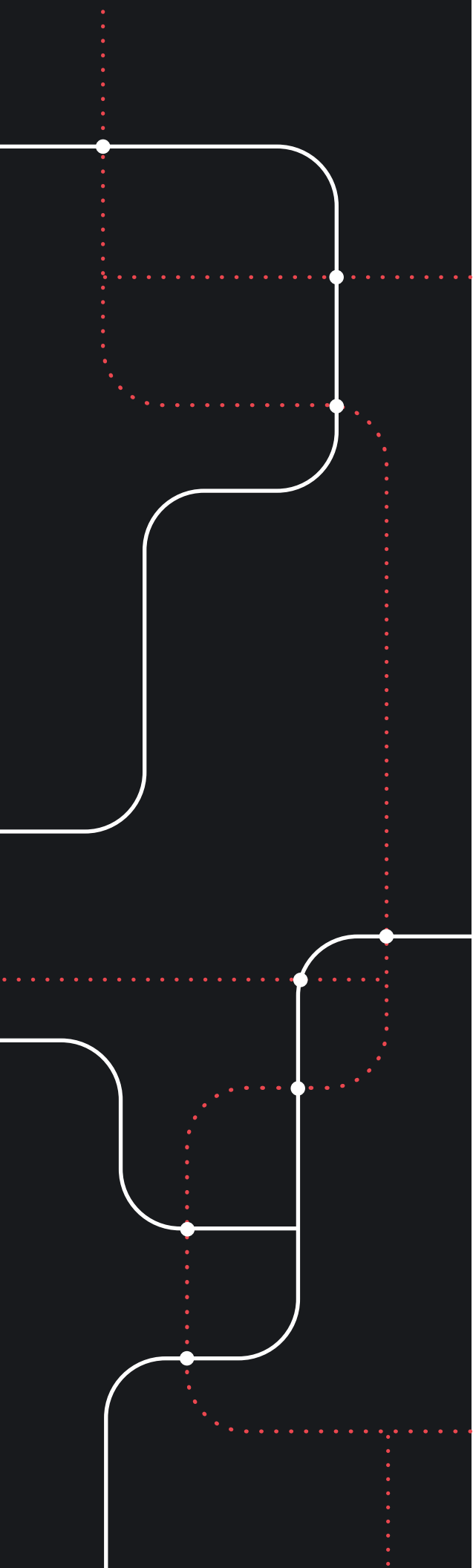


EFFECTIVE DECEMBER 2022



# SUPPLIER CODE OF CONDUCT



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- Comply with applicable laws and regulations; establish legal requirements as minimum standards
- Comply with global trade and customs laws
- Prohibit insider trading

**CONDUCT BUSINESS  
WITH INTEGRITY**

- Compete fairly
- Prohibit bribes, improper payments and inappropriate gifts and entertainment
- Avoid conflicts of interest
- Respect data privacy and information security
- Protect Peloton's confidential information and ideas and respect IP rights
- Ensure accuracy in books and records

**TREAT PEOPLE WITH  
DIGNITY AND RESPECT**

- Respect human rights and prohibit human trafficking
- Respect freedom of association and collective bargaining
- Promote and support diversity, equity, and inclusion
- Adhere to wage and working hour regulations

**MAINTAIN A SAFE AND  
HEALTHY WORKPLACE  
AND SUSTAIN  
PRODUCT SAFETY**

- Comply with health and safety laws and ensure clean and safe working conditions
- Promote Peloton's commitment to product safety
- Monitor and limit materials and substances of concern

**BE A RESPONSIBLE  
GLOBAL CITIZEN**

- Comply with environmental laws, regulations and permits
- Strive to reduce environmental impacts, greenhouse gas emissions, consumption of water and waste
- Work with Peloton to implement sustainable processes to drive continuous improvement
- Responsibly source conflict minerals

# PELOTON'S MISSION IS TO USE TECHNOLOGY AND DESIGN TO CONNECT THE WORLD THROUGH FITNESS, EMPOWERING PEOPLE TO BE THE BEST VERSION OF THEMSELVES ANYWHERE, ANYTIME.

