Etsy

CODE OF CONDUCT

Version 5: June 2025

Overview

This Code and our company guiding principles describe the standards of conduct expected of everyone at Etsy and its subsidiaries (collectively, the "Company"). These guiding principles guide daily interactions, empower individuals and teams, scale decision making, promote the highest level of ethical standards, provide a shared language, and unite us in our identity.

This Code applies to everyone working for our Company throughout the world, regardless of position or tenure. We also expect our Company's contractors, consultants, suppliers, and agents to abide by our Code in connection with their work for the Company.

Our Guiding Principles

We commit to our craft. Our work has the power to change lives. That's why we strive to continuously learn and excel at what we do.

We minimize waste. Time, resources, and energy are precious, so we focus only on what will have the greatest impact.

We embrace differences. Diverse teams are stronger, and inclusive cultures are more resilient. When we seek out different perspectives, we make better decisions and build better products.

We dig deeper. The best solutions to meaningful challenges are rarely easy or obvious. We stay curious, balance our intuition with insights, and decide with confidence.

We lead with optimism. We believe in our mission, and we believe in each other. We see the world as it is, set ambitious goals, and inspire one another with generosity of spirit. Together, we reimagine what's possible.

Guiding Principles in Action

The following core foundations support our guiding principles and help make our Company and the world a better place. We strive to ensure that the actions we take are in compliance with the law and our policies, and in keeping with our high ethical standards.

We operate with honesty and integrity. We keep our commitments to each other and to members of our Community—that is, Company employees, sellers, buyers, users, suppliers, neighbors, investors, and other stakeholders. We strive to communicate about the Company in an honest and clear way and avoid making misleading communications or creating false impressions. We may make

mistakes, but we quickly admit and correct them.

We treat others fairly and respectfully. We foster a respectful work environment free from any form of discrimination, harassment, retaliation, and intimidation. We provide equal opportunity in all aspects of employment. We do not tolerate discrimination, harassment, retaliation, violence, or threatening behavior of any kind. We always treat all members of our Community with dignity and respect. We read and follow our Employee Handbook and Policies Against Harassment, Discrimination, and Retaliation.

We are responsible and law abiding. We follow the law. This includes international, national, and local laws, rules, and regulations where we do business. We also report wrongdoing, if we encounter it, and follow the reporting procedures described later in this Code.

Responsibilities to The Company

We avoid conflicts of interest or even the appearance of conflicts of interest. We have a responsibility to make sound business decisions strictly on the basis of the Company's best interests without regard to our personal interests. A conflict of interest occurs when our personal interests, activities, investments, or associations interfere in any way—or even appear to interfere—with the Company's interest.

We disclose to our Legal and Compliance team any relationships, investments, associations, or activities that may create actual, potential, or perceived conflicts of interest, as soon as we become aware of any potential for such conflict, unless such requirement is restricted by applicable law. The Company may also inform you if it believes that you have such a relationship, investment, association, or activity.

We respect corporate opportunities. We are loyal to the Company and owe a duty to advance its legitimate business interests when business opportunities arise. We don't take opportunities for personal gain that are discovered through the use of Company property, information or position, and we will not use Company property, information or position for personal gain, or compete with the Company in any manner.

For example, we don't divert an investment opportunity or possible acquisition for the Company for personal gain. We also don't compete with the Company by consulting for a competitor or starting a competing side business.

We realize that some of the members of our Board are professional investors and may receive various opportunities in the course of their work. We do not expect that such a director would offer an opportunity to our Company unless the matter, transaction, or interest is presented to, or acquired, created or developed

by, or otherwise comes into the possession of that director expressly and solely in that director's capacity as a Company director.

We safeguard confidential information and care deeply about privacy. We are committed to protecting the confidential and proprietary information of the Company, its employees, sellers and buyers, users, and others with whom we do business.

We believe in being clear and upfront about our privacy practices, including how we treat personal information.

We do not disclose confidential information without proper authorization and we will use such information for legitimate business purposes and in accordance with applicable laws and governing contracts.

We do not trade or tip others when we have inside information. We do not buy or sell Company stock when in possession of material non-public information, or pass such information to others, including friends or family. We follow our Company's Insider Trading Policy and ask our Legal team if we have questions.

We maintain accurate and complete business and financial records. We create and maintain financial records in accordance with applicable legal requirements and generally accepted accounting practices. Our SEC reports, disclosures, and other public communications must be full, fair, accurate, timely, and understandable.

We are each responsible for the Company's financial integrity and fiscal responsibility. We acknowledge our responsibility to inform appropriate finance or legal personnel in a timely manner of anything that might have a material impact on our financial statements or disclosures.

We also follow our records retention policies when storing or deleting Company information and business records.

We protect and properly use Company assets. Theft, carelessness, and waste have a direct impact on our profitability. We treat Company equipment and facilities with care. We use Company assets for legitimate business purposes and use good judgment when using Company equipment for reasonable personal use. In addition, we use the Company's information systems in a responsible manner consistent with our Employee Handbook.

We do not speak on behalf of the Company unless we are authorized to do so. Only certain individuals may speak on the Company's behalf. When speaking publicly and using social media, we follow our External Communications Handbook and reach out to the VP, Communications with questions.

Responsibilities to Our Community

We deal fairly. We deal fairly with our Community. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair dealing. We do not misuse our position at the Company to bypass our terms of use or seek special treatment from buyers, sellers, or users on our marketplaces.

We respect the environment. We conduct our business in an environmentally responsible and sustainable manner, and we are committed to proactively countering the planet's ecological crises. We embrace our responsibility to minimize the ecological footprint of our operations and our duty to empower and incentivize those with whom we do business to do the same.

