

# **Our Code of Conduct**

How we  
do business.

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**Start here.**

# Actions

# > Words

**Welcome to our Code of Conduct.**

Why a Code of Conduct? Any group of people, when they get together to pursue a goal, have to agree how they're going to behave and what their obligations are to each other. That's what we're doing with this Code of Conduct.

# What you can expect from us. And what we expect from you. (Yep, we're in this together.)

This Code of Conduct describes our responsibilities and obligations as a company and as WeTransfer's employees.

Although it's not a guide to all employees' rights and responsibilities (go to the [Employee Handbook](#) for that), it can be seen as a guide to how we behave. We have set out what responsibilities and obligations mean for different groups. Most are for us and our people but there are some actions for advertisers and users too.

Now, we can't describe or anticipate every possible scenario you'll encounter (though we think we've covered the most common ones). So we begin by setting out our principles and standards as a company. Then we've summarized our particular policies for different aspects of work life, and what each one means for you. There are links to the full policy documents if you need to check the ins and outs and the details. At the end you'll find some quizzes and checklists so you see how well you've been paying attention!

Our customers, the communities in which we work, and people considering joining us, all notice how we behave. So it's vital you read this Code so that you know what we – and they – expect of you.

**Legit, solid,  
straight-up principles.**

# Business. It's a people thing.

**Sure, we're a technology company.** Yes, creativity is incredibly important to us. But what really floats our boat? It's people.

When we talk about business, what we mean is people and we don't just mean those we work with at WeTransfer. We also mean everyone else who our company touches: our partners, our advertisers and the communities we are part of.

So we conduct our business with empathy. In everything we do, we strive to have a positive impact on people. And, because people live on this delicate, wonderful thing called planet Earth, we also strive to have a positive impact on the planet too.

How do we do all that? By having clear business principles to guide us...

# We deal in big ideas.

We believe creative thinking changes the world for the better, which is why our mission is to help people bring ideas to life.

Good ideas deserve good company. As a Certified B Corporation, we strive to use our business as a force for positive change. From campaigning on issues like net neutrality and mental health, to wiping out \$30 million of medical debt for those in need, we're committed to building a better internet and a better world for everyone. Maybe that's why Fast Company calls us one of the ten most innovative social good companies.

#### **What gets us out of bed in the morning?**

We create beautifully obvious tools to move ideas.

Our tools allow creative professionals to collaborate and co-create along the whole creative process, as simply and as intuitively as possible. Our business and products span three of the world's most dynamic sectors: tech, editorial, and advertising.



# What B Corp businesses believe. Including us.

## **People, planet and profit**

At WeTransfer we've always used our platform to bring about positive change and support causes we care about. In 2020, we joined the B Corp movement – a global movement of organizations that balance people, planet and profit to use business as a force for good.

## **Five impact areas**

We had to earn our certification: it required passing an assessment that covered five different impact areas – environment, workers, community, customers and governance. What's important is that B Corps don't just say they're making a difference, they're verified to do so. And they need to improve over time to keep their certification valid.

## **B Corp commitments**

We're in business to help people and have a positive impact on the world around us, and those who we come in contact with. B Corp helps us do just that.

So we're committed to the following B Corp principles:

- We have an obligation to contribute our share of taxes.
- We operate in compliance with all local and national laws and regulations, including the Foreign Corrupt Practices Act from the US.
- We understand that laws change over time.
- We will follow the law and the recommendations made by the B Lab Standards on how business can be a force for good in society.

## **Being transparent**

We want to achieve excellence in each of the five impact areas. And we promise to be open about how we're doing along the way.

Certified B Corporations must also complete a Disclosure Questionnaire (so, of course, we completed one too!). This process helps to identify potentially sensitive issues related to the company (such as historical fines, sanctions, material litigation, or sensitive industry practices).

## **So what's a B Corp anyway?**

Society's most challenging problems can't be solved by governments and non-profits alone. Businesses must play their part too – and that's where B Corps come in. B Corps are companies that harness the power of business to make a positive impact on the world – balancing people, planet and profit. Think Patagonia, Ben & Jerry's and Tony's Chocolonely.

What's important is that B Corps don't just say they're making a difference: the difference achieved is verified. To become a B Corp, businesses have to – in the words of the B Corp movement – “meet the highest standards of verified social and environmental performance, public transparency, and legal accountability”. They also must amend their legal governing documents to require their board of directors to balance profit and purpose.



**Our obligations,  
responsibilities and  
commitments towards  
each other.**

**Our people and those  
who freelance for us:**

**External stakeholders:**

# Our people and those who freelance for us: **Individuals**

# How to behave.

## Hint: be thoughtful and considerate.

### Our commitment to our employees

We're in business for the people – working with great people, providing services that help people, and doing things that help improve the world a bit for people. Human-centric, that's us. So we strive to provide a work culture that's collegial, respectful, diverse, inclusive, productive and safe. Supporting physical health and mental wellbeing? Yep. Providing organized activities, access to resources and policies that encourage flexibility? You bet. We're dedicated to doing everything we can to make sure that this is one big, happy, fun and inspiring place to work.

**Never**  
Accept a gift or entertainment invitation if you feel it could be seen as excessive or create a conflict of interest.

**Always**  
Treat everyone with dignity, care and respect. Be polite and professional and never intimidate, harass or abuse. Assume good intent.

**Never**  
Discuss work-related legal matters or sensitive information, even if it's a personal comment, unless you are WeTransfer's official spokesperson.

**Always**  
Notify your manager immediately if you suspect bribery is occurring or have a bad feeling about something.

**Always**  
Let your manager know if you start a relationship with a colleague or with an advertiser or one of our business partners. We're not nosy, we just need to avoid any conflict of interest or unfair advantage.

**Always**  
Take proper consideration and care of other people's lives, privacy, and points of view when you post or speak.

**Always**  
Respect copyright, confidentiality agreements, and local laws.

**Never**  
Act in a way that is intimidating, humiliating or harmful to others.

**Never**  
Keep the existence of any romantic relationship with any other co-worker or client quiet if you are a managerial position.

# We expect our colleagues to interact with each other in a polite and professional manner.

## **Be kind.**

### **Our Harmful Behavior policy**

We all have the right not to be subjected to aggressive, abusive or offensive language or behavior, regardless of the circumstances. So we expect our colleagues to interact with each other in a polite and professional manner.

