

Klaviyo
Business Partner
Code of Conduct



Our Expectation

At Klaviyo, we are committed to conducting business ethically and with integrity, and we expect our business partners to share in this commitment.

This Klaviyo Business Partner Code of Conduct ("Code") articulates our own commitment and outlines the standards and practices that Klaviyo expects our business partners to follow while conducting business with or on behalf of Klaviyo. This Code applies to all of our business partners, including agency partners, technology partners, service provider partners, and any vendors, service providers, suppliers or other parties providing goods or services to or on behalf of Klaviyo. All Klaviyo business partners are required to read and comply with these standards and to ensure that the requirements are communicated, understood, and followed by their employees, agents, contractors and consultants.

Applicability

This Code defines the minimum standards of business conduct and acceptable business practices we expect of all of our business partners.

All business partners are required to have effective policies, documentation and controls that, at a minimum, incorporate the requirements contained in this Code and the laws and regulations applicable to your business.

If local laws and regulations are more permissive than this Code, you are expected to comply with the Code. If local laws and regulations are more restrictive, you must always comply with those legal requirements.



Business Partner Code of Conduct

These terms are in addition to the terms of your Agreement with Klaviyo and may be changed by Klaviyo at any time.

Financial Integrity and Accurate Record Keeping

The accuracy of books and records is essential to Klaviyo to meet legal and regulatory obligations. Business partners must maintain accurate and complete books and records related to their agreements with Klaviyo and all transactions with respect to any Klaviyo-related business. Any documentation, information and submissions that business partners provide to Klaviyo and/or our joint customers must be complete, accurate and not misleading in any way. Business partners must not facilitate the creation or preparation of any false, misleading, or inaccurate records or documents. Business records must be maintained in accordance with all applicable laws and regulations.

Honest and Accurate Dealings

Klaviyo business partners must not make any false or inaccurate representations in connection with any Klaviyo transactions, including, but not limited to, oral misrepresentations of fact, the promotion or utilization of false documentation such as fraudulent or forged contracts, or other false or inaccurate records.

Anti-Bribery Compliance

Business partners must comply with all applicable anti-corruption and anti-bribery laws and regulations, including but not limited to the United States [Foreign Corrupt Practices Act](#) ("FCPA"), the U.S. Federal Procurement Integrity Act and the [U.K. Bribery Act](#). Business partners must not, directly or indirectly (through a third party), make, offer or authorize the payment of any money, gift, bribes, kickbacks or anything of value (including gifts, travel, meals and entertainment), to anyone, including foreign or government officials, employees, or representatives of any government, company, or public or international organization, or to any other party, if such payment is intended, or could be perceived as intended, directly or indirectly, to improperly influence or obtain any unfair competitive advantage. Business partners must fully comply with any rules regarding tender and bid processes.



These terms are in addition to the terms of your Agreement with Klaviyo and may be changed by Klaviyo at any time.

Antitrust and Competition Laws

Business partners must comply with all applicable antitrust and competition laws and regulations. These laws are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. For example, it is not permissible to do or attempt to do any of the following:

- 1) agree with other partners or companies to fix or control prices for offerings
- 2) agree with other companies to boycott suppliers or customers
- 3) agree with other companies to divide or allocate markets or customers
- 4) coordinate bids with other companies.

Trade Compliance

U.S. and international trade laws control where Klaviyo may send or allow access to its products, services and information and to whom Klaviyo may send or allow access to its products, services and information. Business partners must strictly comply with all applicable trade compliance laws, including laws that control the import, export and re-export of Klaviyo products, services and information and laws that restrict dealings with sanctioned entities or individuals or in countries subject to trade embargoes or economic sanctions.

Conflicts of Interest

Business partners will not engage in any activity that could interfere with its contractual responsibilities to Klaviyo or that may be perceived as a conflict of interest that could reasonably be likely to interfere with such responsibilities. Conflicts of interest may include, but not be limited to, Klaviyo personnel being an officer, director or shareholder of business partner, payment of incentives to Klaviyo personnel, or any economic or family relationship with Klaviyo personnel. In the event you become aware of a conflict of interest or potential conflict of interest, you must promptly notify Klaviyo at integrity@klaviyo.com.



