



CODE OF BUSINESS CONDUCT AND ETHICS



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OVERVIEW OF THE CODE



WHO IS COVERED BY OUR CODE

WHO IS COVERED BY OUR CODE?

- Our Code applies to the directors, officers and employees of Eventbrite, Inc. and its subsidiaries (the “Company”).
- Individuals who violate our Code may be subject to disciplinary action, up to and including termination.

WHAT IS NOT COVERED BY OUR CODE?

- This Code is a statement of certain fundamental principles, policies and procedures that govern the Company’s directors, officers and employees in the conduct of the Company’s business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity.

WHO ADMINISTERS AND INTERPRETS THE CODE?

- The General Counsel who has been appointed as Eventbrite’s Compliance Officer under the Code.

WHY WE HAVE A CODE

WHY DO WE HAVE A CODE?

- To help you make ethical and legal decisions when conducting the Company’s business and performing your day-to-day duties.
- To set behavior expectations among all Britelings and to provide guidance in the event questions or concerns arise.
- This Code is not exclusive and is not intended to reduce or limit other obligations you may have with the Company.
- Since we operate globally, our Britelings might be subject to additional legal requirements in their own jurisdictions.

WHEN AND HOW TO SPEAK UP

WHAT ARE YOUR OBLIGATIONS?

- If you believe that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code or any law, rule or regulation applicable to the Company, you are obligated to bring the matter to the attention of the Company.
- To act proactively by asking questions, seeking guidance and reporting suspected violations of the Code or any law, rule or regulation applicable to the Company.

HOW DO YOU BRING A MATTER TO THE ATTENTION OF THE COMPANY?

- In most cases, your manager should be your first point of contact. They are likely in the best position to understand your concern and take the appropriate action.
- If the conduct in question involves your manager, if you are uncomfortable speaking with your manager, or if you have already shared a concern and feel it’s not being addressed appropriately, please reach out to the General Counsel.
- If your concern is about a company officer or director, please reach out to the General Counsel, Chief People Officer (if the concern is regarding the General Counsel), or the Lead Independent Director of the Board of Directors.
- You may also speak up via the reporting channels listed in the following section.

WAYS TO SPEAK UP

REPORTING CHANNELS TO REPORT POTENTIAL VIOLATIONS OF THE CODE OR TO CONTACT THE GENERAL COUNSEL:

- Via email: complianceofficer@eventbrite.com
- Via phone: 800-916-7037 (Whistleblower Hotline)
- In writing: 95 Third Street, 2nd Floor, San Francisco, CA 94103
- Online: Whistleblower online report
 - » [English](#)
 - » [Portuguese](#)
 - » [Spanish](#)
 - » [Dutch](#)
 - » [German](#)

REPORTING ACCOUNTING AND SIMILAR CONCERNS

- Potential violations relating to accounting, internal accounting controls, auditing or securities law matters should be directed to the Audit Committee (or a designee of the Audit Committee). Officers and employees can also communicate directly with the Audit Committee by any of the methods listed in this Section.

DIRECTOR COMMUNICATIONS

- In addition to the foregoing methods, a director can also communicate concerns or seek advice with respect to the Code by contacting the Board through the Lead Independent Director, Chairman of the Board or the Audit Committee.

Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of any policy, procedure, law, rule or regulation.

IMPORTANT CONSIDERATIONS WHEN SPEAKING UP

WHAT ARE YOUR OBLIGATIONS WHEN SPEAKING UP?

- To cooperate with the Company in any investigation of a potential violation of the Code or any other policy, procedure, law, rule or regulation.
- You may not use the reporting channels in bad faith or in a false or frivolous manner or to report grievances that do not involve the Code or other ethics-related issues.

CAN YOU REMAIN ANONYMOUS WHEN SPEAKING UP?

- An officer or employee who wishes to remain anonymous may do so, and the Company will use reasonable efforts to protect confidentiality, subject to applicable law, regulations and legal proceedings.
- However, please note that (i) the Company prefers that officers or employees identify themselves to facilitate the Company's ability to take steps to address the suspected violation and (ii) the Company may not have sufficient information to investigate or evaluate the allegations if the employee remains anonymous.

CAN SOMEONE RETALIATE AGAINST YOU FOR SPEAKING UP?

