

A group of four young adults (three women and one man) are smiling and posing for a selfie at night. They are standing in front of a large, brightly lit Ferris wheel. The Ferris wheel has many colorful lights, including blue, green, and red. The background is dark, suggesting it's nighttime. The overall mood is festive and joyful.

# Code of Business Conduct + Ethics

November 2025





# A Message from Nick Woodman

GoPro Family,

Together, we've built a powerfully positive work culture and company thanks in large part to our authentic and honest approach to business. We describe our approach as our "GoPro Code of Honor," or simply "the Code."

The Code exists to help GoPro employees understand what is expected of them, so we can act with confidence and integrity every step of the way. It is essential to how we do business and is our individual obligation to understand and operate according to The Code.

Touching on a variety of topics, the Code covers laws, rules, and regulations (including self-imposed) that we must obey and offers guidance for navigating the complexities of doing business on a global scale. All employees need to be familiar with the Code and how it applies to their role at GoPro. If you're ever in doubt or have a question, just ask.

Thanks for everything you do to make GoPro an awesome place to work — we can all be very proud of what we're building together.

**Nicholas Woodman**  
Founder and CEO



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Although the Code is provided to and governs all members of the GoPro family, including GoPro, Inc. and its subsidiary and affiliates (collectively, “GoPro”), individuals remain employed by their local employing entities only and are additionally subject to the policies and practices of such entity, their individual employment contracts (if any), and applicable law.



# Our Commitment to Integrity.





# Our Code of Honor

## Let honor and integrity lead the way.

At GoPro, we're committed to legal and ethical conduct in every area of business. The Code of Business Conduct and Ethics, also known as "the Code," is a cornerstone of our commitment to integrity.

It summarizes the standards GoPro expects all of us to meet, regardless of location or role.

While efforts have been made to ensure the Code covers the most relevant information, it's impossible to anticipate all of the challenges or questions you might face.

So, in addition to the standards outlined here, ensure your actions are consistent with the laws, regulations and company policies that apply to your specific role and the countries in which you operate.

Employees, executives and members of the board are expected to know and follow the Code. Contractors, agents, sales reps, distributors and partners need to comply with the Code as well whenever conducting business on behalf of GoPro. While the rules within the Code are specific, the sentiment is universal: Whenever in doubt, let honor and integrity lead the way.





# Our Values

- Make friends.
- Obsessively serve.
- Harness the power of WOW.
- Stay agile.
- Be a HERO.





# Rules of the Road

## **Do the right thing.**

Everyone needs to comply with the requirements of the Code when acting on behalf of GoPro.

# Know Our Code

## **Know and follow the rules.**

Part of your job is to know the laws, regulations and company policies that apply to your role and the countries in which you work. Comply with them.

If local laws or policies are more restrictive than those outlined in the Code, follow the more restrictive requirements.

## **Certify annually.**

Revisit the Code often. You will be required to certify annually that you have read, understood and agreed to follow the Code. Read related information in the GoPro Employee Handbook.

Report all concerns of possible violations. Promptly raise any concerns you have about potential violations of the Code. If a concern is not resolved to your satisfaction, talk to Legal or the People Team.

## **Ask questions.**

If you're unsure about the laws, regulations or policies that apply to your job role or the country in which you work, talk to your manager, the People Team or another GoPro management-level resource.





# Rules for Leaders

Managers are expected to be role models—helping to create strong values, a culture of compliance and an ethical workplace.

## Know Our Code

### **Lead by example.**

Take personal responsibility for fostering a team culture that supports ethically sound behavior and creates a sense of real accountability to the Code. Create a work environment where people feel at ease asking questions and raising concerns when they arise.

### **Guide and provide training.**

Take proactive steps to ensure your employees receive adequate guidance and training on the laws, regulations and policies that apply to their roles and the countries in which they work.

### **Be aware and accountable.**

Awareness is key. Ensure accountability and perform and cooperate with compliance reviews.



# Standards of Business Conduct.



# Confidential Information

## **Super important: keep it confidential.**

During your employment at GoPro, you will be entrusted with knowledge and information that's confidential and proprietary. Please recognize this information is company property and is the product of significant financial investments and many years of work. This information is also protected by law, as it holds considerable value for our shareholders, suppliers, partners, customers and the company itself.