Business Partner Code of Conduct

These terms are in addition to the terms of your Agreement with Klaviyo and may be changed by Klaviyo at any time.

Communications Regarding Klaviyo

All statements, communications, and representations to Klaviyo customers must be accurate, complete, and not misleading in any way. Similarly, business partners must not make or attempt to make any written or oral agreements or commitments on behalf of Klaviyo, including product feature commitments, without written authorization from Klaviyo.

Insider Trading Laws

Business partners must comply fully with applicable insider trading and securities laws governing transactions in Klaviyo securities. Business partners that possess or have access to material, non-public information about Klaviyo or other companies including other Klaviyo partners or Klaviyo customers as a result of their relationship with Klaviyo are prohibited by law and Klaviyo policy from trading securities based on that information. Business partners are also prohibited from communicating such information to others who might trade on the basis of that information.

Government Customers

Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with government entities as well as businesses that are government-owned, government-controlled or subject to government procurement rules ("Government Customers"). Business partners that sell to Government Customers must observe all laws, rules, procurement regulations and contract clauses that relate to the acquisition of goods and services by such Government Customers, whether such sale is direct or indirect and including marketing or recommendation of Klaviyo products and/or services.



These terms are in addition to the terms of your Agreement with Klaviyo and may be changed by Klaviyo at any time.

Intellectual Property and Protection of Information

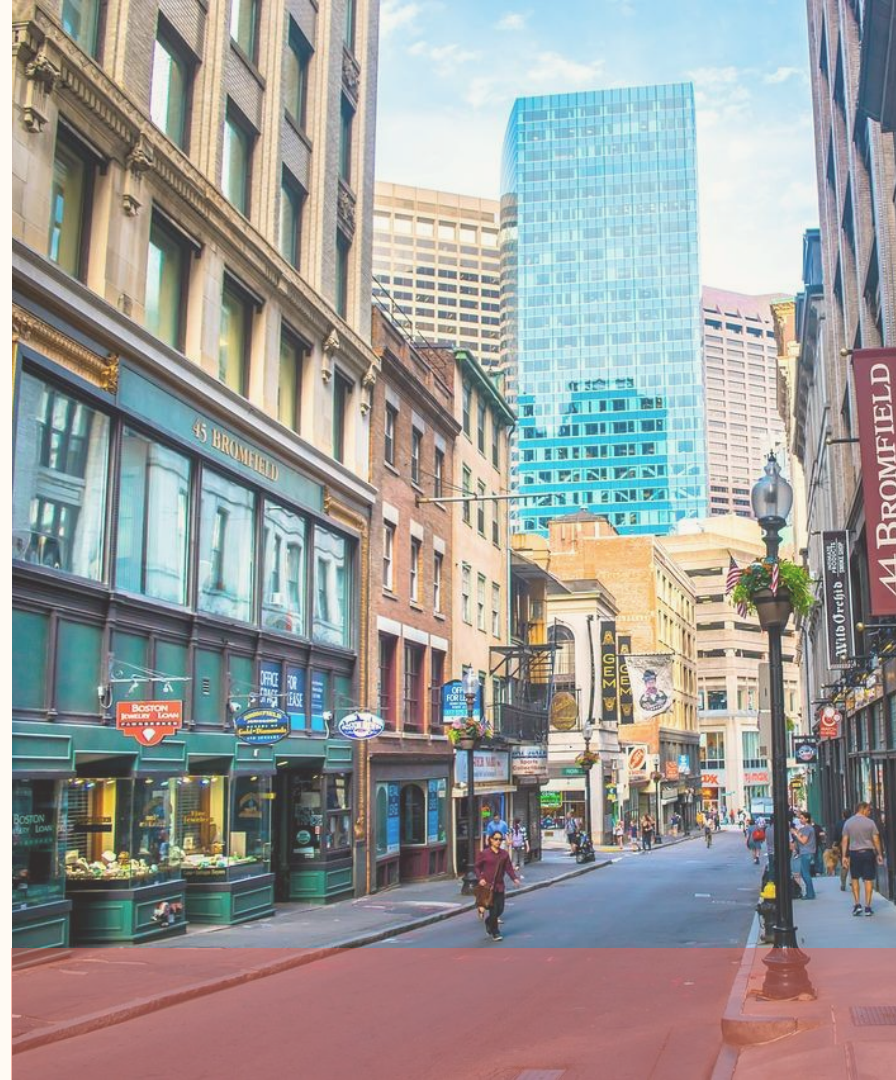
Business partners must respect intellectual property rights, protect confidential information and comply with all applicable laws and regulations related to privacy and data protection. Business partners must protect all confidential information and personal data they acquire or have access to by virtue of their business partner relationship with Klaviyo. This includes personal data about or provided by Klaviyo employees, customers, partners, and other third parties with whom Klaviyo does business.

