confluence. For readers of this code, we've copied the policy principles from related Fastly policies into this document.

## **Why this code matters**

We take our company policies seriously because they keep our colleagues, customers, suppliers, and partners safe. That's why anyone who works for Fastly, or with Fastly, must follow our ethical and legal guidelines. This includes employees, contractors, consultants, partners, suppliers, agents, volunteers, and representatives.

At the heart of the matter, if you disregard or violate Fastly's policies, you could be putting the company, our employees and third parties with whom we do business at risk. Any violation will have serious consequences, including possible termination. Certain violations may even need to be handled by legal authorities for investigation and prosecution.

## **How to report an incident—without fear of retaliation**

If you see or hear about something that might be a violation of our Code and policies, or seems unethical or unlawful, please say something to your manager, a People Partner or a member of The Office of General Counsel, or report concerns anonymously at [fastly.ethicspoint.com](https://fastly.ethicspoint.com).

All reports, including those about executive team members, are taken seriously and will follow a chain of command. Each investigation starts with our most senior People Team officer or VP of People or The Office of the General Counsel, may be escalated to the Chief Executive Officer, and could end up with our Board of Directors or the Audit Committee if necessary.

If the action violates our policies, Fastly will decide the appropriate disciplinary measure — which can include actions as severe as a suspension, reduction of salary, demotion, or termination.

Speaking up shows that you care. Please know that we don't tolerate retaliation against anyone who reports a potential violation or raises a concern.

## **Policies, Reporting, and Non-Retaliation Policy - Principles**

1. It is not possible for policies and guidelines to address all expected behavior, actions or conduct in all situations, and when in doubt of the appropriate course of action, Fastly personnel should always use good judgment, comply with applicable law, act consistent with Fastly's Values and Code of Business Conduct and Ethics, and seek guidance in advance whenever possible.
2. Fastly personnel are obligated to promptly report actual or possible violations of law or Fastly policies, and to cooperate in any related investigation.
3. Fastly will promptly, thoroughly, and discreetly investigate all reports of significant policy violations.
4. Adverse action or retaliation against anyone who reports a violation or concern, assists another person in making a report, who cooperates in an investigation, or who files an administrative claim with any government agency is prohibited.
5. Violations of Fastly policies shall be subject to discipline based on the severity of the violation and related circumstances, and may also be referred to governmental authorities that may investigate and initiate civil or criminal proceedings.
6. Fastly policies must be under change control, approved by an executive officer and the Chief Legal Officer or other member of the Fastly Legal team as may be designated by the CEO from time to time and linked off the Policy homepage. Exceptions to policies may be granted by the executive officer responsible for the policy and the Chief Legal Officer or other member of the Fastly Legal team as may be designated by the CEO from time to time.

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## **Section II: Creating and maintaining a safe, fair work environment**

### **Respect for people and nondiscrimination**

We are an equal opportunity employer and make our employment decisions based on performance, merit, qualifications, abilities, the needs of our business, and other permissible non-discriminatory factors.

We have a zero tolerance policy for discrimination or harassment, and are committed to providing a safe work environment for all. This means no discrimination against applicants or employees based on race, color, religion, national origin, gender identity or expression, gender, sex, sexual orientation, age, pregnancy, disability, veteran status, marital or family status, or any other classification protected by applicable law. Fastly does not tolerate discriminatory remarks or jokes, verbal abuse, physical intimidation or violence, or any other behavior that may be associated with creating a hostile work environment. We do not tolerate unwelcome, unsolicited sexual advances or harassment against anyone.

## **Safe, Welcoming, and Productive Work Environment**

### **Policy - Principles**

1. Fastly provides a safe, welcoming, and productive work environment free of threatening behavior, or discrimination and harassment based upon a protected characteristic, where all individuals are treated with respect and dignity.
2. Fastly is an equal opportunity employer and all employment and advancement decisions will be based on individual performance, merit, qualifications and abilities, the needs of the business, and other permissible non-discriminatory factors, and not on any improper basis.
3. Fastly will make reasonable accommodations for all qualified employees or applicants with known disabilities, provided that the required accommodations will not impose an undue hardship on Fastly.
4. Fastly personnel must not conduct Fastly business while under the improper influence of alcohol or drugs or subject to other conditions which would impair an individual's ability to comply with this policy.
5. Fastly personnel must comply with this policy at all times while conducting Fastly business; while on Fastly premises, including corporate apartments; while interacting with other Fastly personnel, contractors, customers, vendors or any other person encountered in the course of conducting Fastly business at any location.
6. Any actual or suspected violation of this policy must be treated as a significant violation of Fastly policy and must be reported immediately according to, and handled by Fastly in compliance with, this policy and the [Policies, Reporting, and Non-Retaliation Policy \(POL 110\)](#).

