

# dbt Labs Code of Conduct

## Introduction

This Code of Conduct (“Code”) is to act as a guide for behavior to assist us all in making good (and legal) decisions, however, it is not meant to be a legal contract. Employees are expected to read and comply with the requirements stated in this Code, as well as all applicable laws and regulations.

This Code is subject to change at any time at dbt Labs’s sole discretion. This Code supersedes all preexisting policies of dbt Labs to the extent that they conflict with this Code. Only dbt Labs may modify this Code. This Code is meant to work in conjunction with the employee handbook, and if there is any perceived conflict between the two, please address concerns to the Head of People, Meghan Colón (or for non-employees to [legal@dbtlabs.com](mailto:legal@dbtlabs.com)).

## Open Door / Speak Up Policy

If you have any questions concerning this Code, or are unsure about appropriate conduct in a situation, we encourage employees to consult their immediate supervisor, talk to one of the members of the leadership team, the Head of People, Meghan Colón (Email: [meg@dbtlabs.com](mailto:meg@dbtlabs.com) or Slack: @meg) for clarification, or, for non-employees, [legal@dbtlabs.com](mailto:legal@dbtlabs.com). **If you suspect that a crime or a violation of the Code has been committed by dbt Labs, another employee or even a visitor or client, please immediately report your concerns to the company.** To do so, contact Meghan Colón directly, or you may also report your concerns utilizing our anonymous reporting hotline, EthicsPoint or by sending your concerns to the PeopleOps team as described in [this](#) page, or for non-employees contact [legal@dbtlabs.com](mailto:legal@dbtlabs.com).

We are committed to preventing any occurrences of unethical or unlawful behavior, and to halting any unethical or unlawful behavior that may occur as soon as reasonably possible after discovery. We are also committed to promptly investigating reported concerns in a prompt manner and taking appropriate remedial action. Investigations and reports will be treated as confidential to the extent feasible and permitted by law. Violation of this Code or applicable laws or regulations may result in disciplinary action up to and including immediate termination of employment.

Furthermore, dbt Labs is committed to protecting the rights of those individuals who report concerns to us. No individual will be retaliated against for making a complaint in good faith regarding a violation of these policies, or for participating in good faith in an investigation pursuant to these policies. If an individual feels they have been retaliated against, the individual should file a complaint using the procedures set forth above. This protection applies to all employees, agents and customers of dbt Labs. Lastly, nothing in this Code prevents, restricts or

prohibits employees from reporting to an appropriate governmental agency, regulatory authority or other entity, conduct that the employee believes to be violation of law.

## **Equal Employment Opportunity**

dbt Labs is an Equal Opportunity Employer that does not discriminate on the basis of race, color, national origin, ancestry, sex, pregnancy (which includes childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), gender identity, gender expression, religion, disability, genetic information, age, marital status, sexual orientation, military and veteran status, family and medical leave, or any other characteristic protected by federal, state or local law. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment.

dbt Labs will endeavor to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on dbt Labs's operations, and make reasonable accommodations for qualified individuals with disabilities to, at least, the extent required by law. If you wish to request such an accommodation, please speak to the Head of People, Meghan Colón (Email: [meg@dbtlabs.com](mailto:meg@dbtlabs.com) or Slack: @meg).

## **Anti-harassment and Discrimination Policy**

It is the policy of dbt Labs to provide a work environment free from all forms of discrimination, including sexual harassment and harassment based on any protected status. dbt Labs is committed to the elimination of all harassment and discrimination in the workplace and will not tolerate the harassment of our employees, whether by an employee, customer, vendor, business partner or guest.

Discrimination includes, but is not limited to: making any employment decision or employment-related action on the basis of any of the protected classes listed above. Harassment is generally defined as unwelcome verbal or nonverbal conduct, based upon a person's protected characteristic, that denigrates or shows hostility or aversion toward the person because of the characteristic, and which affects the person's employment opportunities or benefits, has the purpose or effect of unreasonably interfering with the person's work performance, or has the purpose or effect of creating an intimidating, hostile or offensive working environment.