The disclosure of this information, whether intentional or accidental, can adversely affect the reputation and financial stability of the company. As a GoPro employee, it's your obligation to know which information is confidential and to follow the policies put in place to protect it. Any unauthorized disclosure or suspected unauthorized disclosure should be reported to the GoPro Legal Department.

## **Know Our Code**

### **Protecting confidential information.**

Don't discuss confidential information in public places, such as airplanes, elevators, break rooms, cafeterias or restaurants and make sure to be aware of your surroundings if you are working from a home office. You must review, understand and follow the Artificial Intelligence (AI) Acceptable Use Policy if you use any non-enterprise AI tools in the course of your work to ensure you do not disclose any GoPro confidential information.

### **Discussing confidential information with colleagues.**

Only discuss confidential information with other employees, contractors, and vendors on a need-to-know basis. If someone requests confidential information, don't be afraid to ask why it's required. Still unsure? Consult your manager or the GoPro Legal Department.

### **Protecting the confidential and personal information of others.**

Before accepting or using the confidential information of customers, suppliers, vendors, contractors and others, ensure an NDA (Non-Disclosure Agreement) is in place.

If one is not in place, contact the GoPro Legal Department for help putting one in place. Individuals' personal information should also be handled with care and in accordance with applicable law at all times.

Treat the confidential or private information of others (such as GoPro customers, partners or suppliers) with the same care that you treat GoPro information. You can do this by instituting controls over record access, proper use and distribution.

### **Competitors and former employees.**

Never use illegal or improper techniques to acquire confidential information from others. Don't solicit confidential information from another company's present or former employees unless it falls under an appropriate disclosure agreement.

### **Managing public and social interactions.**

Avoid accidental disclosure in media. Never post any confidential information about GoPro on the web.

This includes social media outlets like Facebook, LinkedIn, Instagram, Snapchat, Reddit, and personal blogs. Do not talk to the media or analysts unless you are explicitly authorized to do so.

### **Sharing confidential information with business partners.**

Do not discuss or disclose confidential information with customers, suppliers or business partners unless an appropriate confidentiality agreement is already in place and you are explicitly authorized to do so. And if you do share confidential information, only do so on a need to know basis,



# Company Assets

## Use only what you need.

### Protect what you use.

GoPro equips you with the tools and resources to do your job well. In return, you're expected to use them responsibly, avoid waste, and protect them from misuse, theft, or loss.

### Using Equipment and Systems

Company devices—including laptops, phones, and tools—are for business use. Incidental personal use is permitted if reasonable and aligned with company policies.

- Take care of your equipment to extend its life.
- Never use GoPro systems to access, store, or share illegal, offensive, or inappropriate content.
- GoPro may monitor usage of its systems, including email, chat, and web activity.

### Software, Cloud Services, and Licensing

- Use only GoPro-approved software and cloud platforms.
- Do not install unlicensed tools or use personal or freemium services to store or transfer GoPro data.
- If you install licensed software, you are responsible for keeping it updated to reduce cybersecurity risks.
- Open-source tools and libraries must be properly licensed and approved before use.
- If you're unsure whether a tool or service is appropriate, consult IT or your manager.

## Know Our Code

### AI and Emerging Technologies

- Do not enter confidential GoPro data into public or non-enterprise AI tools.
- Review AI-generated content for accuracy, compliance, and licensing.
- Use only approved AI tools and plugins.
- Do not use AI-powered note-taking or transcription tools during web conference meetings unless explicitly approved. Consult Legal before using them.
- Do not use AI to mislead, impersonate, or harm.
- Bots, scripts, or automation tools require prior approval.
- Follow GoPro's AI Acceptable Use Policy when using non-enterprise AI tools.

### Network and Data Security

- Report lost devices or suspected security issues immediately.
- Treat all GoPro data as confidential unless explicitly stated otherwise.
- Use cloud storage carefully—avoid public sharing links or personal cloud providers.
- Do not use anti-forensic tools, anonymizers, or non-GoPro VPNs to bypass monitoring or security controls.