We all also have the right to work in an environment that is free from intimidation, harassment, bullying, sexual harassment and abuse. In general, harmful behavior constitutes any action which causes (physical or psychological) pain or harm to someone else. So always be polite, kind and professional and avoid causing physical or psychological discomfort or harm to others.

Both intentional and unintentional actions are considered, as either can quickly become a harmful pattern of behavior.

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**i** Read the full policy here:  
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## **Love actually.**

### **Our Employee Dating & Personal Relations policy**

Sometimes people fall in love with each other. It's a beautiful thing. What you do in private in your own time is nothing to do with us. But to stop it creating problems within the workplace, you need to let your supervisor know about relationships with people at work or clients, as they could create conflicts of interest.

Any supervisor, manager, executive, board member or person in an otherwise sensitive or influential position must disclose the existence of any romantic relationship with any other co-worker or client.

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**i** Read the full policy here:  
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#### **How to report unacceptable behavior**

1. Talk to your manager.
2. Talk to HR.
3. If you don't feel comfortable reaching out to your manager or HR, talk to our internal or external trust counselors (more info [here](#)).

#### **Key contact**

If you have any issues, questions or would like more information relating to WeTransfer employees and freelancers, please contact the HR team: [hr-team@wetransfer.com](mailto:hr-team@wetransfer.com)

# We want you to conduct business fairly and professionally.

## **Think before you post.**

### **Our Social Media and Public Speaking guidelines**

At WeTransfer, we give you lots of access to confidential information. We trust you. We're like that. But we do need you to treat the information as, you know, confidential. It's important that you do not make anything public that is included in that confidentiality clause of our contracts.

Which brings us to sharing stuff on social media, which is about as public as it gets. Please use your common sense on social media or in any other communication that is public, like speeches or interviews. Your actions, even in your personal time and away from work, may be perceived as actions or views of the company.

WeTransferians are proudly defined by diversity. So we should make sure that what we choose to communicate shows proper consideration and care of other people's lives, privacy and points of view. WeTransfer has a global presence so it's important to be mindful of what we share, particularly if traveling or working abroad.

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**i** Read the full policy here:  
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## **Gift or bribe?**

### **Our Gifts & Anti-Bribery policy**

We want you to conduct business fairly and professionally. So all forms of bribery are strictly prohibited. But what you might not know is that giving or accepting gifts (including hospitality and entertainment freebies) is also seen as a way of influencing someone and the decisions they make.

We're not saying you have to say "no" to all gifts. Giving or receiving a gift can be a nice way to say "thank you". However, if not handled properly, the exchange of gifts and entertainment may appear to create a conflict of interest. This is especially true if it happens frequently, or if the value is large enough that someone might think it can improperly influence a business decision.

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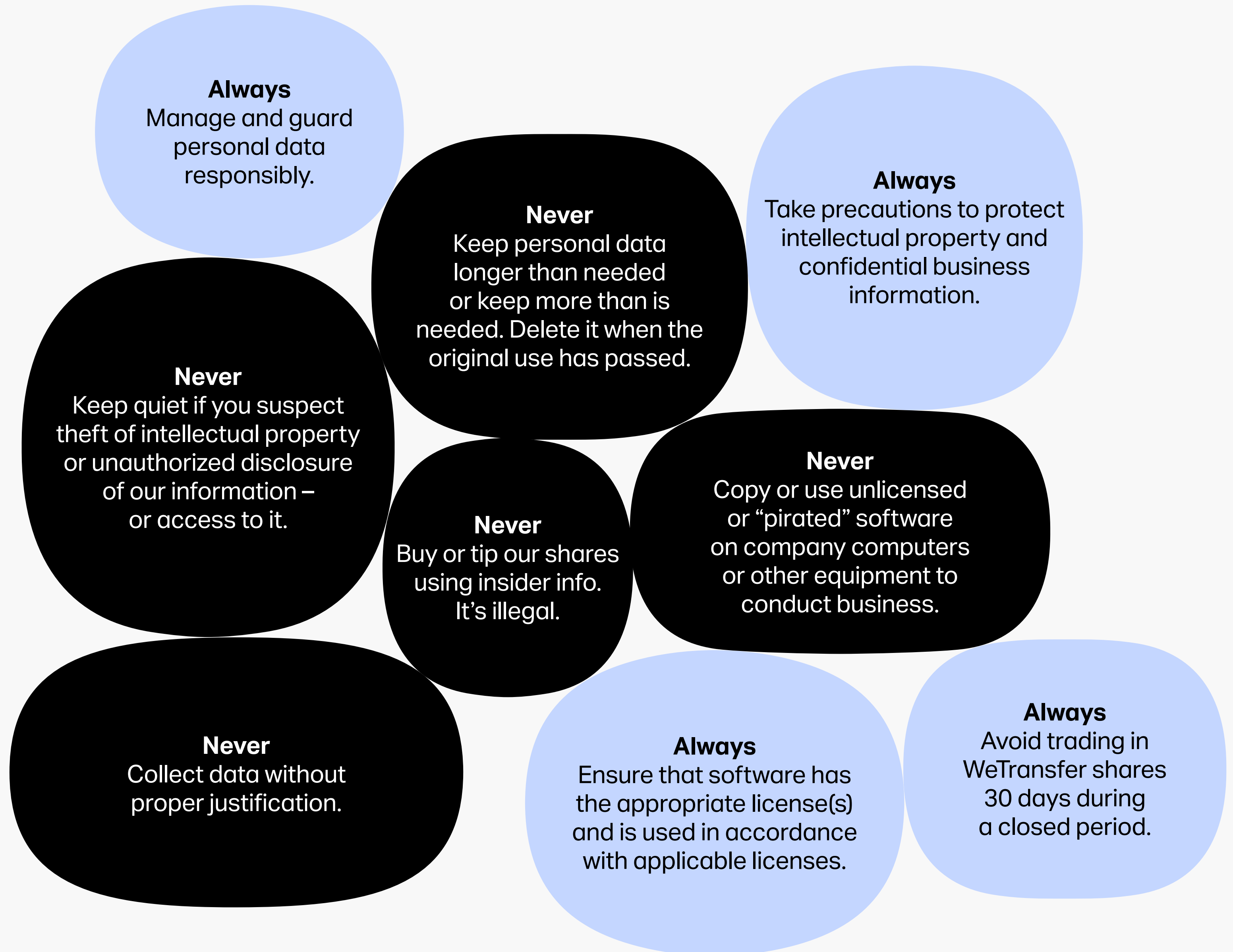
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# How to do the right thing when it comes to things and data.