Harassing conduct includes, but is not limited to: epithets; slurs or negative stereotyping; threatening, intimidating or hostile acts; or denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group based on their protected characteristic.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal, visual or physical conduct of a sexual nature, when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of sexual harassment include, but are not limited to: unwelcome or unsolicited sexual advances; displaying sexually suggestive material; unwelcome sexual flirtations, advances or propositions; suggestive comments; verbal abuse of a sexual nature; sexually-oriented jokes; crude or vulgar language or gestures; graphic or verbal commentaries about an individual's body; display or distribution of obscene materials; physical contact such as patting, pinching or brushing against someone's body; or physical assault of a sexual nature.

## **Human Rights**

dbt Labs is committed to protecting basic human rights for all individuals as outlined in the United Nations' Guiding Principles on Business and Human Rights. In compliance with these principles, dbt Labs is guided by the "protect, respect, and remedy" framework. Our commitment to these principles means:

- We will not engage child labor, nor buy from or support companies who are known to exploit child labor.
- We oppose forced or compulsory labor and human trafficking.
- We ensure fair treatment and work conditions for all employees, including the right to freedom of association and collective bargaining.

A copy of the UN principles can be found here:

[https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

## **Professional Conduct Policy**

dbt Labs expects its employees to adhere to a standard of professional conduct and integrity. This ensures that the work environment is safe, comfortable and productive. Employees should be respectful, courteous, and mindful of others' feelings and needs. General cooperation between coworkers and supervisors is expected. Individuals who act in an unprofessional manner may be subject to disciplinary action up to and including immediate termination of employment.

## **Drug and Alcohol-Free Workplace Policy**

dbt Labs is committed to providing a safe work environment and to fostering the well-being and health of its employees. This policy applies to all employees and other individuals who perform work for dbt Labs.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances (including medical marijuana), drug paraphernalia or alcohol by an individual anywhere on dbt Labs premises, while on dbt Labs business or while representing dbt Labs, is strictly prohibited. Employees and other individuals who work for dbt Labs also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled substances, except when the use is pursuant to a valid prescription from a licensed medical practitioner and the licensed medical practitioner authorized the employee or individual to report to work. However, if an employee's authorized use of prescription drugs interferes with the employee's ability to perform their job or otherwise poses safety concerns, in the workplace, the individual may be removed from their position, reassigned to a different position, or discharged if the circumstances warrant. To be clear, employees have no right to report to work under the influence of medical marijuana, except as permitted by and in accordance with applicable law.

This restriction does not apply to responsible drinking of alcohol at business events and related social outings where alcoholic beverages are served, and events for dbt Labs where alcoholic beverages are served. It is the responsibility of every employee to drink responsibly at these events. You should not drink and drive. dbt Labs will reimburse you for the cost of reasonable transportation to get you home from any event you attend as part of your work responsibilities. dbt Labs will not excuse bad behavior due to your failure to drink responsibly and we assume no responsibility to monitor or limit your consumption of alcoholic beverages. The goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive and drug-free environment. Violation of this policy will result in disciplinary action, up to and including discharge.

## **Conflicts of Interest**

### **General**

dbt Labs recognizes the right of employees to engage in activities outside of employment which are of a private nature and unrelated to dbt Labs's business. Please contact your supervisor or the Head of People, Meghan Colón (Email: [meg@dbtlabs.com](mailto:meg@dbtlabs.com) or Slack: @meg), if you have questions regarding a possible conflict of interest or outside activity that might interfere with your job responsibilities with dbt Labs. Also, you may at times be asked to complete a questionnaire dealing with possible conflicts of interest.

Conflicts of interest are common in (but not limited to) the following four situations.

1. When an employee or a member of the employee's family has significant direct or indirect financial interest in, or obligation to an actual or potential competitor, supplier, partner, reseller or customer of dbt Labs, or any entity in which dbt Labs has an interest;
2. When an employee conducts business on behalf of dbt Labs with a supplier, partner, reseller or customer in which the employee's relative is a principal, an officer or a representative;
3. When gifts worth more than US\$200.00 from a current or potential supplier, partner, reseller or customer are accepted by an employee, a member of the employee's family, or any person, charity or other entity designated by the employee;
4. When an employee misappropriates information obtained in the course of his or her employment.