### Physical Asset Protection

Keep company devices, badges, prototypes, and tools secure—especially in public spaces. Report lost or stolen items promptly.

### Company Funds

When spending GoPro funds, ensure costs are reasonable, business-related, and properly documented.

### Intellectual Property

Protect GoPro's trademarks, patents, copyrights, and trade secrets from unauthorized use or disclosure. This responsibility continues after your employment ends.

### What Not to Do

To protect GoPro systems, data, and reputation, the following are strictly prohibited:

- Peer-to-peer file sharing
- Installing or using unlicensed software
- Using anti-forensic or anti-monitoring tools
- Destroying or tampering with GoPro data or resources
- Using non-GoPro VPNs, proxy anonymizers, or TOR-enabled browsers
- Storing GoPro data in personal or freemium cloud services
- Inputting confidential data into public AI tools without approval

If you're unsure whether something is allowed, ask your manager or the IT Department before proceeding.

### Violations and Accountability

Misuse of company assets or violations of this section may result in disciplinary action, up to and including termination, subject to applicable law. For more information, refer to the Code of Conduct's enforcement and reporting guidelines.



# Conflicts of Interest

## Relationships matter.

GoPro understands that you have a life outside of work, and the company values and respects your privacy. However, if your personal, social, charitable or political activities interfere with your loyalty and objectivity toward GoPro, a conflict of interest may exist.

Our policy requires that our business decisions be based solely on the best interests of GoPro and its shareholders. Even when no actual conflict exists, the appearance or perception of a conflict of interest can have negative effects, including the loss of business.

That's why it's important to consider how your actions may appear to those outside of GoPro. Err on the side of caution and disclose any potential conflicts of interest to your manager before engaging in the activity.

## Know Our Code

### Business opportunities.

All employees should deal impartially with suppliers, customers, partners and other persons doing or seeking to do business with GoPro, without preference or favor based on any considerations other than the best interest of GoPro. This includes the giving and receiving of company assets and confidential information.

### Investments and ownership interest.

You are required to disclose if you or a family member has a substantial interest (equal to or greater than 0.5%) in a competitor, supplier or customer, and obtain written approval from the company's Chief Legal Officer and CFO. (Ownership of less than 1% of a public company is not considered a conflict of interest.)

### Compensation, cash and other favors.

Never accept, directly or indirectly, cash, credit, services, payments, loans, personal discounts, gifts or other favors that would be in violation of GoPro corporate policies.

### Director and executive waivers.

Any potential conflicts must be reviewed and approved by the GoPro Legal Department before you engage in the activity. Conflict waivers for directors or executive officers must be approved by the GoPro board of directors or a committee designated by the board of directors.

### Dealings with related parties.

Never conduct GoPro business with a relative (or company in which you or a family member have an interest) on behalf of GoPro without first obtaining written approval from the GoPro Legal Department.

### Serving on boards, panels, etc.

Before accepting a position on a board of directors or an advisory board of another company (including not-for-profits or NGOs), discuss the circumstances of your commitment with your manager, and, in the case of a for-profit company, obtain written approval from the GoPro Legal Department.

### Gifts.

No gift or entertainment should be accepted by any GoPro employee, family member or agent unless it (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe, kickback or payoff, (5) does not violate any laws or regulations, and (6) is not one in a series of small gifts that could be construed as part of a larger gift. The giving of gifts or entertainment should also follow the above guidelines, though customary business practices regarding the threshold for excessive value may at times be higher depending on circumstances.

In any case, employees must adhere to the company's expense policies and International Business Activities Policy. Employees should talk with their managers before giving or receiving gifts or entertainment and should contact the GoPro Legal Department if the gift involves a government official.



# Antitrust + Competition

## Understand the [rules of play](#).

At GoPro, we believe in free and open competition, and we're committed to competing solely on the merits of our products and services. This is the cornerstone of free enterprise, and most of the countries where we do business have laws in place to protect it. These prohibit agreements with competitors, suppliers and customers to fix prices or illegally restrain trade.

Be aware—antitrust and competition laws are strongly enforced and can result in financial penalties and even imprisonment for participating employees. Observe strict adherence to both the spirit and the letter of the law.