## Our commitment on data

We are committed to secure our products, protect our employees and our company, and protect our users, keeping data private and protecting it from breaches.

WeTransfer is all about making creativity easier for you and millions of people around the world. We do our best to respect your ideas, privacy, and workflow, and in return we expect you to act with common decency when you use our tools.





# We are against piracy of any kind.

## **Insider trading.**

### **Insider Trading policy**

Insider trading is when you buy or sell WeTransfer shares because you know something that could affect the share price but that information hasn't been made public. Tipping someone else off using this confidential information is also considered insider trading. Both are illegal.

To keep things simple, we have a rule that you are not allowed to buy or sell WeTransfer shares within 30 calendar days prior to the publication of any financial update, or any special event-driven closed period which may be imposed. During any closed period share trades will be blocked in the Global Share tool. The policy applies to everyone employed by WeTransfer as well as independent contractors.

There are additional rules that only apply to members of the managing and supervisory boards and the senior leadership team. You can also turn to the Compliance Officer assisted by the Legal Department when in doubt whether a prohibition or obligation applies. WeTransfer employees, at all times, remain fully responsible for compliance with the policy and the law.

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**i** Read the full policy here:  
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## **We pay for stuff.**

### **Our Software Management & Piracy policy**

People who create things – whether that's art, music or software – have been our key users since day one. They have helped us get where we are today. We're grateful for that. So we are against piracy of any kind. When using design tools or password management software or suchlike, please check you are using a licensed version. We pay for what we use because we respect those who made it. Please make sure you do the same.

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**i** Read the full policy here:  
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## **Keeping data secure.**

### **Our Information Security policy**

Every company faces security threats which are evolving constantly. Requirements set forth by regulations, such as the GDPR, are becoming more complex and demanding. At WeTransfer, we also see an increasing demand for answers to regulatory questions asked by businesses that want to use our products within their company and need to comply with certain regulations. We have specific policies for a range of situations, from password setting to information classification and protection, retention and destruction.

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**i** Read the full policy here:  
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## **Your data is your life.**

### **Our Privacy policy**

Personal data are valuable assets that need to be managed and guarded properly to preserve the trust of our users and employees, and to comply with applicable laws and regulations. This internal Privacy policy governs how we handle and protect personal data. This policy aims to:

- set a baseline for the fair collection and use of personal data within WeTransfer;
- lay the foundation for an environment in which every employee and freelancer is aware of the importance of privacy;
- point out the general responsibilities of employees and freelancers with regards to the fair use of personal data; and
- comply with relevant data protection laws, such as GDPR, ePrivacy and CCPA.

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**i** Read the full policy here:  
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#### **Key contact**

Our Compliance Officer has the specific dates for the 30-day closed periods. If you have any questions regarding insider trading, please contact our Compliance Officer: [trading@wetransfer.com](mailto:trading@wetransfer.com)

# Our people and those who freelance for us: **Workplace**

# A safe place to work.

## **Our commitment to the workplace**

Our workplace will be a safe place for diverse voices, where anyone can be heard, regardless of their gender identity, sexual orientation, religion, ethnicity, age or disability status. Everyone should be comfortable and safe. We will provide an ergonomically responsible workspace (or a budget for one), both in the office and at home. And, yes, we will ensure people who work for us have the right IT equipment for their role.

**Always**  
Complete your Harassment & Discrimination Prevention training.

**Always**  
Expect ergonomic and comfortable working conditions when in our offices or working from home.

**Always**  
Speak up if you see something wrong or anything suspicious.

**Never**  
Fail to complete the Sexual Harassment training courses: mandatory for new hires in the US; recommended for everyone elsewhere via our Learning and Development tool.

**Never**  
Feel you can't report something. If you can't tell your manager, let our internal trust counselor know. We won't retaliate.

**Always**  
Expect comfort, a safe environment, both physically and psychologically, and refreshments when you come to work at a WeTransfer office.

**Never**  
Accept poor broadband if you're working from home. You get an allowance for home working, part of which is meant for an internet subscription with plenty of bandwidth to support things like video-conferencing and to avoid performance issues or connection failures.

# We want everyone to feel safe and comfortable at work.

## Speak up.

### **Our Whistleblower policy**

WeTransfer firmly believes in doing the right thing. So, if you, as an employee, intern or independent contractor, suspect any wrongdoing, please report it to a manager, trust counselor, HR manager, member of the senior leadership team (SLT) or board, or the appropriate government or law enforcement agency. We will follow up on all reported incidents.

We will not tolerate any retaliation against an employee reporting an incident or giving feedback. This is a safe environment for everyone to speak up. This means you will be protected from suspension or termination, no matter the outcome of the investigation, as long as you didn't make up your allegation.

People make mistakes and incidents happen. With all the laws, regulations and business principles, it isn't always clear what the right thing to do is. We see these incidents as an opportunity for us to learn and improve, but we can only do something if we know about it. That's why it is important to speak up.

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**i** Read the full policy here:  
**link here**

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## Staying safe.

### **Our Safety policy**

Here at WeTransfer we want every employee to feel safe and comfortable at work. In compliance with state legislation, WeTransfer requires all US employees to complete Harassment & Discrimination Prevention training, and we will roll this training out to all employees. This not only raises awareness, it also provides insight on how to identify and report workplace misconduct.

Our aim is to create a safe work environment for all employees. We want to foster an inclusive culture as well as identifying bias in the workplace and best practices to avoid bias. So, during the first week of employment, as part of onboarding, all employees complete Sexual Harassment training.

Plans are being prepared for earthquake safety, tornado safety and first aid certification, to name just a few. And, if you have any suggestions, please let us know! We all own safety.

In our Amsterdam office, we have specialized employees (BHV or 'bedrijfs hulpverlening' in Dutch- recognized by yellow jackets on their chairs) who have been trained to act in case of emergencies.

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**i** Read the full policy here:  
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## Get comfy. Work safely.

### **Our Responsible Workspaces guide**

Everyone has a right to work in an environment that is ergonomic, is adaptable to their physical needs (some people like to stand at a desk) and is equipped with well-specified IT, whether they're in one of our offices or working from home. So we provide adjustable work furniture in our offices and advice for setting up at home. And everyone gets a laptop and IT tools, so they can work comfortably.

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**i** Read the full policy here:  
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### **Key contact**

If you have any issues, questions or would like more information relating to the workplace, please contact Facilities or HR.

