



Netflix Supplier Code of Conduct

Netflix is dedicated to entertaining the world. To create best-in-class stories across a wide variety of genres, languages and countries, Netflix utilizes suppliers around the globe.

We have created this Netflix Supplier Code of Conduct (“Code”), which sets forth the standards expected of any supplier of goods and services (“Supplier”) to Netflix, Inc. and its subsidiaries (collectively, “Netflix”).

GENERAL

Suppliers must commit to conducting their business operations in a responsible, safe, honest, and ethical manner.

Suppliers must comply with all applicable laws, rules, regulations, and all obligations in any contract a Supplier may have with Netflix, and conform to this Code. The standards in this Code are supplemental to any standards imposed by contract between Supplier and Netflix. To the extent there is any inconsistency between this Code and any provision of a contract between Supplier and Netflix, the contractual provision will control. Supplier will communicate these expectations to its personnel and subcontractors. Netflix may use a Supplier’s conformance to this Code in making procurement decisions, including terminating our relationship with any Supplier that fails to meet these standards.

INFORMATION DISCLOSURE

Suppliers will cooperate with Netflix’s reasonable requests for information to verify Suppliers’ conformance with this Code. Suppliers will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with and as required by applicable laws. Upon Netflix’s reasonable request, Supplier will provide a copy of such information to Netflix.

ETHICS AND COMPLIANCE

Honest and Ethical Conduct

Suppliers must act and perform their duties ethically and honestly. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct also includes the ethical handling of actual or apparent conflicts of interest.

Suppliers should avoid any situation that may involve an actual, potential or perceived conflict of interest. Suppliers must not use Netflix information for a personal benefit or to promote a competing business or activity. Suppliers should disclose to Netflix any actual, potential, or perceived conflicts of interest relating to the work Supplier does

for Netflix that results from any personal or business relationships with Netflix or our employees, customers, and Suppliers. Any personnel of Supplier may report conflicts of interest through Netflix's confidential reporting hotline at www.netflix.ethicspoint.com.

Anti-Bribery and Anti-Corruption

Bribes and kickbacks are anything of value given for an improper purpose or to improperly influence the performance of a specific activity. Suppliers will not offer, promise or accept any form of bribes or kickbacks, and must not participate in or facilitate corrupt activities of any kind, including extortion or embezzlement. Suppliers will not make illegal payments directly or indirectly. Suppliers will comply with applicable anti-bribery and anti-corruption laws and regulations.

Trade Compliance

Suppliers will comply with all applicable trade laws and regulations. Suppliers must comply with the economic and trade sanctions administered by the [US Office of Foreign Assets Control \(OFAC\)](#), the [US Department of Commerce](#) and the [US Department of State](#). Other sanctions, such as those administered by the [UN Security Council](#), the [European Union](#) or other local sanctions programs may also apply. Suppliers must also comply with all export and import regulations for goods and services, including proper payment of duties and taxes, forced labor laws and any and all certification and license requirements.

Netflix expects its Suppliers to work with Netflix to promptly address any trade compliance issues that may arise.

SOCIAL RESPONSIBILITY

Labor and Human Rights; Modern Slavery

Suppliers will comply with all applicable employment and labor laws. Netflix will not tolerate or condone the use of forced, indentured or compulsory labor, or deprivation of liberty, including any form of human trafficking or other forms of physical, mental or economic exploitation of individuals by our Suppliers.

No Child Labor

Suppliers will not use or support any child labor. Netflix considers child labor to be anyone under 15 years of age, unless local law sets a higher threshold. Exceptions for Suppliers utilizing child performers must meet all relevant legal requirements. Suppliers are expected to utilize appropriate processes to verify the age of workers.

Wages

Suppliers will comply with all applicable laws and regulations concerning wages and benefits.

Working Hours and Overtime

Suppliers will comply with all applicable laws and regulations related to working hours and overtime, including applicable work-hour-related premiums and allowances, maximum hours of work, and minimum rest periods. Netflix expects our Suppliers to

maintain accurate records of working hours when legally required, and to promptly address any concerns or complaints related to working hours that may arise.

Non-Discrimination and Anti-Harassment

Netflix expects Suppliers to maintain a workplace that is free from discrimination and harassment. Suppliers must have policies and procedures in place to prevent and address discrimination and harassment, and must take swift action to investigate and resolve any allegations of discrimination, harassment, or other misconduct.

Freedom of Association and Collective Bargaining.

Suppliers should respect the rights to freedom of association, collective bargaining and representation in accordance with local laws. Suppliers must permit their personnel to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment consistent with local laws.

Health, Safety and Environment

Suppliers must comply with all applicable health, safety and environmental laws, legislation and regulations. As required by local law, Suppliers must identify, evaluate, and minimize worker exposure to health and safety hazards and protect their personnel by providing them with information about risks, as well as appropriate personal protective equipment.

Netflix encourages its Suppliers to identify the environmental impacts of their operations and minimize their adverse effects on the community, environment, and natural resources.

Sustainability

Netflix encourages its Suppliers to measure and publicly disclose their carbon footprints, to set targets, and to implement action plans for reducing environmental impacts, particularly for fuel/energy usage reduction and renewable energy implementation. Suppliers will make good faith efforts to decarbonize their operations and responsibly source materials for products they provide to Netflix. At a minimum, Suppliers must follow all applicable climate-related laws and regulations, and make reasonable efforts to meet industry standards to minimize the impact on the environment and exercise proper due diligence in their own supply chain.

INFORMATION PROTECTION

Confidential information

Suppliers must protect Netflix information that is not publicly known and keep confidential information safe from loss, theft, or unauthorized access or disclosure. As part of that obligation, Suppliers are strictly prohibited from making audio visual recordings of any kind while on site at Netflix or its associated facilities, properties or locations, unless expressly authorized or requested by Netflix as part of Supplier's services.

Intellectual Property

Except as expressly authorized in writing by Netflix, Suppliers must not use Netflix's intellectual property, including trademarks, copyrights, patents, trade secrets, and other intellectual property.

Privacy and Information Security

Suppliers must comply with all applicable data protection laws and regulations regarding data handling, including any obligation to protect the privacy and security of all personal information obtained or processed on behalf of Netflix. Supplier personnel that are provided access to Netflix's computer or communications systems, networks, systems, applications, storage, services, or other IT infrastructure, or who process personal information on Netflix's behalf, must only use those assets and information as permitted by Netflix.

REPORTING SUSPICIOUS CONDUCT

Confidential Reporting

Suppliers and their personnel should report possible violations of this Code occurring during a Netflix engagement through their internal management chain or, where appropriate, to their primary Netflix contact. Suppliers are encouraged to work with their primary Netflix contact in resolving their concern. If that is not possible or appropriate, reports may also be made by anyone, including Supplier personnel, through Netflix's confidential reporting hotline at www.netflix.ethicspoint.com.

Suppliers must provide their personnel with avenues to confidentially report violations of this Code and Supplier's own Code of Conduct. Suppliers must protect the confidentiality of reports and prohibit retaliation for reports made in good faith.