Additionally, business partners must meet the requirements in its business partner agreement with Klaviyo with respect to any intellectual property, confidential information and personal data.

Human Rights of Workers; Health and Safety

Business partners must be committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community. Business partners will comply with all applicable anti-human trafficking, forced labor, and modern slavery laws and rules including the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act 2010 and Australia's Modern Slavery Act 2018. In short, business partners must engage in fair labor standards that permit freely chosen employment, prohibit child labor and human trafficking, and allow for reasonable working hours and payment of fair wages and benefits, and comply with all applicable employment, health and safety laws.

Business partners must avoid inhumane treatment of workers. Business partners must be committed to a workforce that is free of harassment and unlawful discrimination and which allows for freedom of association of personnel. In addition, business partners must maintain a safe and healthy work environment.



Business Partner Code of Conduct

These terms are in addition to the terms of your Agreement with Klaviyo and may be changed by Klaviyo at any time.

Responsible Business Partner Conduct

Business partners and their representatives must conduct themselves in a professional manner while representing Klaviyo products and services in the marketplace. This means treating all persons with dignity and respect in a businesslike manner while marketing, selling or supporting Klaviyo products and services.

Cooperation

Business partners will cooperate with (a) Klaviyo's periodic requests for documents and/or information made in connection with Klaviyo's business partner onboarding and/or review processes and (b) any investigation or audit by Klaviyo relating to any suspected or alleged violation of this Code or applicable law. Business partners will provide truthful and accurate responses to all requests for information and respond within a reasonable amount of time.

Improper Conduct Reporting

You will immediately report events of questionable, fraudulent or illegal nature that are, or may be, in violation of this Code, or other applicable laws or regulations, to Klaviyo in one of the following methods: (1) email integrity@klaviyo.com or (2) use the Klaviyo Ethics Helpline at klaviyo.ethicspoint.com or (3) contact Klaviyo's General Counsel. Calls to the Ethics Helpline are received by an independent third-party service specifically retained by Klaviyo to handle such reports. In countries where applicable, reports can be made anonymously, and will be kept confidential to the fullest extent practicable and allowed by law.

Violations

Any violations will be reported to the business partner's management for their attention, and if appropriate, corrective action. Klaviyo may also enforce violations of this Code by taking other action(s) as it deems appropriate, including suspension or termination of the business partner's relationship with Klaviyo.



klaviyo

Corporate Headquarters:

Klaviyo Inc.
125 Summer St, Floor 6
Boston, MA 02111

International Headquarters
49 Southwark Bridge Rd
London SE1 9HH, UK

Klaviyo Legal Contact Information:

Legal@klaviyo.com

Klaviyo Compliance Contact Information:

integrity@klaviyo.com

Report a concern:

[Klaviyo.ethicspoint.com](https://klaviyo.ethicspoint.com) or call
United States 1-(833) 626-1515