# Our people and those who freelance for us: **Environment**

# Our planet. Let's look after it.

## Our commitment to the environment

We have always prioritized empathy and community but it's important that we extend those values to the whole planet. We believe companies must play their part in achieving the aims of The Paris Agreement. Here's what that means for us.

In June 2020, we decided to embark on our sustainability journey, making a pledge to be environmentally responsible. We're working hard to minimize our negative impact on the environment. Having already achieved Climate Neutral certification, we have made it a target to cut our emissions by an ambitious 30% by 2025.

To achieve that goal we are looking at offsetting our emissions by investing in the highest standard of offset programs. But we recognize that offsetting is not enough. In the future we will need to actively remove carbon dioxide from the atmosphere and become carbon negative, and climate positive.

We'll publish our progress in our annual [Responsible Business Report](#) and keep sharing news on our own platforms too.

**Always**  
Consider how you can reduce harm to the environment when at work. Can you avoid printing documents? Can you find a greener way to commute? Can you cut back on your business travel?

**Never**  
Print out multiple copies of documents before people specifically ask for hard copies.

**Always**  
Seek out bio-based, non-toxic, non-hazardous products, and those with high recycled content, that are locally sourced or derived from renewable energy.

**Never**  
Overlook opportunities to support suppliers who implement sustainable environmental and social practices.

**Always**  
Be proactive. Look for ways that we can minimize waste, energy and the use of natural resources.

**Never**  
Buy paper with less than 30% post-consumer recycled content, processed with chlorine or its derivatives and not FSC approved.

**Always**  
Procure products and services thoughtfully. Think local, think recycled and think about the environment when buying products.

# We're working hard to minimize our negative impact on the environment.

## Key contact

If you have any issues, questions or would like more information relating to WeTransfer's environmental efforts, please contact our Social Responsibility team:  
[responsibility@wetransfer.com](mailto:responsibility@wetransfer.com)

## Carbon negative. Planet positive.

### Our Environmental Purchasing policy

The goods and services that WeTransfer purchases on an annual basis have both environmental and social impacts. We recognize that we can use our purchasing power to support local suppliers and help build a sustainable economy. So we aim to do just that.

This policy aims to increase the company's use and procurement of local, recycled and environmentally preferable products. The practices it outlines will also help us address the sustainability of our supply chain and the communication of environmental practices to customers.

Preference should be given to purchasing products or services containing post-consumer recycled content or products and services that are environmentally preferable to alternatives. Environmentally preferable products are generally durable, repairable, reusable or recyclable. They have a minimum level of packaging, toxic content or chemical hazard potential.



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**i** Read the full policy here:  
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## Think before you buy.

### Our Purchasing policy

Thoughtful “preferred purchasing” supports the procurement of energy-efficient and water-efficient products, such as products and services derived from renewable energy, bio-based products, non-toxic and non-hazardous products, high recycled-content materials, services that support diversity, locally sourced products and services, and contracts with suppliers who implement sustainable environmental and social practices.

These principles should be applied to all our purchases including paper for office use, cleaning supplies, food and drinks for company functions, merchandising and packaging materials, and all outside vendor purchases. They are meant to be overarching principles that guide purchasing decisions and help evaluate alternative product and service procurement.

Part of our “thoughtful and preferred purchasing” guidelines are that WeTransfer should, as far as feasible, give preference to locally and sustainably produced goods and services over those produced more distantly.

At times a local alternative may not be available either at the quality or cost we need. We should then focus our more distant purchases on sustainable supply chains while ensuring that local communities benefit.

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**i** Read the full policy here:  
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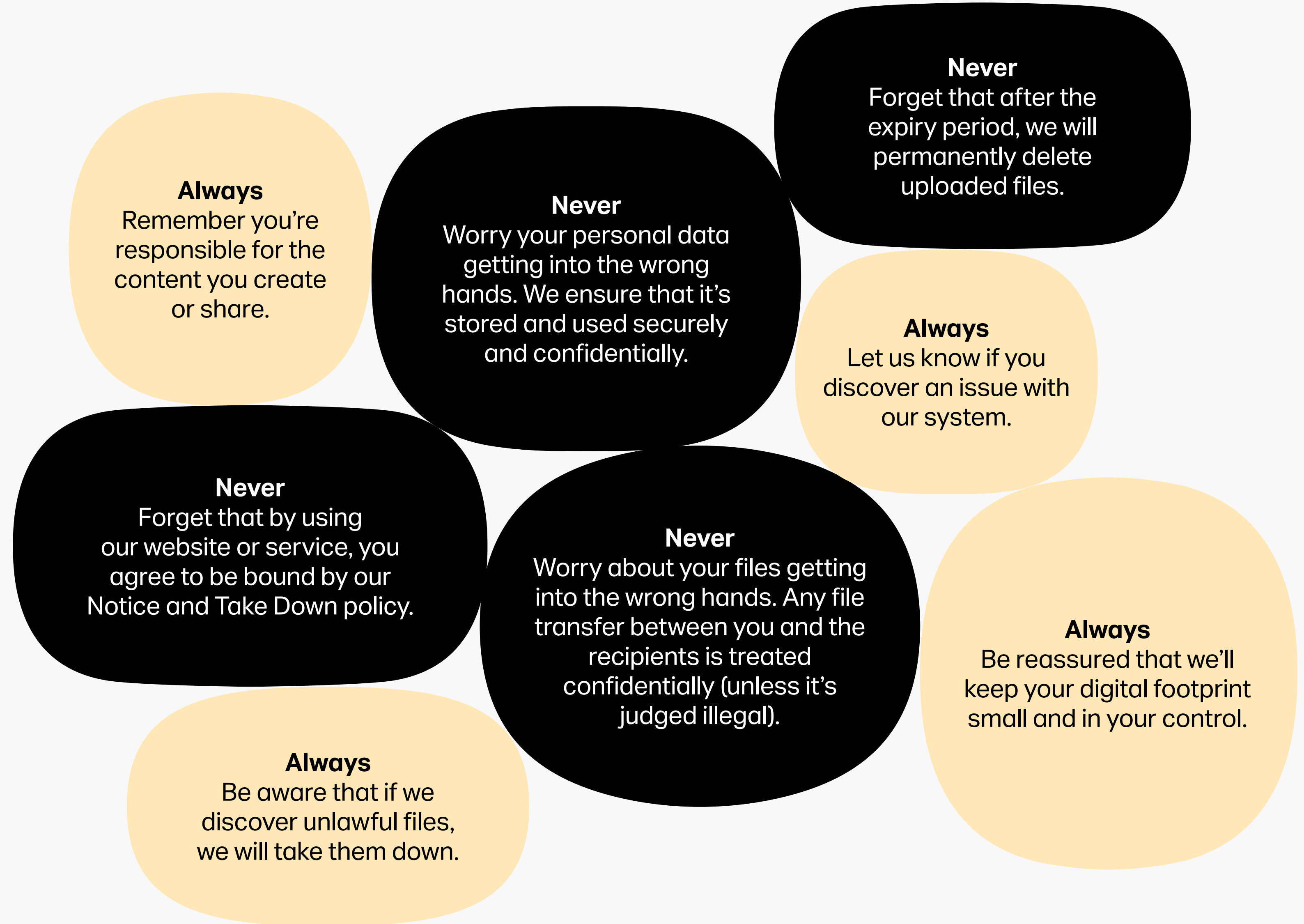
# External stakeholders: **Users**



