

OPTIMIZEZY EMPLOYEE CODE OF CONDUCT

Optimizely's Employee Code of Conduct ("Code") has been created to help you understand our core values and the behaviors expected to support them. The Code is not intended to reduce or limit any obligations you may have to Optimizely. The standards outlined in the Code should be viewed as the minimum standard owed to Optimizely by its directors, officers and employees in conducting business on behalf of Optimizely.

As a global business we operate in a complex network of law, regulation and policy. Local laws or policies always prevail when they are stricter than this Code. If you are in any doubt about the meaning or applicability of a rule or regulation, please seek advice from your manager or local HR team.

Every Optimizely employee worldwide must comply with our Code. You must make time to read and understand this document. If you have any questions, or need advice please speak to your local HR team. This Code is subject to update by Optimizely from time to time.

I. OPTIMIZEZY'S VALUES

Be bold, be humble.

We proudly push boundaries, both our own and our customers, but at the end of the day, we're people. We know every ambition has its challenges.

- We're open to vulnerability.
- Don't assume we're smarter than others or have all the answers.
- Set high goals, but also admit your limitations.
- Thank the entire company in every win, not just sales since no one could do it alone.
- Courageously voice ideas that may seem 'out there'.
- Always listen to understand.

Put the customer first, always.

We set goals and focus on the 'so what' of every action. It's all about the ongoing impact that we make, for customers and for ourselves.

- Seek to understand our customers and their pain points.
- Respond quickly to customer communications.
- Tie our business outcomes to the success of our customers.
- Know what value our products bring to our customers.
- Celebrate our customers' successes.

Get the job done together.

Teamwork is how we work. It starts with a "yes, how can I help", rather than with a "no, it is not possible" attitude.

- Create a clear roadmap for all our products.
- Practice, reward and recognize people for good and respectful communication.
- Build trust by getting to know each other so you can reach out when you need help.
- More celebrations!

Embrace diversity and inclusion.

We actively incorporate a diversity of perspectives as a crucial way of driving innovation for ourselves and the communities we serve.

- Reflect the diversity of our community in our communications, both for customers and talent outreach.
- Hire people from different backgrounds for the same team.
- Give time and space for people to speak up, not just in English.
- Create opportunities to meet colleagues from different countries and departments.
- Develop inclusive benefits, policies and learning opportunities.

Focus on continuous improvement.

We relentlessly seek better ways of doing things, for ourselves and our customers. Testing new ways of doing things – regardless of success or failure - is a form of learning.

- Foster ideation, brainstorming and hackathon sessions.
- Experiment in how we approach problems and try to get better outcomes each time.
- Choose to commit to our new vision.
- Don't just let change happen but be part of the change and input opinions.
- Lead with optimism- it's contagious.

II. APPROPRIATE CONDUCT.

Conflicts of Interest

A conflict of interest occurs when an employee's personal or business interests interferes with their duties to Optimizely or their ability to act in Optimizely's best interests. It is our responsibility to manage conflicts responsibly and honor our commitments to Optimizely. Conflicts of interest can fall under the following categories:

- External employment;
- External projects;
- External ownership;
- Personal relationships.

Every situation will be different and there will be many factors to consider for directors, officers, employees. Before engaging in any external activity, reach out to your local HR team. You should keep in mind the following points:

- If you are engaged in any external activity that could pose an actual or perceived conflict of interest, you need to raise the matter with your local HR contact and disclose it to Optimizely.
- Please report any conflict of interest – not just your own personal conflicts, but any perceived conflicts by others, including management.
- Actual or potential conflicts of interest involving a director or executive officer should be disclosed directly to the Head of Compliance. Any actual or potential conflicts of interest involving the Head of Compliance should be disclosed directly to the CFO.

Employees owe Optimizely a duty to advance its business interests when the opportunity arises. We are prohibited from:

- Diverting opportunities discovered as a result of your job with Optimizely or through use of Optimizely's property or information (unless such opportunity has been presented to and rejected by Optimizely);
- Using Optimizely's information or property or your role for improper personal gain;
- Competing with Optimizely.

Fair Dealing

What we say is important. Our goal should be to deal honestly, ethically and fairly with customers, partners, suppliers and even competitors. Statements regarding Optimizely's services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of any party through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practices.

Gifts, Travel and Entertainment

Maintaining high quality professional relationships with our clients and candidates is essential to the success of our business. Sometimes we provide or receive business courtesies, such as reasonable entertainment and modest gifts. However, we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised. Check with your local HR contact before incurring business meals and entertainment expenses to help ensure the activity clearly benefits Optimizely and furthers our mission.

Privacy

Optimizely is responsible for ensuring privacy, confidentiality and controlled access to all customer and employee information. We have an important duty to respect this information and ensure it is protected and handled responsibly and only used for the purposes for which it is provided. We take our obligations under data protection and privacy laws across the world very seriously. Almost every country in the world has local data protection laws that must be considered.

Anti-bribery Laws

At Optimizely, we do not give bribes and we do not accept bribes. It is very simple. We expect all employees, directors and officers to comply with all laws, rules and regulations – including all those applicable to wherever Optimizely does business.