## Know Our Code

### Limit contact with competitors.

Do not engage in discussions or activities with competitors that could lead to the appearance of improper behavior.

### Ethical participation in trade and professional associations.

Exercise caution during participation in trade and professional associations. These are legitimate activities; however, these meetings may pose risks, as they often bring you into close company with competitors who might want to discuss sensitive matters that can violate fair competition laws.

### Consultation with the GoPro Legal Department.

Antitrust laws are complex and global in reach, and their application may require you to ask for detailed factual and legal analysis. Before having discussions or interactions with competitors that could appear to be anti-competitive, always consult with the GoPro Legal Department.

### What not to discuss with competitors.

Do not discuss GoPro prices, pricing policies, sales terms, inventory levels, marketing plans or any other confidential matters concerning business, customers or competitive activities with employees or consultants of any GoPro competitors.

### What to do if anti-competitive discussions arise.

- Stop the conversation immediately
- Explain it's against company policy to discuss the matter.
- Leave the meeting or gathering.
- Promptly report the incident to your supervisor and the GoPro Legal Department.

### Appropriate agreements with customers and suppliers.

With the exception of approved exclusivity agreements, never propose or enter into agreements or understandings with customers or suppliers that might restrain trade or violate antitrust or fair competition laws.



# Bribery + Corruption

## Just say no.

This one's pretty simple. We do not bribe. At GoPro, no employee should ever offer, make or authorize a payment or provide a benefit to an individual or a company that's intended to influence or appears to improperly influence a business decision. In addition, no employee should ever request or accept a bribe or a kickback of any sort.

This is true in the case of public officials and government employees and in the commercial sector. Most countries in which we do business have laws against offering anything of value to obtain an unfair business advantage. A few of them even have bribery laws that extend outside their country's borders.

It's also pretty serious. If you violate any bribery or corruption laws, including local laws and the U.S. Foreign Corrupt Practices Act (FCPA), you may be susceptible to substantial fines and penalties, including imprisonment. Please read our International Business Activities Policy before you engage in international business with any third parties.

## Illegal payments.

GoPro prohibits bribes, kickbacks or any other form of improper payment or the appearance of such, whether made directly or indirectly to any representative of a government, labor union, customer or supplier in order to land a contract, secure some other business advantage, or influence or obtain government action.

## Conducting business with third parties.

Our commitment to compliance with anti-bribery and anti-corruption laws extends to the third parties with whom we do business. When dealing with third parties, ensure that you:

- Report all allegations of improper business practices, bribery and corruption relating to third parties.
- Report all allegations of improper business practices, bribery and improper influence on the decisions of a government official.
- Ensure that any person or firm that represents GoPro complies with this policy and all related laws.

## Meals, gifts and favors.

Do not offer meals, entertainment, gifts or favors to any government official without first consulting the GoPro Legal Department. Gifts from customers, partners and suppliers should adhere to the guidelines set out in the Conflicts of Interest section of the Code.

## Marketing and entertainment.

While at GoPro, limit your marketing and client entertainment expenditures to those that are necessary, prudent, job-related and consistent with our policies. If you're unsure if something is acceptable to give or receive, consult the Code, your manager or the GoPro Legal Department.



# Export Controls + Economic Sanctions

## Understand laws around exporting products and technology.

If you ever send any GoPro products, software or other technical information (“GoPro Technology”) outside of the United States or release our technical information to non-U.S. citizens, you need to strictly follow the letter and spirit of export and economic sanctions control laws and regulations. “Sending” GoPro Technology might include, for example, the shipment or electronic transmission of GoPro Technology for beta, quality assurance, demonstration or other purposes.

You don’t even need to be sending GoPro Technology out of the United States for export laws to apply: transmission within the U.S. to certain foreign nationals (i.e. a non-U.S. national or non-permanent resident alien) may require GoPro to obtain an export license or take other steps to comply with the law.

## Think before you export.

Before sending any GoPro Technology outside of the United States or releasing it inside the United States to foreign nationals, remember that this transmission is also subject to GoPro proprietary and confidential information policies. So, think before you export and consult the Legal Department to assure that the transmission of technical information is acceptable under the law and GoPro policy. If you have any questions or think that certain activities may be inappropriate, contact your manager, the GoPro senior leadership team and/or the Legal Department.