# User responsibilities. And ours.

## **Our commitment to our users**

Technology should encourage creativity, not distract from it. So, when it comes to developing our products, we've always put the people who use our tools first. We owe it to our community of users to ensure our platform is safe and secure, and to protect their privacy and data. We're also committed to improving product accessibility. Our aim? To ensure that as many people as possible can use all of this wonderful stuff we offer in their creative pursuits.



**You do what you do. We'll help you do it.**

**Terms of Service (T&Cs)**

We've summed up our Terms of Service in a few simple sentences. They don't replace the official legal stuff, but they give users an idea of what's in there.

Here are the headlines (imagine them with a clock bonging in the background if you like):

- You have to be 16 or over to use our tools.
- Your content is yours – you own it, and you are responsible for it. We'll only do what's needed for our services to work properly...
- ... unless you are doing something illegal, in which case we can block and/or delete your stuff and suspend your accounts.
- We may make changes to our terms, service and/or fees from time to time. If you have an account and don't like something we change, you can always cancel at any time.
- And we should mention that you use our services at your own risk; we are not liable for any damages if things go wrong.

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**i** Read the full policy here:  
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**If it breaks the law, we take it down.**

**Our Notice and Take Down policy**

WeTransfer respects your rights and expects you to respect the rights of others. In the unfortunate event that WeTransfer finds or is notified of unlawful files or content being distributed through its service, we will follow the procedures described in our Notice and Take Down policy.

By using our website or file transfer service, users agree to be bound by our Notice and Take Down policy.

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**i** Read the full policy here:  
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**It's the user's data. So we look after it carefully.**

**Our Privacy & Cookie statement**

Since day one, WeTransfer has cared about privacy and respecting our users. Protecting the data of our users is of the highest importance to us, and we go to great lengths to make sure we keep it safe.

We take your trust and right to privacy seriously. So we work continuously to keep your digital footprint small and in your control. Nevertheless, to enable you in your flow and to improve and secure our service, we need to process some personal information.

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**i** Read the full policy here:  
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**If we fall over, let us know.**

**Our Responsible Disclosure policy**

At WeTransfer, we consider the security of our systems – and our users – a top priority. But no matter how much effort we put into system security, there can still be vulnerabilities present. If you discover a vulnerability, we would like to know about it so we can take steps to address it as quickly as possible.

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**i** Read the full policy here:  
**link here**

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# We work continuously to keep your digital footprint small and in your control.

**To report a security glitch**

Submit your findings by using our [Responsible Disclosure Form](#) hosted by Zerocopter.

**Key contact**

For privacy-related questions, please reach out to our Data Protection Officer:  
[dpo@wetransfer.com](mailto:dpo@wetransfer.com)

# External stakeholders: **Advertisers**

# Responsible advertising.

## **Our commitment to advertisers**

We've staked out a premium space that puts brands and messages in front of the world's most influential audiences, with an experience they won't forget. So it's really important for us to be able to decide which companies we work with – we want to feel good about what we are selling.

We're continuing to improve and develop ways to choose our partners, with the aim of developing relationships with business partners who share similar values and principles to us. But we also recognise that not everyone is as far down the responsible business journey as we are.

Being a responsible tech company is about inspiring positive systemic change and this isn't something we can achieve alone. We want everyone we work with – including our advertisers and media agencies – to join us on this journey.

As a Certified B Corporation, we recognize our obligations to all who have a stake in our success, including advertisers. That's why we use the [standard terms and conditions for digital advertising](#) from the Interactive Advertising Bureau (IAB Terms), together with a (limited) set of [WeTransfer terms and conditions](#). We use the IAB Terms as they are seen as best practice in the digital advertising industry and aim to provide a fair framework for the parties involved.

**Always**  
Comply with the IAB Terms for digital advertising and with a (limited) set of WeTransfer terms and conditions.

**Never**  
Offend our users. We don't allow obscene language or the promotion of pornography, violence or the use of firearms.

**Never**  
Do anything detrimental to our users, clients, employees, shareholders and suppliers. We have obligations to them we need you to keep.

**Always**  
Maintain the highest standards of e-conduct.

# We think it's important to decide who we work with, and feel good about what we are selling.

## To report a Code contravention

If you see advertising on WeTransfer that contravenes our Code of Conduct, or if you are concerned material you are preparing might contravene the Code and want to check, report it to: [ads@wetransfer.com](mailto:ads@wetransfer.com)

## Key contact

If you have any issues, questions or would like more information relating to how we work with advertisers, please contact: [ads@wetransfer.com](mailto:ads@wetransfer.com)

## Our Code is your Code.

### Our Advertisers Code of Conduct

As a values-driven business, and a Certified B Corporation, we are committed to acting responsibly in all aspects of our business and maintaining the highest standards of environmental, social and corporate governance. So we have minimum standards we follow. We expect (actually, we insist) that our advertising and our business partners follow these standards too.

Advertisers have to recognize our obligations and agree to not act detrimentally to these. They also have to comply with the Interactive Advertising Bureau (IAB Terms) and our terms and conditions. These prohibit certain content including pornography, violence, the use of firearms and obscene language.

Advertisements, or content linked to them, must also avoid the following:

- Infringement of intellectual property.
- “Hate speech”.
- Factual inaccuracies or misleading information.
- Damaging the reputation of WeTransfer or any of its brands.
- Exposure to any malware.
- Infringement of our Notice and Take Down policy.
- Anything obscene, defamatory, libelous, or unlawful.
- Violent or sexual content or anything that is abusive in nature and likely to cause offense.