We can achieve our mission only by working closely with our suppliers, and we choose to partner with suppliers who share our value of operating in a safe, responsible, and sustainable way. Our Supplier Code of Conduct (Code) reflects our expectations for how Suppliers will operate to help us fulfill our mission—ethically and in compliance with applicable laws.

## OUR GUIDING PRINCIPLES

Peloton's five Guiding Principles provide a foundation for our global operations:



**WE COMPLY WITH LAWS AND REGULATIONS.**



**WE MAINTAIN A SAFE AND HEALTHY WORKPLACE AND SUSTAIN PRODUCT SAFETY.**



**WE CONDUCT BUSINESS WITH INTEGRITY.**



**WE ARE RESPONSIBLE GLOBAL CITIZENS.**



**WE TREAT PEOPLE WITH DIGNITY AND RESPECT.**

Our Supplier Code of Conduct extends these same principles to Peloton suppliers, wherever they are located, whenever they are producing products for use by our Members or components that are incorporated in our products, and wherever services are performed for us (collectively, "Suppliers").



This Code applies to Suppliers' employees, workers, agents, and representatives, as well as their own suppliers and subcontractors, when providing products or services to Peloton.

## RESPONSIBILITIES OF PELOTON SUPPLIERS

You, as a Supplier to Peloton, agree to:

### COMPLY WITH LAWS AND REGULATIONS:

We expect our Suppliers to share our commitment to following the law.



#### WE EXPECT OUR SUPPLIERS TO:

- Operate in full compliance with all applicable laws and regulations of the countries in which they operate, and in compliance with this Code.
- Promptly alert Peloton to any material issues with the goods or services supplied to Peloton, especially involving product safety or human health and safety.
- Abide by all applicable U.S. and international trade laws and regulations, including import and export control regulations, anti-boycott laws, legally enacted embargoes, and economic sanctions.
- As a Peloton supplier, you may have access to material, non-public information about Peloton. Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a company's securities. Suppliers may not trade in Peloton securities while in possession of material, non-public information or provide such information to others who trade on it.



### CONDUCT BUSINESS WITH INTEGRITY:

We seek out business relationships based on trust, transparency, and mutual accountability.

#### WE EXPECT OUR SUPPLIERS TO:

- Compete fairly and ethically for Peloton's business, in compliance with competition laws wherever they operate and wherever Peloton products or services are offered for sale.
- Comply with global anti-bribery and anti-corruption laws. Peloton strictly prohibits the receipt, offer or payment of bribes, kickbacks, facilitation payments or the exchange of anything of value (directly or indirectly) intended to advance Peloton's business interests or to provide undue or improper advantages for Peloton or you. Peloton has zero tolerance for bribery and corruption of any kind and in any form. Never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Peloton's business activities.
- Avoid any conflict of interest or even the appearance of a conflict of interest relating to financial interests or other arrangements that may be considered inappropriate.

- Adopt and maintain security processes and controls to protect data and confidential information at all times. Secure all personal data that you may collect, receive, store, or handle in connection with products or services provided to Peloton, and comply with all applicable privacy, data protection, and information security laws and regulations.
- Safeguard all Peloton confidential information in any form and maintain appropriate processes to protect Peloton's confidential information from disclosure.
- Respect and protect the intellectual property rights of Peloton and other third parties.
- Ensure that their suppliers, service providers and other business partners have ethical business practices that are similar to Peloton's practices.
- Keep and maintain books and records that accurately describe the goods and services provided or delivered to Peloton, and ensure that all documents, communications, and accounting practices are accurate and honest.

## TREAT PEOPLE WITH DIGNITY AND RESPECT:

**We expect our Suppliers to prioritize the well-being and dignity of all persons, whose talents and hard work help us to deliver world-class fitness products and services.**



### WE EXPECT OUR SUPPLIERS TO:

- Prohibit harassment and abuse, including sexual harassment, intimidation, or discrimination based upon race, color, religion, age, gender, sexual orientation, gender identity, national origin, disability, veteran status, association, pregnancy, or any other status protected by local law, including in hiring and promotion practices.
- Never use or tolerate any form of forced labor or human trafficking, or child labor as defined by the International Labor Organization (ILO). All persons engaged in labor on behalf of suppliers or any of their customers must be at least 16 years old, or the age required by applicable local law, if higher than 16.
- Ensure all workers receive equal treatment in aspects of employment.
- Meet or exceed all applicable wage and hour laws, including those relating to minimum wage, overtime, and any associated legally mandated benefits.
- Respect employees' rights to associate freely and bargain collectively.
- Never place unreasonable restrictions on workers' freedom of movement or withhold workers' government-issued identification or travel documents.
- Support diversity, promote gender equity, and base employment relationships on the principles of equal opportunity.