We uphold human rights. We respect human rights, provide fair working conditions, and prohibit the use of any forced, compulsory, or child labor by or for our Company or our sellers. We prohibit discrimination and treat each other with dignity. We recognize, respect, and value each other for our differences.

We do not permit bribery. Our Company's policy against bribery is clear—we never make or accept bribes to advance our business. We do not offer or give anything of value for an improper or corrupt purpose, whether in dealings with a government official or the private sector, and regardless of the norms of local custom. We follow our Anti-Corruption Policy and ask our Legal Department if we have questions.

We comply with antitrust and competition laws around the world. We do not discuss or exchange competitively sensitive information with competitors. We also do not participate in other anti-competitive conduct, such as agreeing with competitors on geographic markets, customers, or pricing. Before interacting with a competitor, we ask our Legal team any questions about whether our actions are proper and in compliance with the law.

We comply with trade regulations. We comply with import and export laws and act in accordance with U.S. economic sanctions and embargoes that prohibit or restrict trade with certain countries or individuals.

Making Ethical Decisions

It is your responsibility to make the right decisions that support the health of our Company and the success of this Code. When you are faced with difficult decisions, please take the time to think and consider the potential consequences of your actions.

We all benefit tremendously when exercising our power to prevent mistakes or wrongdoing by asking the right questions at the right times. Therefore, do not give in to pressure and rush your decisions.

Carefully consider the implications of your actions. Before making a decision, ask:

- Is it honest and fair?
- Is it consistent with the law, employee policies, and this Code?
- Is it consistent with our Guiding Principles in action as well as our responsibilities to our Company and the Community?
- Does it represent information accurately and follow normal procedure?
- Does it make you feel good about yourself and the Company?
- Would you feel comfortable describing your decision at a staff meeting?
- Would it look okay if it made the headlines?
- Is this the right thing to do?

If you hesitate in answering “yes” to any of these questions, then it may be best to get a second opinion. Always ask for help when you need it.

Asking Questions or Reporting Concerns of Illegal or Unethical Behavior

The Company is committed to providing a safe and reliable means for employees and others to report concerns they may have about conduct at work. The guidelines below explain how to raise concerns confidentially and anonymously, if desired, and free of retaliation.

We use our best judgment and ask questions. We use our best judgment in our business dealings and in upholding this Code. If we are unsure whether something violates our Code, an employee policy or the law, we promptly contact our manager or the Chief Legal Officer for answers.

We voice ethical concerns. We believe that empowering ourselves to voice our opinions and concerns will help keep our Company an open and supportive place to work. We understand the importance of speaking up and encourage you to seek guidance when faced with difficult and unique decisions before they become a violation of law, employee policies, or this Code.

We report violations. We promptly report any actual or possible violation of our Code, Company policy, or the law to our manager, the Chief Legal Officer, or via our whistleblower hotline. Failure to report a violation or possible violation may itself be considered a violation of the Code, employee policy, or applicable law.

Reporting options for violations of this Code, or to help evaluate and resolve

ethics and compliance issues include:

- Discussing the situation with your manager; or
- If your manager is involved in the situation or you are uncomfortable speaking with your manager, contacting the Chief Legal Officer; Chief Human Resources Officer; Assistant General Counsel, Employment; or
- If you do not believe your concern is being adequately addressed, or you are not comfortable speaking with one of the contacts above, you may report your concern via Etsy's whistleblower hotline, which allows anonymous reporting 24 hours a day, 7 days a week:
    - Phone:

Region	**Phone Number**
Australia	1-800-950-665
Ireland (Toll Free)	1800 777 793
UK	0808 101 1123
USA and Canada (Toll Free)	+1 (866) 887-9755

    - **Online:** https://etsy.i-sight.com/portal.

You may also make a report regarding accounting, internal financial controls, auditing matters, or other related issues directly to the Audit Committee of the Board by mail at:

Chair, Audit Committee of the Board
c/o Chief Legal Officer
Etsy, Inc.
117 Adams Street
Brooklyn, NY 11201

For reports that are not anonymous, receipt will be acknowledged to the sender within a reasonable period of time.

All reports of a violation or possible violation will be taken seriously and investigated. The specific action taken in any particular case will depend on the nature and gravity of the conduct reported and the results of the investigation. The Company will keep reports confidential to the extent consistent with our

ability to conduct a full and fair investigation and to comply with our legal obligations.

In some locations outside of the United States, anonymous reporting may not be allowed by local law.

We do not retaliate. The Company takes its non-retaliatory culture very seriously and will not allow anyone to take adverse action, threaten, intimidate, or retaliate if one of us reports a violation or suspected violation in good faith, or cooperates in an investigation. The Company considers retaliation itself a violation of this Code and will respond accordingly.

If you believe that you have been subject to retaliation, please report it promptly by one of the methods described above. Reporting retaliation enables our Company to honor our guiding principles and promptly investigate. If a complaint of retaliation is verified, appropriate disciplinary action will be taken, up to and including termination of employment or any other working relationship that the accused may have with the Company.

We understand the consequences of violations. Anyone who violates the law, our Code, or other Company policies or procedures may be disciplined, up to and including termination of employment and/or their business relationship with the Company, in accordance with local legal requirements. Certain violations of this Code may be violations of the law, which may result in civil or criminal penalties, and the Company will cooperate fully with the appropriate authorities in these situations.

We discourage waivers of the Code of Conduct. Waivers of our Code are considered on a case-by-case basis and are discouraged. Waivers for Board members and executive officers require Board approval by a majority of the disinterested directors and waivers involving any other employee or stakeholder require the written approval of our Chief Legal Officer.