### **Be fair, honest, and ethical—always**

No company has ever looked good by making another company look bad. Any competitive information we have is gathered ethically and legally. And we're always careful when engaging with competitors to avoid certain topics (like prices) that could violate anti-competition laws. At Fastly, we don't disparage our competitors.

This ethos extends across the board. Whether you're dealing with colleagues, customers, suppliers, partners or competitors, it's important to always be fair, honest, and ethical. This means no deception, misrepresentation, plagiarism, or manipulation of facts — from making false product and service statements to filing misleading financial documents.

Please contact The Office of The General Counsel if you have any doubts about the legality of claims.

### **Conflicts of interest**

As a Fastly employee, your loyalty should remain to the company. Conflicts of interest wedge themselves between your personal interests and your performance at the company. It only takes one person outside of Fastly to perceive a potential conflict, which could harm our reputation. Here are a few examples of conflicts of interest:

- Working at a company competitive to Fastly, or starting a company competitive to Fastly.
- Investing in a company that competes with Fastly (other than minimal stock investment in a public company).
- Hiring, employing, or selecting suppliers or contractors based on anything but their fit for the job and interest in Fastly. All of Fastly's purchases should be made on the basis of quality, suitability, service, price, and efficiency. We treat our suppliers fairly and equally and award contracts on the basis of merit and without favoritism.

It's your responsibility to report anything that might be perceived as a conflict of interest to our Office of the General Counsel (or if you're an executive, to the Board of Directors).

### **Giving and receiving gifts outside of Fastly**

Employees should use good judgment when receiving gifts from any third party (i.e., anyone outside of Fastly), or giving gifts to a third party. Accepting a meal, tickets to a sporting event, or a small token of appreciation are usually okay. But receiving these small gifts repeatedly, or any gifts of substantial value, may be perceived as bribery.

If a client or a vendor offers you a gift — or if you'd like to offer a gift — it's always best to speak with Fastly's Office of the General Counsel first. Gifts to or from government officials must always be approved by The Office of the General Counsel.

### **Conflicts of Interest Policy - Principles**

1. Use common sense and good judgment, adhere to high ethical standards and avoid situations that create an actual or potential conflict of interest
2. Employees are expected to devote their best efforts and attention to the full-time performance of their job and not to another business.
3. Engagement in potentially conflicting outside business activities must be approved.

## **Section III: How we operate globally**

### **Serving the best of the Internet**

The phrase "you're only as good as the company you keep" is a guiding principle. It speaks not just to the conduct and business ethics of Fastly's employees, it extends to our partners, contractors, vendors, customers and the internet. Doing what's right for our network and the brands that want to be there, benefits our employees, our customers, and the internet.

Just as we choose to work with individuals who are trustworthy, demonstrate integrity, and reflect our values, we choose to work with customers and partners that we believe have integrity, are trustworthy, and do not promote violence or hate, nor will we work with those who do so.

## **Community Guidelines Policy - Principles**

1. Fastly is committed to providing our services in compliance with all applicable laws, and we will neither do business where it is prohibited nor with prohibited parties.
2. We strive to maintain a network where reputable brands feel safe and in good company.
3. We choose to work with customers that we believe have integrity, are trustworthy, and do not promote violence or hate. We enforce and honor our [Acceptable Use Policy](#) and [Terms of Service](#) by following documented procedures for notice, suspension and termination of customers when appropriate.
4. Customers must accept responsibility for their content and engage appropriately with third parties that complain about their content, and we promptly inform our customers of third-party complaints we receive about their content.
5. We terminate repeat infringers of other's intellectual property rights when appropriate.

## **Global trade compliance**

Fastly is a global company, which means we need to comply with all U.S. and international trade laws.

Import/export laws are complex, vary across the globe, and sometimes require licenses — especially as they relate to products, information, or data moving from country to country.

If you're planning to send or receive data or information from countries outside of the U.S., please check with The Office of the General Counsel first. Please note that Fastly cannot conduct any business with Cuba, Iran, Syria, North Korea, Sudan, or the Crimea Region of Ukraine without obtaining approval from the Office of the General Counsel and likely the U.S. government.

## **Global operating laws**

Fastly is subject to antitrust or trade practice laws, which ensure fair trade, and remove restraints on the free movement of goods and services such as price fixing, discriminatory pricing, and certain tie-in sales.

We comply with the Export Administration Regulations ("**EAR**"), which restricts sending sensitive technology to foreign countries without permission.

