

**JET  
BRAINS**



# **Compliance Program Highlights**



2023

# Introduction



This summary is provided to our business partners with the aim of supporting them in know-your-customer, onboarding, and due diligence related procedures. We hope that this set of information allows them to understand the pillars of our internal compliance framework and satisfy their internal and regulatory requirements.



## Compliance with Laws

JetBrains is committed to complying with all applicable laws and regulations, and conducting business in a fair and proper way.

## Code of Conduct

JetBrains does not comply with third parties' Codes as a matter of internal policy (as we work under different commercial circumstances, and we believe that any Code of Conduct is unique to each company). However, we are willing to comply with the spirit and general principles of third-party Codes that are established on the same foundations as our [Code of Conduct](#).

## Whistleblowing Channel

JetBrains has implemented internal whistleblowing channels and a process to satisfy applicable legal requirements. We have a strict non-retaliation policy against everyone who reports a matter in a good faith, and we do not prevent anyone from reporting their concerns to an appropriate authority.

## Sanctions and Export Control Laws

JetBrains respects and complies with applicable export, import, and sanctions control laws, including, but not limited to, those of the European Union and the United States.

Our internal controls and procedures include, among others: product classification review, a sanctions/export control screening process, a suspicious account, activity, and transaction identification and review procedure, regular internal audits, monitoring of sensitive transactions, and compliance awareness of sanctions and export control related areas.



## Anti-Bribery and Corruption Laws

Corruption is illegal and unethical. It depletes both public and private resources and allows bad actors to enrich themselves at the expense of those who spend their time, creativity, and money developing competitive products and services. It is contrary to what we do at JetBrains.

JetBrains strictly rejects any and all bribery and does not participate in corrupt or shady activities. We require our authorized business partners to do the same.

Our internal controls and procedures include, among others: anti-bribery policies and rules, third party risk assessments, adverse media checks, gifts and hospitality rules, monitoring of abnormal activities, review of sponsorships and marketing events, and awareness of anti-bribery and corruption areas.

## Conflicts of Interest

JetBrains rejects any and all conflicts of interest in its activities. We have a set of procedures to identify and mitigate any situation that is illegal or may appear improper. We also guide our employees and managers on conflict of interest situations and sensitive transactions.

Our internal controls and procedures include, among others: a conflict of interest check in our hiring procedure, internal guidance on conflict of interest situations, and compliance awareness of sensitive activities.

## Anti-Competition Laws

JetBrains supports both fair and free domestic and international trade and does not participate in activities that restrict or distort free competition.

Our internal controls and procedures include, among others: a regular risk assessment of competition law related risks, legal checks on activities with potential competitors, and compliance awareness of antitrust and anti-competition law areas.



## Anti-Money Laundering

JetBrains does not meet the definition of an “obliged” entity, as defined by AML laws. However, we continuously monitor relevant legal regulations as well as our commerce activities in order to meet all regulatory requirements as they emerge. We reject all fraudulent activities and do not participate in any shady or questionable financial or commercial activities.

## Anti-Slavery and Labour Laws

JetBrains does not have a specific modern slavery statement or policy, but we comply with the applicable labour laws including those that prohibit child labour, slavery, and violations of human rights.

## Compliance with Insider Trading Laws

JetBrains is not a publicly traded company and does not have its own internal policy governing the trading of publicly traded securities. However, we comply with all applicable laws and good business practices and have checks in place related to conflicts of interest.

## Health and Safety

JetBrains complies with all applicable health and safety laws. We have, among other policies and procedures, internal guidelines and training for new hires.

## Diversity and Inclusion

We respect all applicable laws and do not discriminate against anyone based on their ethnicity, race, gender, sexual orientation, religion, age, pregnancy, or other legally protected characteristics. We realize that technology has an impact on the lives of many different people. We embrace diversity and understand its importance. Working with people of various backgrounds and cultures is better for all of us.



## Compliance Contact

In case more information is needed, please contact our compliance department at [compliance@jetbrains.com](mailto:compliance@jetbrains.com).