Side Agreements and Improper Payments

Optimizely does not permit, condone or allow kickbacks or any other improper payments, transfers or consideration. No employee, director or officer should offer, give, solicit or receive any money or other items of value for the purpose of obtaining, retaining, or directing business or receiving any kind of favorable treatment.

Books and Records

All Optimizely books, records and accounts need to be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions that are recorded. The financial statements of the company need to conform to applicable accounting rules and principles and policies. No false or misleading entries may be made in Optimizely's books or records for any reason, and no disbursement of funds or any other company property may be made without adequate supporting documentation.

Company Assets

We each have a duty to look after and respect all Optimizely's assets – including our place of work, computer and telephone, finances or supplies you may have access to and even our working time. We should protect Optimizely's assets from misuse, theft and waste. We must also ensure other companies cannot gain an unfair advantage by accessing important information about our business.

Integrity

Integrity is key to our future success. From working together in meetings to the development of new products, operating with integrity will lead to the right decisions at the right time.

Fairness

We want everyone at Optimizely to be treated fairly and we will strive to ensure that all Optimizely policies and procedures are applied consistently across the board.

Respect

We must treat people both inside and outside of Optimizely with respect, honesty and kindness. To be treated fairly, we will strive to ensure that all Optimizely policies and procedures are applied consistently across the board. Optimizely hires employees based on merit and qualification. Optimizely prohibits discrimination, harassment and bullying.

Be safe

Optimizely is committed to providing a safe and healthy workplace that is free of violence, safe and considers the health needs of our workforce. Threats, intimidation, or violence toward anyone at work are not tolerated. We require our employees to never work impaired by drugs, alcohol or any other substances.

Speak Up

It takes courage to speak up – this is why we take concerns seriously and do our best to maintain fairness, transparency, and the privacy of all parties involved. You do not need to have all the details or even be certain – if you have concerns about violations of any rules or laws related to this Code, please speak up! Optimizely has zero tolerance for retaliation. Anyone who retaliates against an employee for raising a concern in good faith or participating in an investigation will be subject to disciplinary action, potentially including termination.

Confidentiality

We must maintain the confidentiality of information entrusted to us by Optimizely or by any third party on a confidential basis. Unauthorized disclosure of any confidential information is strictly prohibited. Employees should take appropriate precautions to ensure that no confidential information (including sensitive business information) is communicated within our company, except to those employees who have a need to know the information to perform their roles and responsibilities. Employees should also abide by any lawful obligations to prior employers, including restrictions on the use and disclosure of confidential information, solicitation of former colleagues and non-competition obligations.

Intellectual property

Optimizely's intellectual property rights (e.g., trademarks, logos, copyrights, trade secrets, "know-how", patents, etc.) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value. You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. We strongly encourage you to report any suspected misuse of trademarks, logos, or other Optimizely intellectual property to Legal.

Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Optimizely and you to criminal and civil fines and penalties. Please seek advice from Legal before you solicit, accept, or use proprietary information from individuals outside the company or let them use or have access to Optimizely proprietary information. You should also check with Legal if developing a product using content that does not belong to Optimizely.

Social Media

When we communicate with external audiences, it is important that our communications are accurate, consistent, timely and conform to the highest standards of quality and trust. Ultimately, you bear sole responsibility for what you post online. Before creating online content, consider the risks and rewards involved. Be aware that any conduct adversely affecting your performance or adversely affecting your colleagues, customers, suppliers or any other relevant third parties may result in disciplinary action, including termination.

III. COMPLIANCE WITH THE CODE AND ANONYMITY

Compliance with the Code

We are all responsible for complying with the Code. Disciplinary measures for violations of the Code are determined by Optimizely in its sole discretion and may include, without limitation, counselling, reprimands, warnings, probation, suspension without pay, demotions, reductions in salary (or commissions or bonuses), termination of employment and restitution. Disciplinary measures may be combined and may or may not occur in every circumstance.

Investigations

During any investigation, Optimizely will try to determine if misconduct has occurred, will respond in a timely manner and make changes or recommendations. To the extent possible, we will try to keep investigations and reports confidential and provide a fair process to anyone accused of misconduct. During your employment, you may at some time be asked to assist with an investigation. In such cases, you are expected to cooperate. You are not permitted to interfere, provide false information, influence others, or alter or destroy records. Any refusal to participate in an investigation or any attempts to deliberately provide false or misleading information or deliberately omit relevant information may result in disciplinary action, including termination of employment.

Anonymity

When reporting suspected violations of the Code, Optimizely prefers that you identify yourself in order to facilitate our ability to take appropriate steps to address the report, including conducting any appropriate investigation. However, we also recognize that some people may feel more comfortable reporting a suspected violation anonymously. If you wish to remain anonymous, you may do so, and we will use reasonable efforts to protect your confidentiality subject to applicable law, rules, or regulation or to any applicable legal proceedings. However, in the event the report is made anonymously, we may not have sufficient information to look into or otherwise investigate or evaluate the allegations in a complete manner. In any case, we ask that you provide as much detail as possible to permit Optimizely to evaluate the report fully, and, if appropriate, commence and conduct an investigation.