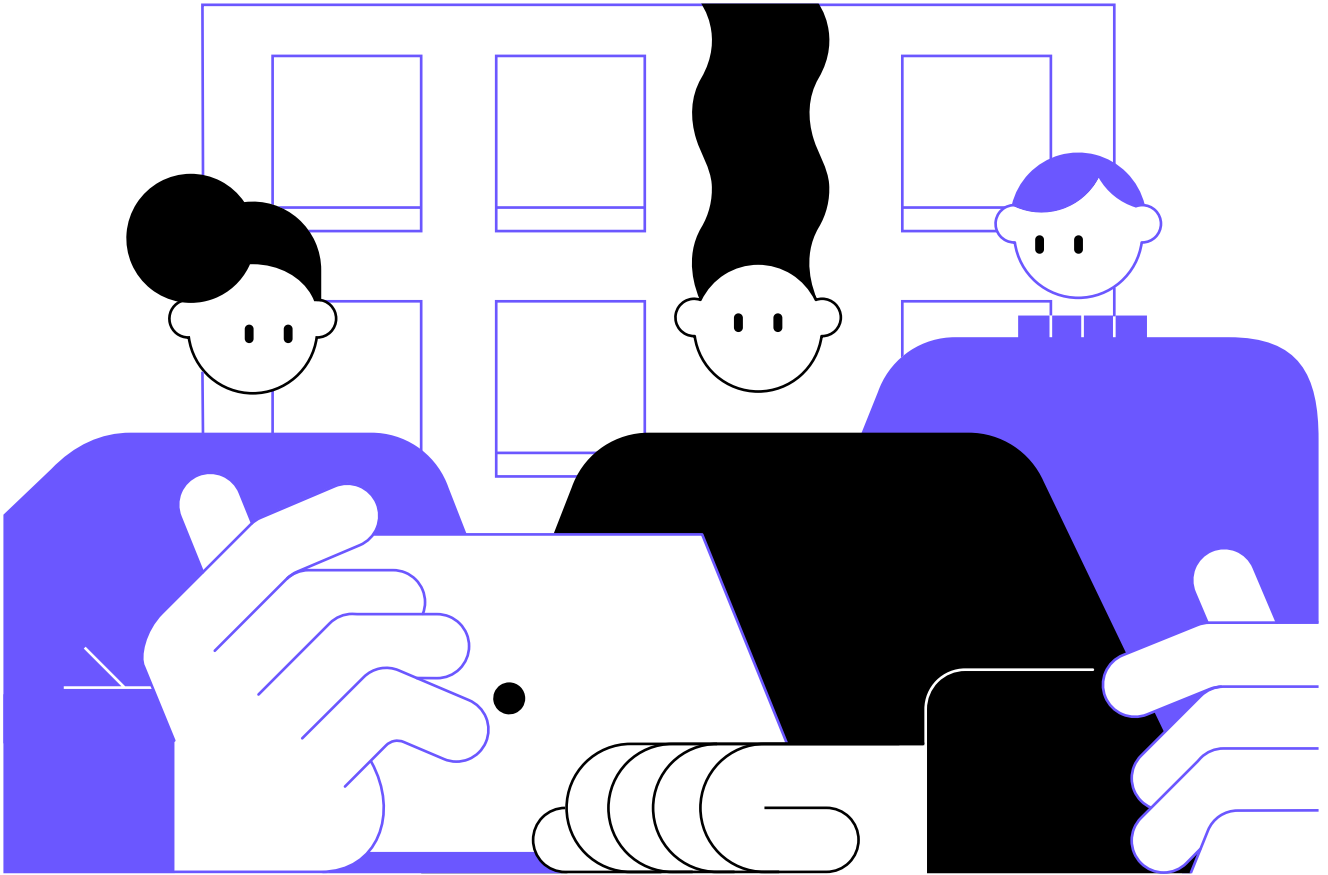




Code of Conduct



2022



Introduction

This Code of Conduct sets out JetBrains' standards of compliance in accordance with applicable laws and regulations while emphasizing many of our core values: the JetBrains family, the community, innovative products, and integrity are what matter most to us.



Questions or concerns about violations?

If you have any questions, would like to raise an ethical concern, report a potential violation, or just provide your feedback, please talk to your manager and/or Human Resources. They will know how to proceed or they will redirect you if necessary.

JetBrains has a non-retaliation policy, and you are encouraged to report any misconduct as soon as possible. While open conversation is encouraged and preferable, it is also understood that some people may feel more comfortable reporting issues anonymously. A [form](#) is available for such reports.





Who must follow the Code of Conduct?

Employees, contractors, consultants, and other business partners acting on behalf of JetBrains should be familiar with and follow this Code of Conduct while conducting work for JetBrains. JetBrains' suppliers are also expected to familiarize themselves with the Code of Conduct.



Integrity

The trust of our colleagues, customers, users, and sales and business partners is one of our most valuable assets. Our business practices and company culture should reflect the need to continually earn and maintain that trust.



Freedom of association & expression

JetBrains supports a culture that fosters freedom of association and expression, as long as these forms of expression and association are not illegal and do not cause unjust harm in any way.



Equal opportunity employment and non-discrimination

JetBrains does not tolerate discrimination or harassment based on race, color, religion, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. Employees are treated solely on the basis of their aptitude, individual merit, experience, and qualifications.