## Prohibited countries and regions.

Never send GoPro Technology to any country or region that is subject to U.S. embargoes, including, but not limited to:

- Belarus
- Crimea, Donetsk, and Luhansk regions of Ukraine
- Cuba
- Iran
- North Korea (Democratic People’s Republic of Korea)
- Russia

Additionally, the U.S. Government maintains lists of individuals and organizations that are, in varying ways, off-limits for U.S. companies like GoPro. Never send GoPro Technology to an individual or organization on these lists. Contact the Legal Department with any questions.

## Penalties.

If you don’t follow the law or GoPro policies when transmitting GoPro Technology, the penalties can be quite severe for both you and GoPro. For example, GoPro might be forced to pay fines, lose its export privileges or receive bad publicity. GoPro personnel that fail to comply with export control and economic sanctions control laws and regulation and/or GoPro policy may be subject to discipline, up to and including termination. If intentional violation of export control or economic requirements is found, it might be a criminal offense that carries jail time



# Trading + Insider Information

## **Keep inside information inside.**

Starting on your first day at GoPro, you are considered an “Insider” under our Insider Trading Policy. You may be entrusted with non-public information about our company or a partner company before the information is made public. This is known throughout the industry as “inside information.”

To protect investors and other stakeholders, securities laws (both in the United States and elsewhere) make it illegal for anyone with inside information to buy or sell stocks or other securities. It’s also illegal to share inside information with anyone else who might use this information to trade. Please read our Insider Trading Policy as soon as you start working at GoPro.

Obeying a few basic rules will ensure you are in compliance with the rules and regulations in the Code. If you have a question about how securities trading or inside information applies to you, just ask.

## **Sharing inside information with others.**

Never disclose inside information to others, either inside or outside the company, without a legitimate business need and proper authorization.

## **Buying and selling securities of other companies.**

Do not buy or sell shares of a company with whom GoPro does or is considering doing business with if you’re aware of inside information.

## **Buying and selling GoPro securities.**

Do not buy or sell shares in GoPro, either directly or indirectly, unless we are in an open trading window, and you are not in possession of material non public information about the company.

## **Tipping: Recommending that others buy and sell securities.**

Never recommend or suggest that others buy or sell the securities of any company, including GoPro, if you are aware of inside information.



# Consumer Information

## **Our customers' trust is in your hands.**

In the normal course of business, GoPro collects and uses a wide range of personal information to better serve our customers.

Why is it important? Because it's personal. Most of the countries in which we operate have strict laws governing the use of this information. These laws have the twin purpose of protecting individuals from unauthorized use and providing them with choices about how their personal information is used.

It's your responsibility to ensure consumers' private information stays private. It's also a natural extension of the golden rule.

## **Collecting and using personal information.**

Only collect and use the personal information you need to do your job, and do so only in accordance with GoPro Privacy Policies.

## **Respecting personal choices.**

Respect personal choices regarding the collection, use and disclosure of information. Where appropriate, explain how and why GoPro will use it. Allow employees or customers whose information is held by GoPro to review, update and correct their information or opt out. In some countries, this is even required by law.

## **Limit access to personal information.**

Do not share personal information belonging to someone else with anyone inside or outside of GoPro without a legitimate business need. In such cases, make sure precautions approved by the GoPro Legal Department are taken to make such outside persons aware of the confidential nature of that information and to comply with all applicable laws.

## **Transferring personal information outside its country of origin.**

Always seek the advice of the GoPro Legal Department before authorizing the movement of personal information outside its country of origin.

## **Destroying personal information.**

Once there is no longer a legitimate business need for personal information, you should destroy it in accordance with any applicable records management guidelines and any applicable regulations.

## **Using care when handling personal information.**

Adhere to the highest standards of confidentiality when using and retaining personal information. Never leave records containing personal information in an unsecured location. Never send personal information over the Internet unless it's authorized and encrypted.

## **Questions and concerns.**

If you have any questions or concerns regarding privacy issues, please contact the GoPro Legal Department.