We reserve the right to remove content that we judge contravenes this Code. We also expect advertisers to uphold certain basic social standards in the way they go about their business. Specifically, we will only do business with companies that:

- Offer workplaces that are safe for diverse voices.
- Respect confidentiality agreements and prohibit insider trading.
- Protect data in line with national laws.
- Do not give or accept bribes.
- Prohibit personal or family conflicts of interest.
- Strive to make a positive contribution to society and the environment.
- Support employee development.

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 Read the full policy here: [link here](#)

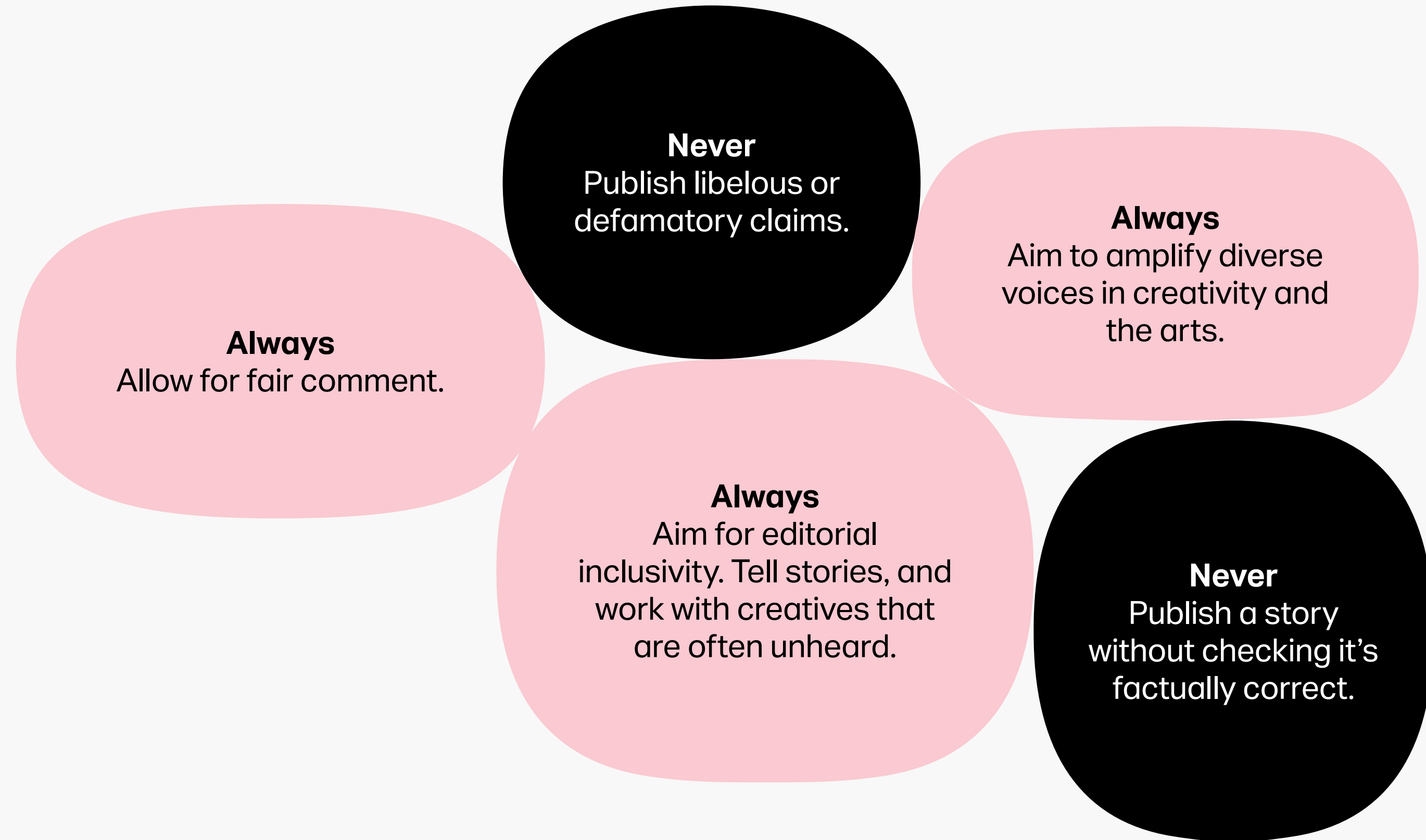
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# External stakeholders: **Creatives**

# It's all about making creativity easier.

## Our commitment to creatives

We will defend the space for creative work. We will support artists we believe in. We will especially amplify the voices of creatives and artists from underrepresented groups because we are committed to promoting diversity and inclusion.



**Creativity? We love it.**

**Ethical Storytelling guidelines**

We believe creative thinking is the driving force for humankind and have always been committed to supporting creative communities. That's why we give away up to 30% of our advertising space to artists we admire and causes that are important to us.

Diversity is at the center of what we do. We want to tell stories across different communities – whether that's age, race, geography, gender, or sexuality. Put simply, more voices equal better ideas.

We will expand our public research initiatives to continue to provide insights to creatives, students, policymakers and academia around creativity and creative culture. We will start to monitor and report on the impact of our social partnerships campaigns. And we will double down on our support for creatives, especially the younger generation of artists.

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**i** Read the full policy here:  
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**We give away  
up to 30% of  
our advertising  
space to artists  
we admire.**

Want to know how we select creatives to support? Here are some insights into our curation criteria:

**Curation meetings**

After every curation meeting, we should:

- Rule 1: Walk away with one artist from each continent.
- Rule 2: Feature work from across the gender and non-binary spectrum aiming for a representative balance. That means the people we commission to make work as well as the artists we feature.
- Rule 3: Choose work based on certain criteria. Among other things: is it inspiring? Is it enabling?

**How to get sign off**

Final sign off lies with the editor-in-chief but in instances that a company sense check is required, they may consult with the CCO and Director of Communications to ensure that work aligns with overarching company values.

**Key contact**

If you have any issues, questions or would like more information relating to how we support creatives, please contact: The Editorial Team:  
[editorial@wetransfer.com](mailto:editorial@wetransfer.com)



# External stakeholders: **Communities**

# Communities... We support you!

## Our commitment to communities

When you believe that creativity has the power to change the world, which we certainly do, you proudly support creative causes you care about. That's what we've been doing ever since we were founded. To date, every year, we've donated up to 30% of our advertising space to artists and causes. And we'll continue to do just that, as well as running twice-yearly, measurable, global campaigns that focus on supporting underrepresented communities.