Safe workplace

JetBrains provides a clean, safe, and healthy work environment as required by applicable laws. Everyone is responsible for maintaining a safe and healthy workplace by following office-specific health and safety rules and practices. This applies to both physical and psychological well-being. Any form of harassment and intimidation is strictly prohibited.



Working hours, salary, and benefits

JetBrains complies with applicable laws and regulations related to working hours, breaks, and compensation, including those related to minimum wages, overtime hours, and legally mandated benefits. In addition to supporting flexible working arrangements, JetBrains respects standard business hours and provides fair compensation in full and on time. JetBrains does not engage in or support forced labor or child labor.





Conflicts of interest

JetBrains condemns improper conflicts of interest: situations when the personal interests of an employee interfere or may appear to interfere with their job.

Even though many potential conflicts of interests may be easily clarified and resolved, a serious conflict of interests may lead to legal issues for JetBrains and could undermine the trust of our partners and customers. Therefore, it is important to avoid any improper conflict of interest and it is necessary to:

- remain mindful of standard business practices when acting on behalf of JetBrains where you, a member of your family, or a close associate may benefit from your decision;
- follow the locally applicable JetBrains Rules of Ethics;
- comply with applicable laws.

Guidance concerning these matters should be sought from your manager, Compliance Officer, or Human Resources.



Privacy

JetBrains has thorough policies and procedures in place to ensure the privacy of its employees and customers. It is the responsibility of everyone in JetBrains to know these policies and to be aware of the practices that they should follow.

Our [Privacy Policy](#), [its guidelines](#), and applicable data protection laws are therefore imperative. You can always clarify how we protect privacy by contacting us at privacy@jetbrains.com



Communications & public events

JetBrains encourages freedom of expression, and this includes, but is not limited to, expressing yourself in public forums. However, it is important to understand that your opinion does not constitute that of the company.

When taking part in a public event on behalf of JetBrains, it is expected that you will act in compliance not only with this Code of Conduct but also with that of the event itself.

When participating in online discussions representing JetBrains (email, Slack, social media, blog posts, etc.) it is once again expected that, as a JetBrains representative, you will act in compliance with the corresponding code of conduct of the said medium.



Confidentiality

In many instances, JetBrains has direct contractual confidentiality obligations to protect the information that our customers and sales or business partners entrust us with. Such information must be treated as confidential. In cases where disclosing confidential information to an outside party is required, the disclosure should be on a “need-to-know” basis and only under a non-disclosure agreement approved by the Legal department.





Intellectual property

JetBrains respects the work and intellectual property of others. This means making sure that the required licenses (OSS and commercial), consents, and credits are appropriately handled. Inappropriate use of others' intellectual property may expose JetBrains, as well as the initiator of such actions, to criminal or civil enforcement consequences, and we strive to prevent any such situation from arising.

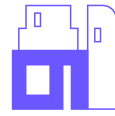


Gifts, entertainment, and other business courtesies

Accepting or providing gifts, entertainment and other business courtesies from or to JetBrains' competitors or business partners can easily create the appearance of an improper conflict of interests or even a violation of local anti-bribery laws.

If possible, obtain your manager's consent before accepting any such offers. Notify your manager or HR about any business courtesies that you have accepted and are concerned about.

The use of JetBrains' approved promotional or branded merchandise when promoting the JetBrains brand is not a cause for concern in this respect. If you aim to provide other business courtesies, follow the rules defined in internal guidelines while taking into consideration local customs but never offer, promise or authorize anything, regardless of its value, with the intention to influence anyone's decisions.



Financial integrity & JetBrains' property

It is important that everyone plays a role in ensuring JetBrains' financial integrity and fiscal stability. This means respecting payment approval processes, using company funds reasonably, and ensuring that financial records are kept accurately.

JetBrains strives to equip its employees with state-of-the-art equipment and ample benefits, and expects that JetBrains' property and the resources provided for the enjoyment of all JetBrains staff will be treated with respect.



Anti-bribery, anti-corruption, and governmental officials

Bribery and corruption are prohibited by applicable law and are inconsistent with JetBrains' values.

A seemingly innocent or well-meaning gift, entertainment invitation, or business courtesy can be interpreted as bribery. Laws relating to government officials are often stricter than those relating to business partners or competitors.

JetBrains does not tolerate any behavior that breaches international money laundering, finance of terrorism, or crime prevention laws and regulations.





Legal and contractual risks

JetBrains does not expect its employees, contractors, or partners to sign contracts on behalf of the company. It is solely the responsibility of the Legal department to review, and of authorized signatories to conclude, contracts on behalf of the company.

However, JetBrains does rely on its employees, contractors, and partners to be alert to legal risks when agreeing with third parties via license agreements, terms of service, and verbal or written agreements. In the event of any uncertainty, you should consult the Legal department prior to taking any action.



International trade controls

U.S., EU, national, and international trade laws might determine to whom JetBrains can and cannot offer its products and services. Compliance with all international trade control laws and regulations is imperative. In the event of any doubt as to whether a product or service can be supplied to a specific country/entity/person, the matter should be raised with the Legal and Compliance departments.



Environment

JetBrains respects society and the environment. JetBrains continuously takes steps to reduce the environmental impact of its day-to-day operations.



Contacts

In the event that you are unsure about any of the requirements defined by our Code of Conduct or want to discuss something in particular, please contact us at ethics@jetbrains.com or reach out to HR.