# Employment Principles

## Working Together.

GoPro is a global company and our business is driven by shared experiences. Our success is built on the energy, enthusiasm, collaborative knowledge and efforts of our employees. Each of us should make a point to value one another's contributions and to treat one another with appreciation, dignity and respect—regardless of personal status, characteristics, position or relationship.

As a global company, we are dedicated to building a company that reflects and honors the diverse global communities where we live, work and play. We are committed to a workplace free from discrimination or harassment of any kind. As a GoPro employee, contractor or partner, do your part to foster and maintain this environment—one where everyone feels valued, included and respected.

## Equal employment opportunity.

All employment-related decisions should be based on job qualifications and merit and made without favoritism or discrimination by gender, race, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, veteran status, national origin or any other legally protected status.

## Discrimination, harassment, bias and microaggressions.

Never act in a way that harasses, degrades or discriminates against others, including unwelcome conduct—whether verbal, physical, visual or otherwise—based on gender, race, color, religion or any other legally protected status. And do your best to stay cognizant and minimize any biases or microaggressions that may create a toxic workplace or discriminatory environment at GoPro.

## We don't allow bullying, threats or intimidation.

If you experience or are aware of any bullying, threatening or intimidating conduct of any kind, talk to your manager or the People Team.

## Personal relationships among employees.

Dealings with colleagues should be free of the potential bias that close relationships often bring. Dating relationships between employees who have a reporting relationship need to be disclosed to the People Team. The same applies to family relationships among employees or prospective employees.

## Inappropriate sexual advances.

Never make unwelcome sexual advances or requests for sexual favors, including verbal remarks or physical contact of a sexual nature. Never behave in a violent or threatening manner. Never spread rumors or create an intimidating, hostile or offensive work environment.

## Reporting discrimination or harassment.

If you experience or are aware of discrimination or harassment of any kind, talk to your manager or the People Team. If you would prefer to report anonymously, please use our always-on anonymous feedback tool, AllVoices at [gopro.allvoices.co](https://gopro.allvoices.co). We take all reports of discrimination and harassment seriously and will investigate them thoroughly. If an investigation reveals a violation, corrective action will be taken. GoPro will not tolerate any retaliation for a report made in good faith.

## Paying for work.

We pay for all work performed. Record all of your time accurately. Take the meal and rest breaks to which you are legally entitled and tell us if you are prevented from taking any.



# Financial Records + Internal Controls

## Be diligent. Be accurate. Be compliant.

Maintaining internal controls and ensuring complete, accurate and timely books, records and disclosures is more than a legal requirement at GoPro—it's essential to our success. Our customers, partners, suppliers and investors rely on the information we provide to decide whether to purchase our products, partner with us or invest in our shared future.

As a GoPro employee, you're required to follow the internal controls that apply to your job or function. As a GoPro manager or executive, you're responsible for ensuring that an adequately operating system of internal controls related to your function is in place, is effective, and addresses the company's business needs and compliance requirements.

## Maintaining complete, accurate and timely records.

At GoPro, we require that you accurately record sales, revenues, expenses, operational data, business metrics and other essential company information. This includes:

- Providing complete, accurate and transparent information in all reports, records and expense claims.
- Providing accurate, transparent and complete backup for all expenses.
- Never deliberately making a false, artificial or misleading entry in a report, record or expense claim.
- Always disclosing to your immediate manager or executive any information that may impact our financial records, our relationship with partners or the company's reputation.
- Never establishing or maintaining an undisclosed or unrecorded side agreement, account, fund or asset.

## Compensation, cash and other favors.

Never accept, directly or indirectly, cash, credit, services, payments, loans, personal discounts, gifts or other favors that would be in violation of GoPro corporate policies.

## Managing records.

Always comply with any applicable policies and guidelines regarding the retention and destruction of records and documents, including Legal Hold Orders relating to company litigation, subpoenas or other legal processes.

Never destroy or alter any document in anticipation of or in response to a request by any government agency, court or third party you reasonably suspect may initiate litigation against GoPro. Before you dispose of any document, make sure it's not subject to retention under a Legal Hold Order by contacting the GoPro Legal Department.