# Creativity is at the core of our existence, our users, our tools and our storytelling.

## How to propose an initiative

Submit proposals or ideas for consideration by our business unit or the senior leadership team (SLT).

## Key contact

If you have any issues, questions or would like more information relating to how we work with communities, please contact Public Relations: [pr@wetransfer.com](mailto:pr@wetransfer.com)

## Giving back.

### Our Community Support Focus guidelines

We want to leave a positive impact on our communities by using our platform, skill, time and talent to make a positive impact through community involvement. Our business decisions are based on adding value to the people we serve: our users, community and the people around us.

Between 2018 and 2020, we partnered with more than 170 non-profit organizations and have raised more than \$30 million in crowd philanthropy efforts, including c.\$500,000 donations in financial support for artists and creators, and to education and community partnerships that are building a strong creative community.

Creativity is the umbrella – everything we support comes under it. Creativity is at the core of our existence, our users, our tools, our storytelling. We have supported creatives since day one. In everything we do, we should try to find that link to creativity to make it truly “us”.

---

**i** Read the full policy here:  
**link here**

---

# Test yourself.

**Here are five activities relating to our policies.** (You can also undertake our training modules which can be found [here](#)).

## Task 1

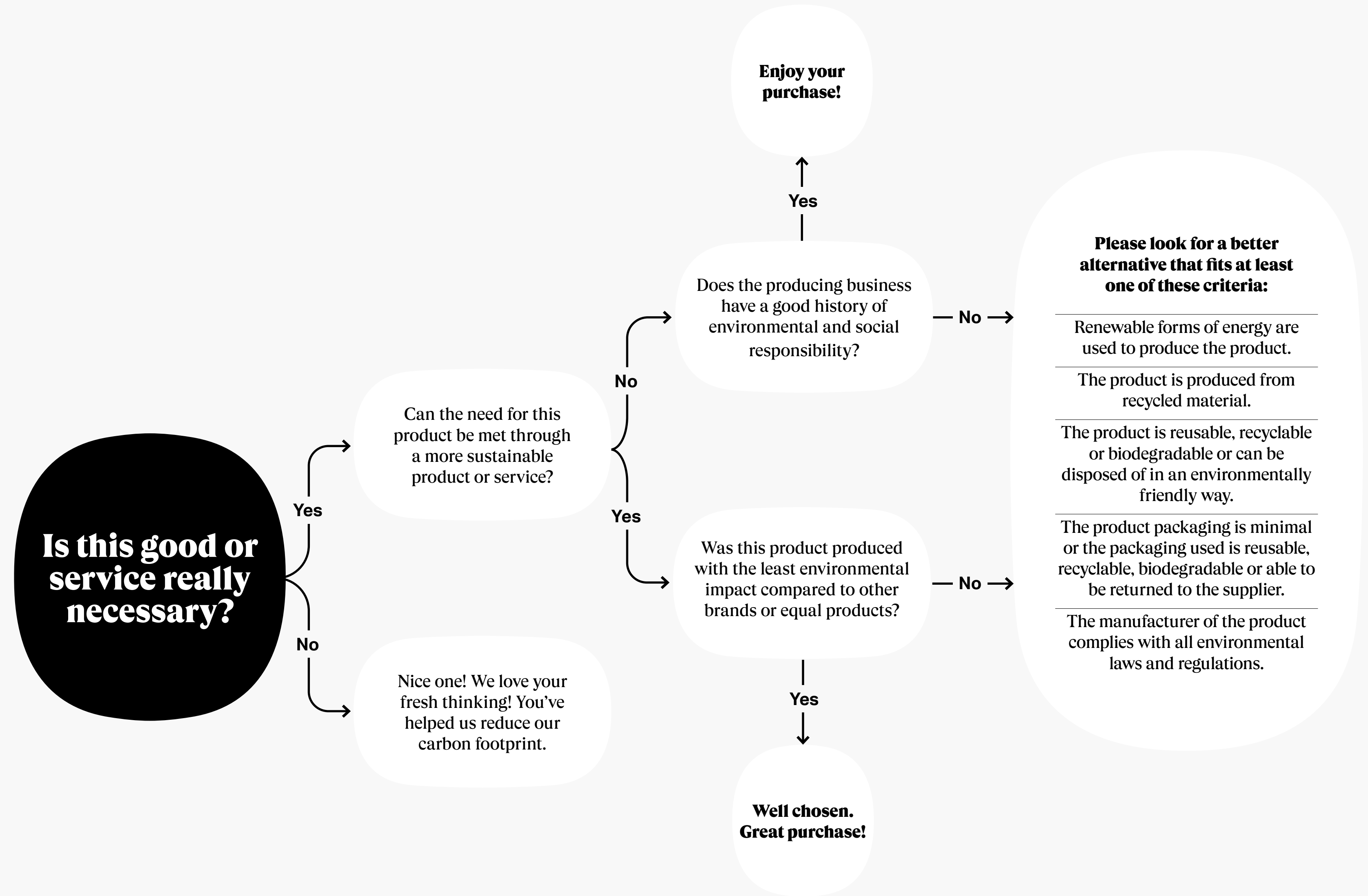
### Policy quiz

# To buy or not to buy?

Making stuff, packing it, moving it about, using it and then recycling it... It all uses up a lot of energy and resources. Services consume resources too.

Here are some questions to ask yourself before you next make a purchase.

There are exceptions to every rule. We live in an imperfect world and there are moments when making a sustainable purchase isn't an option. We don't want you to have to shoulder this decision alone. If you follow the purchasing tree and the outcome is that purchasing an item – or working with a supplier is needed and business critical even though they don't meet our criteria – then please escalate the decision to the SLT.



## Task 2

Security policy quiz

# Know how to keep things secure?

Choose what you would do in each of the following situations from the options provided...

---

**i** Roll over the boxes to see the correct answer, or if you're reading a printed version, go to [page 47](#) for the answer.

---

Oops! I've lost my laptop.

**a.**

Nothing. It'll probably be fine.  
There's not much recent  
stuff on it.

**b.**

Ring round some contacts to let  
them know, just in case they get  
any strange calls or emails.

## Task 2

### Security policy quiz

# Know how to keep things secure?

Choose what you would do in each of the following situations from the options provided...