We also comply with the regulations of the Office of Foreign Assets Control ("**OFAC**") of the Department of Treasury, which prohibits business dealings with international criminals and other sanctioned parties.

## Anti-bribery laws

Fastly doesn't tolerate bribery or corruption in any form or setting. Getting or giving "kickbacks" from outside agencies isn't worth sacrificing the trust we've earned among our colleagues and customers.

Fastly complies with all U.S. and international anti-bribery laws, including the Foreign Corrupt Practices Act ("**FCPA**"). The FCPA prohibits the bribery of government officials or individuals in the private sector to influence their actions or secure a commercial advantage — including promising or offering gifts or financial contributions. Even though the FCPA is a U.S. law, it applies to Fastly's actions everywhere.

As outlined in the section "Giving and receiving gifts outside of Fastly," there's sensitivity in regards to the exchange of gifts, meals, travel, and other benefits to foreign and U.S. government officials. Please reach out to the Office of the General Counsel if you have any questions or doubts.

### **Anti-Corruption Policy - Principles**

1. We comply with all applicable laws and regulations, and some of the most important are the U.S. Foreign Corrupt Practices Act ("**FCPA**"), the U.K. Bribery Act, and other anti-corruption and anti-bribery laws ("**Anti-Corruption Laws**").
2. We do not bribe anyone, including government officials. This means we do not, directly or indirectly, exchange anything of value with other persons to achieve an improper purpose related to Fastly's business.
3. We keep accurate books and records, we maintain and follow a system of effective financial controls, and we follow all procurement and expense policies and guidelines.
4. All interactions with local, state, federal and foreign governments, as well as known governmental subcontractors, must be approved and managed step-by-step with the Legal and Finance departments. This means all agreements with these entities or their personnel must be reviewed by the Office of the General Counsel and all documents and receipts for any expense related to these entities or their personnel, no matter how small, must be provided to Finance.

## Section IV: Taking Care of Fastly's Property

### **All Fastly money should have a paper trail**

Fastly's books and records should accurately reflect our transactions and expenses. Our accounting system must detail all financial transactions and internal accounting to protect from unauthorized payments. And our employees are required to be accurate and timely when submitting expense reports, purchase orders, and invoices. All public companies are required to comply with these accounting standards.



## Disclosing financial statements

Our trusted Senior Financial Officers are responsible for making sure our periodic reports and other public communications are accurate, understandable, and delivered on time.

### **Corporate Disclosure Policy - Principles**

1. The initial disclosure of material information by Fastly will generally be made only through press releases, SEC filings, or other means reasonably designed to provide broad, non-exclusionary distribution of the information to the public so that all members of the investing public will have an equal opportunity to simultaneously access the material information.
2. Rumors concerning the business and affairs of Fastly may circulate from time to time, and our general policy is not to comment on such rumors.
3. We will not confirm or update material information about us that has been previously disclosed to the public, except in a manner consistent with the procedures outlined in this policy.

## Spending Fastly money wisely

When you're spending Fastly's money, please remember that it affects the company at large. Theft, carelessness, and waste have a direct impact on our financial performance. Company spend must be for a legitimate business purpose—not for personal gain. For example, don't take the family to Paris on the company card. And don't keep the extra iPad that was supposed to be handed out at a marketing event. Purchases, especially of technology or services can impact different parts of our business, the promises we make to customers and our compliance with laws and regulations. Please follow our procurement processes so that the right company stakeholders are involved.

## Respecting data

We're proud of the industry-leading products we build at Fastly. But since they're our competitive advantage, we ask that you keep our private information private, and our trade secrets secret.

Everyone that provides services to us, including employees, contractors, suppliers, and partners, must agree to protect the personal, confidential and proprietary information that is ours and that is entrusted to us by third parties. In addition to this Code, these agreements and our policies provide much more detailed obligations. Some of these obligations, such as confidentiality and employee non-solicitation, continue on after your service ends. At the same time, we also expect Fastly personnel to honor the lawful obligations to their former employers or companies with which they were engaged, including confidentiality, non-solicitation, and non-competition obligations.

Some of the company information you handle on a day-to-day basis may be confidential or proprietary to Fastly. All emails, Slack messages, texts, voicemails, and other communications are confidential and should not be shared with outside folks, unless required for business reasons. All customer, partner, and supplier information is considered confidential information, too. We also honor the contractual commitments we make about the security of our platform and how we treat our customers' data.

If you need to share any of this information outside of the company, please consult with The Office of the General Counsel to draft the right agreement.

### **IP and Open Source Policy - Principles**

1. We independently develop new technology.
2. We believe in the value of open-source software and open industry standards.
3. We respect the intellectual property of others.
4. Work done by you relating to Fastly's business, during work hours, or on Fastly equipment belongs to Fastly.
5. Protection of Fastly intellectual property is vital to the interests and success of Fastly.