Customers include (i) those who buy our services, and (ii) those who can exercise major influence on our customers.

## **Improper Payments / Anti-bribery**

dbt Labs specifically prohibits offering, giving, soliciting, or receiving any form of bribe or kickback. These are criminal acts and can result in criminal prosecution of both the individual involved and dbt Labs. All gifts to federal, state or municipal employees or other public officials are forbidden.

## **Foreign Corrupt Practices Act**

dbt Labs complies with all laws and regulations concerning bribery to foreign individual and entities (ex. Foreign Corrupt Practices Act in U.S.A.)

Any payment to a foreign official for the purpose of influencing that individual to assist in obtaining or retaining dbt Labs business for any person, including any business organization, or any of our clients is prohibited. dbt Labs strictly prohibits any employee from making any payment on dbt Labs's behalf or on behalf of one of our clients that would violate those laws and regulations. Employees who violate this policy are subject to disciplinary action up to and including immediate termination of employment.

## **Antitrust**

### **General**

It is dbt Labs's policy to uphold and comply with antitrust laws. Strict adherence to these standards will help employees and dbt Labs avoid criminal and civil penalties. Such adherence also will ensure that dbt Labs will continue to act as a vigorous but fair competitor within the marketplace.

## Antitrust laws

The Antitrust laws have evolved over a period of many years in response to a need to promote vigorous competition at all levels of commerce.

There are two principal federal antitrust laws that affect your business discussions and dealings:

1. The Sherman Act
2. The Robinson-Patman Act

***The Sherman Act*** The most widely recognized activity that is illegal under the Sherman Act is price fixing, conduct which includes agreements or arrangements to "stabilize" prices with distributors or competitors. Less well known but equally illegal, are arrangements, understandings, discussions or "gentlemen's agreements" with competitors about allocation of production, customers or territories. Discussions or "understandings" with our distributors regarding bidding arrangements, agreements to boycott certain customers or suppliers, also are strictly prohibited as a matter of dbt Labs policy. Regardless of how innocent discussions of these topics may seem, they may be illegal.

The Sherman Act also makes it illegal under some circumstances, to require a customer to buy one product as a condition of purchasing another product. Such arrangements are called "tying" agreements and may be illegal. The Sherman Act further prohibits you, under some circumstances, from insisting that customers deal exclusively with dbt Labs and not purchase services or products from its competitors.

***The Robinson-Patman Act*** The Robinson-Patman Act is concerned with discrimination in the prices charged to various customers. The basic purpose of this Act is to protect small businesses by requiring that price discounts, favorable marketing programs and promotional services be made available to all customers regardless of their size or purchasing power. There are a number of exceptions to the Robinson-Patman Act. For example, volume discounts may justify cost differentials. A lower price may be quoted to a customer if it can be demonstrated that it is necessary to do so in order to meet a similarly quoted price from a competitor.

## Environment

We preserve and protect the environment. Because our fully-distributed workforce does not commute to offices, we reduce our carbon footprint daily. Recycling obsolete equipment is another key initiative we've undertaken. We are committed to finding more ways to utilize sustainable energy, source "green" products, and prioritize reuse and recycle initiatives. We encourage employees to suggest more ways of protecting and preserving the environment.

## Workplace Health and Safety

We are committed to providing a safe and healthy work environment for all employees, whether they are working on-site in a dbt Labs owned or leased property or working remotely from home or in a co-working space. dbt Labs provides an annual stipend for employees, which should be used to purchase items such as ergonomic work equipment, proper lighting, or other equipment or modifications needed to allow our employees to work effectively and safely from their chosen location. Because our workforce is distributed, we must rely upon our employees to ensure that work areas are kept safe and free of hazardous conditions. Before starting work each day, please survey your workspace to ensure it is free from any hazards or health or safety risks.

dbt Labs intends to comply with all health and safety laws applicable to our business. If you become aware of any safety-related concern, hazardous condition, or other workplace injury, accident, or illness, you must immediately report the matter to your supervisor or the Head of People, Meghan Colón (Email: [meg@dbtlabs.com](mailto:meg@dbtlabs.com) or Slack: @meg).