---

**i** Roll over the boxes to see the correct answer, or if you're reading a printed version, go to [page 47](#) for the answer.

---

## I think I got hacked!

**a.**

Change passwords on the device you think's been hacked. And change passwords on anything that uses a similar password. If you use the affected account to log into anything else, change its password too.

**c.**

Check your outgoing communications for anything unusual or you don't remember sending. Check your filter or preferences and make sure nothing's been set to do something you don't want.

**d.**

If you're seeing something odd on the network (on the server, on slack or on wetransfer.com...) but not on something you own – tell IT Services. It's probably nothing but it's better to be safe than sorry.

**e.**

If something strange happened to you digitally, try to save anything that might tell us more about what happened.

## Task 2

Security policy quiz

# Know how to keep things secure?

Choose what you would do in each of the following situations from the options provided...

---

**i** Roll over the boxes to see the correct answer, or if you're reading a printed version, go to [page 47](#) for the answer.

---

My team wants to buy a new tool.

**a.**

Jump on Google and buy the first thing that looks good.

**b.**

Ask around colleagues for recommendations.



## **Task 2**

Security policy quiz

# Know how to **keep things** **secure?**

Choose what you would do in each of the following situations from the options provided...

---

**i** Roll over the boxes to see the correct answer, or if you're reading a printed version, go to [page 47](#) for the answer.

---

Which of these three things  
will make my data more secure?

### Task 3

#### Privacy policy quiz

# Spot the odd one out.

One of the options is incorrect in each list.  
Can you spot which one it is?

---

**i** Roll over the boxes to see the correct answer, or if you're reading a printed version, go to [page 47](#) for the answer.

---

#### 1. What are we all responsible for?

---

- a. Fair and legitimate use of the personal data of individuals.

---

- b. Protecting personal data.

---

- d. Complying with data privacy laws.

---

- e. Demonstrating compliance.

#### 2. When I or my team wants to cooperate with a third party and to process personal data, I need:

---

- a. A Data Processing Sharing Agreement.

---

- b. To follow the requirements to selecting a new tool or third party to work with.

#### 3. How security and privacy are different and relate to each other:

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- a. A security program/team/person is focused on protecting the company and its users and preventing threats from getting in.

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- b. A privacy program/team/person is focused on best handling the information we already have (or collect).

---

- c. Security and privacy work together to keep our users and our business safe, preventing unwanted surprises and mitigating risk.

#### 4. When I collect personal data from customers, I need to:

---

- b. Contact our Data Protection Officer.

## Task 4

### Gift and Anti-bribery policy quiz

# Gift or bribe?

A bribe is a financial reward for an action that is illegal, unethical or improper in any way. Bribery includes offering, promising, giving, accepting or seeking a bribe.

Pick which of the following gifts is:

- a. Acceptable
- b. Requires approval of a manager
- c. Unacceptable

---

**i** Roll over the boxes to see the correct answer, or if you're reading a printed version, go to [page 47](#) for the answer.

---

## Task 5

Social Media and Public  
Speaking guidelines quiz

# Think before you post.

Four of the reasons for posting something online  
comply with our policy – and four don't. Sift  
through and find the four good reasons...

---

**i** Roll over the boxes to see the correct  
answer, or if you're reading a printed  
version, go to [page 47](#) for the answer.

---

**1.**  
It's the sort of thing I'd post on my  
personal social media.

**3.**  
It's about a topic or an area of WeTransfer  
policy I know something about.

**4.**  
That troll or critic was annoying.  
I'll show them.

**7.**  
Including my personal email will make  
it easier for me to respond.

# That's a wrap. So, what now?

## **This Code of Conduct is just a guide.**

Just words and images. Promises and good intentions. What really counts is what you do now. Whether you work for us, supply us, partner with us or just use our services, we need you to put this stuff into practice.

Could you do that for us?

Great. Knew we could count on you.

And, of course, you can be sure we'll be doing our bit. You can hold us to account using what's written here in this Code.

### **New joiners**

Welcome. You'll be trained in this Code of Conduct and the policies. Joining us means you're signing up to work by this Code. So please make sure you take a good look.

In the US, you actually have to physically sign this [Code of Conduct Handbook](#).

### **Our people**

Every year you'll get Code of Conduct training. So will the leadership. So will the board. Like we said at the start, we're all in this together. Let's do it!

**Oh yes,  
some  
legalese...**

**It wouldn't be a serious policy document without some serious disclaimers.** So here goes (don't read the next bit before lunch):

This Code of Conduct is our attempt to keep you informed of the terms and conditions of your employment, including WeTransfer policies and procedures. This document is not a contract. The company reserves the right to revise, add, or delete from this Code of Conduct as we determine to be in our best interest, except the policy concerning at-will employment. When changes are made to the policies and guidelines contained herein, we will endeavor to communicate them in a timely fashion, typically in a written supplement to the Code of Conduct or in a posting on company bulletin boards.

**Any questions?**

Get in touch with HR.

**Task 2: Oops! I've lost my laptop.**

**Answer:** c

**Here's why:** Your laptop, phone and other devices will almost certainly hold sensitive data. You need to report the loss to IT Services so the device can be blocked. IT Services, or our Head of Security, will then report the loss to our Data Protection Officer and decide if this is a data breach. If it is, as a responsible company, we have reporting obligations.

---

**Task 2: I think I got hacked!**

**Answer:** b

**Here's why:** It's a good idea to do everything else listed above too. But we can only figure out if something's up if we know to look, and we might not always be looking in the right place at the right time if we aren't told as soon as possible. The more information we have, the more we can do.

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**Task 2: My team wants to buy a new tool.**

**Answer:** c

**Here's why:** Please inform IT Services. There may already be tooling in place that matches your/your team's requirements. Also, there are requirements to selecting a new tool or third party to work with. See "To buy or not to buy" decision tree on page 37.

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**Task 2: Which of these three things will make my data more secure?**

**Answer:** all of them – a, b and c!

**Here's why:** Data protection is all our responsibility. You need to be thorough and follow all these steps.

---

**Task 3: Spot the odd one out.**

**Answer:** 1) c 2) c 3) d 4) a

---

**Task 4: Gift or bribe?**

**Answer:** 1) a 2) c 3) b 4) b 5) b 6) c 7) b 8) c

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**Task 5: Think before you post.**

**Answer:** 2, 5, 6, 8

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**WeTransfer**