## Following general accounting procedures.

Consult and follow the GoPro Financial Reporting and Accounting Policies at all times and implement sufficient controls to ensure compliance. For more information on accounting policies and internal controls, please contact the GoPro Finance and Accounting Departments. You can also consult the Internal Audit department for guidance on implementing controls in your department.

## Reporting concerns.

If you're uncertain about the validity of any entry, data, record or report (or if you are asked to create any false or misleading entry, data, record or report), immediately report it to the GoPro Legal Department and Internal Controls management.

GoPro has set up a whistle blower hotline (877-214-7816) for the confidential and anonymous reporting of any suspected financial irregularities or related concerns. You can also report concerns online at [whistleblowerservices.com/gpro](https://whistleblowerservices.com/gpro).



# Questions + Concerns.





# Have a Question?

## **We're here to help.**

If you have a question, we'll do our best to answer it. We strive to create an environment where you feel comfortable voicing your concerns.

While there are several resources available (this document being one), we encourage you to raise questions or express concerns about issues related to the Code with your manager or the People Team.

If you prefer, you can also direct questions specifically to the Chief Legal Officer or the head of the People Team.

# Reporting a Suspected Violation

## **Awareness is key.**

### **Acting on it, even more so.**

If you become aware of a suspected or actual violation of the Code, you do have a responsibility to report it. Both you and GoPro will be best served by bringing the concern into the open. In this way, problems can be resolved quickly and more serious harm can be prevented.

Our promise: GoPro will not tolerate any retaliation against any employee who acts in good faith in reporting any violation of the Code. We prefer you openly provide all pertinent information when making a report, but you also have the option to make a report anonymously.

# Who to Contact

## **Your manager or People Team business partner.**

In most cases, your manager or People Team partner will be in the best position to resolve the issue quickly.

You can also report harassment, discrimination or other issues anonymously at [gopro.allvoices.co](https://gopro.allvoices.co).

## **Head of the People Team or the General Counsel.**

If the issue is not resolved after raising an ethical or conduct concern, raise it with the head of the People Team or the General Counsel (Legal Department).

## **The whistleblower hotline.**

To report any financial irregularities as set forth in the Financial Records + Internal Controls section, you may also use the whistleblower hotline or website.

**Hotline: 877-214-7816**

**Website: [whistleblowerservices.com/gpro](https://whistleblowerservices.com/gpro)**





# Penalties for Violations

## **This is serious stuff.**

Here's where the rubber meets the road. Officers and employees who violate any law, governmental regulation or the Code will face appropriate disciplinary action, which may include demotion or termination, subject to applicable law.

Why do we take this stuff so seriously? Violating the Code may violate local laws, subjecting the employee and GoPro as a company to criminal penalties (fines or prison sentences) or civil sanctions (damage awards or fines).

In addition, you may be faced with disciplinary action in accordance with applicable law if you:

- Fail to cooperate with investigations and inquiries.
- Knowingly make a false allegation against someone.
- Direct or encourage others to violate laws, regulations or company policies
- Willfully ignore inappropriate or illegal actions of people who report to you.
- Retaliate against another employee for raising a genuine concern, reporting misconduct in good faith or participating in an investigation.
- Withhold information or knowingly provide false or misleading information.

# Our No-Retaliation Rule

At GoPro, we're committed to creating a culture of stand-up people. If you see something that's not right, don't just look the other way—take action.

If you see something that's in violation of the Code and report it, retaliation will not be tolerated. That's our no-retaliation rule. Any employee who raises a real concern, reports misconduct in good faith or participates in an investigation is doing the right thing and will have the full support of GoPro.

## **Always act in good faith.**

Only provide information that you genuinely believe to be honest and accurate, even if you're later proven to be mistaken. Never intentionally misreport or otherwise make a report in bad faith.

## **All claims of retaliation are investigated.**

GoPro takes all claims of retaliation seriously. Allegations will be investigated and, if substantiated, those responsible will be subject to disciplinary action, up to and including termination of employment.

## **Support those who stand up.**

Always support the individuals who are brave enough to come forward. Never engage in behavior that alienates or intimidates them. If you believe that someone has been retaliated against, report it to your manager or to the People Team.



**Thank you.**