## **Insider Trading**

The bottom line on insider trading is that if you are aware of material nonpublic information about Fastly or another publicly traded company that Fastly has business relationships with and you trade in Fastly's or such other company's securities, you have broken the law. It does not matter whether the decision to buy or sell was influenced by the material nonpublic information, how many shares you buy or sell, or whether it has an effect on the stock price.

Regardless of who you are, if you know something material about the value of a security that not everyone knows and you trade (or convince someone else to trade) in that security, you may be found guilty of insider trading. If you are uncertain of whether information might be "material" or "nonpublic" do not hesitate to reach out to The Office of the General Counsel.

## **Insider Trading Policy - Principles**

1. Fastly personnel are responsible for understanding the obligations that come with having access to material nonpublic information and wanting to transact in Fastly securities.
2. Fastly personnel who are aware of material nonpublic information relating to Fastly may not engage in transactions in Fastly's securities except as permitted by this policy and applicable law.
3. Fastly personnel who are aware of material nonpublic information relating to Fastly may not recommend the purchase or sale of any Fastly's securities.
4. Fastly personnel may not disclose material nonpublic information to persons within Fastly whose jobs do not require them to have that information.
5. Fastly personnel may not disclose material nonpublic information outside of Fastly unless the disclosure is made in accordance with a specific Fastly policy that authorizes such disclosure.
6. Unless authorized by a Fastly policy and as required by their role at the company, Fastly personnel may not assist anyone engaged in transactions in Fastly securities, the recommendation to buy or sell Fastly securities, or the disclosure of material nonpublic information.

### **Use our technology with care and caution**

Remember that any Fastly-issued device is the property of Fastly — so is the information it contains. Even if you use your own device for Fastly work, all of the information pertaining to Fastly on that device is still owned by the company.

Because these devices can house sensitive and/or confidential information, please keep a close eye on them. Don't write your passwords on a sticky note, don't leave your backpack under a restaurant table, and don't use your computer for personal reasons that you wouldn't want made public — from messages to your family, to medical information, to pornographic material.

If you lose a Fastly-issued device, please make sure to promptly report it to your manager and file a ticket with IT.

## **Data Governance Policy - Principles**

The Data Governance Policy (“Policy”) defines the foundational program components and objectives all Fastly employees (i.e., Fastlyans) must adhere to in order to:

1. Establish the appropriate governance structure and improve data management practices with Fastly;
2. Improve data quality by protecting and maintaining the integrity, availability, confidentiality, security, and usability of data held and entrusted to Fastly;
3. Honor the contractual commitments made to meet the customer expectations for information entrusted to Fastly;
4. Assist Fastly in operationalizing consistent compliance and privacy considerations;
5. Ensure all Fastlyans demonstrate, understand, and adopt data governance requirements and expectations.

### **Leave the corporate communication to the pros**

Feeling proud of Fastly and want to share it with the world? We love your enthusiasm for the business. But most of our communications with the financial community, media, and the general public should come from our Corporate Communications team to ensure effective and accurate representation of the company. If there’s a company announcement you’d like to share with the public, we’ve outlined messaging guidance in our External Communications policy.

## **External Communications Policy - Principles**

1. Fastlyans create brilliant work and content.
2. We adhere to these guiding principles in our efforts to amplify the business, grow brand awareness, and increase visibility in relevant and interesting industry and community spaces.
3. We use external communications to create advocates, not adversaries.
4. We should always be respectful and uphold Fastly's values when engaging in external conversations, published work, speaking engagements, social media, and other external channels.
5. Confidential information must not be discussed in external channels.
6. Fastly does not tolerate any form of plagiarism. Source citations and consent from people in photos are fundamental expectations.

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## **Section V: Closing**

**This code may change, and parts may be waived, but we’ll keep you in the loop**

Any substantive amendment or waiver of this code must be approved in writing by the Board. Non-substantive changes may be approved by Fastly's Chief Legal Officer or other member of the Fastly Legal Team as may be designated by the CEO from time to time. If approved, this modification will be disclosed to stockholders as required by the rules of any stock exchange. You can always find the most current version of the Code at [investors.fastly.com](https://investors.fastly.com). Our policies themselves must be updated according to our Policies, Reporting, and Non-Retaliation Policy.

## **Thanks for reading**

This is a lot of information, but we think it's important to have it all in one place for easy reference.

Thanks for taking the time to read through it. And if you still have questions, please don't hesitate to reach out to The Office of General Counsel at [gc@fastly.com](mailto:gc@fastly.com).