## MAINTAIN A SAFE AND HEALTHY WORKPLACE AND SUSTAIN PRODUCT SAFETY:

**Suppliers are expected to maintain a clean, safe, and healthy work environment in compliance with applicable legal and regulatory standards and adhere to Peloton's commitment to ensure they supply world-class fitness products that are as safe as they are useful.**

### WE EXPECT OUR SUPPLIERS TO:

- Provide a clean, safe, and healthy work environment in compliance with all applicable legal requirements and consistent with Peloton's standards for our Suppliers.
- Provide access to sanitary facilities, adequate ventilation, clean restrooms, safe and accessible fire safety exits, and potable drinking water.
- Encourage and provide means for workers to raise any health or safety concerns, and promptly investigate and remediate as necessary, and prohibit retaliation against workers for escalating such concerns.
- Meet Peloton's global product safety and quality requirements and all applicable regulatory requirements and third party consensus safety standards with respect to products, materials and chemicals. Cooperate at all times with any safety-related matters and initiatives.
- Obtain prior written approval from Peloton to use subcontractors to manufacture products or components that contain Peloton's trademark or tradename.

## BE A RESPONSIBLE GLOBAL CITIZEN:

**We count on our Suppliers to help Peloton create a better future in a safe, responsible, and sustainable way.**



### WE EXPECT OUR SUPPLIERS TO:

- Comply with all local environmental laws applicable to the workplace, the products produced, and the methods of manufacture.
- Maintain adequate processes to enable sufficient knowledge of input materials and components to reasonably assure that they were obtained from permissible sources in compliance with applicable laws and regulatory requirements, including those relating to conflict minerals.
- Identify opportunities to improve energy efficiency and minimize energy consumption.
- Strive to reduce environmental impacts through efforts such as reducing, tracking, and documenting greenhouse gas emissions; minimizing the use of water in their own operations and avoiding contamination; promoting the use of processes and materials that support environmental sustainability. Support Peloton in its efforts to publicly report on carbon emissions in their operations.
- Take concrete steps to minimize or eliminate waste across their manufacturing operations and those of their suppliers; any waste, and in particular hazardous waste, must be managed in accordance with applicable regulatory requirements.

## OUR GOAL: TRUST AND VERIFY

We expect our Suppliers to follow these five Guiding Principles and to cooperate with our requests for information, certifications, and/or audit access.



Peloton will take appropriate measures, through inspections of Suppliers' sites, to ensure compliance with this Code. Suppliers must allow employees from Peloton access to facilities upon request, including without limitation, records demonstrating compliance with the expectations of this Code.

Suppliers are expected to take corrective actions to promptly remedy any identified noncompliance. Peloton reserves the right to terminate its business relationship with any Supplier who is unwilling or unable to comply with this Code.



Failure to comply with this Code will result in a review of our business relationship, up to and including termination of the Supplier's relationship with Peloton according to our contractual rights and applicable law.

### HOW TO RAISE A QUESTION OR CONCERN:

Suppliers must inform Peloton promptly of any concern related to this Code affecting Peloton, whether the concern involves the Supplier, an agent of the Supplier, a Peloton team member, or another party to the supply chain. Suppliers also must take such steps as Peloton may reasonably request to assist Peloton in the investigation of any reported concern.

Peloton maintains an **Integrity Helpline** through an external third-party, which is available online or by phone 24 hours a day, seven days a week. You can submit a confidential concern or report a potential violation, including anonymously.

Peloton prohibits any retaliation against its Suppliers for reporting a concern regarding a violation of this Code. We handle all reports promptly, fairly, and as confidentially as possible.