- The Company forbids any retaliation against any officer or employee who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct.
- The Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against such an officer or employee. Anyone who participates in any such conduct is subject to disciplinary action, up to and including termination.

STANDARDS OF CONDUCT





PROMOTING A POSITIVE WORK ENVIRONMENT

WHAT ARE EVENTBRITE'S COMMITMENTS?

- To create a discrimination-free work environment.
- To maintain a culture of diversity.
- To make all employment decisions based on a principle of mutual respect and dignity consistent with applicable laws.

WHAT ARE YOUR OBLIGATIONS?

- To create a respectful workplace culture that is free of (i) harassment, (ii) intimidation, (iii) bias and (iv) unlawful discrimination.



Atlas Obscura Society / Cat Articulation Workshop / LA

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

WHAT ARE YOUR OBLIGATIONS?

- To comply with all laws, rules and regulations applicable to the Company wherever it does business.
- To use good judgment and common sense when complying with laws, rules and regulations and to ask for advice when uncertain about them.
- To report violations of **any** law, rule or regulation by anyone doing business on behalf of the Company to your supervisor or the General Counsel.
- To not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee who has reported a violation, unless it is determined that the report was made with knowledge that it was false.
- To cooperate with government inquiries with the advice from the Legal team.

WHAT IS THE CODE NOT INTENDED TO DO?

- To discourage you from reporting any illegal activity, including violations of applicable laws, rules and regulations.
- To prohibit you from testifying, participating or otherwise assisting in any proceeding or investigation.



CONFLICTS OF INTERESTS

What is a conflict of interest?

When a director's, officer's or employee's personal interest interferes with the Company's interests (e.g. receiving or a family member receiving personal benefit as a result of the director's, officer's or employee's position with the Company).

WHAT ARE YOUR RIGHTS?

- To engage in outside activities that you may deem proper and desirable, provided that these activities do not impair or interfere with the performance of your duties to the Company or your ability to act in the Company's best interests.

WHAT ARE YOUR OBLIGATIONS?

- To avoid situations that present a potential or actual conflict between your personal interests and the Company's interests or that may make it difficult to perform your work objectively and effectively.
- To report to the General Counsel any material transaction, responsibility, obligation or relationship that reasonably could be expected to give rise to a conflict of interest. The General Counsel may notify the Board of a committee of the Board as the General Counsel deems appropriate.
- However, any actual or potential conflicts of interest involving the General Counsel should be disclosed directly to the Chief Executive Officer.

INSIDER TRADING

WHO DOES THIS STANDARD APPLY TO?

- Eventbrite employees, officers and directors who may have material non-public information about the Company or other companies, including our suppliers and customers, as result of their relationship with the Company.

WHAT ARE YOUR OBLIGATIONS?

- To comply with the Company's Insider Trading Policy, which can be found [here](#).

If you are uncertain about the constraints on your purchase or sale of any Company securities or the securities of any other company you are familiar with by virtue of your relationship with the Company, you should consult with the General Counsel before making any such purchase or sale.

CONFIDENTIALITY

WHAT ARE YOUR OBLIGATIONS?

- To maintain the confidentiality of confidential information entrusted to you by the Company or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally mandated.
- To take appropriate precautions to ensure that confidential or sensitive business information is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company.
- To not discuss internal Company matters with, or disseminate internal Company information to, anyone outside the Company, except as required in the performance of your Company duties and, if appropriate, after a confidentiality agreement is in place.

RULES ABOUT INQUIRIES FROM THE MEDIA, MARKET PROFESSIONALS AND SECURITY HOLDERS CONCERNING EVENTBRITE

- All responses must be made only by the Company's authorized spokespersons.
- You must decline to comment and refer the inquirer to your supervisor or one of the Company's authorized spokespersons.

You also must abide by any lawful obligations that you have to your former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company and non-competition obligations.

For more information, please consult the Company's Disclosure Policy, which is available on the Company's Intranet.



Macoletta Williamsburg Pizza Making Class / Brooklyn, NY

HONEST AND ETHICAL CONDUCT AND FAIR DEALING

WHAT ARE YOUR OBLIGATIONS?

- To endeavor to deal honestly, ethically and fairly with the Company's suppliers, customers, competitors and employees.
- To not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

RULES ABOUT STATEMENTS REGARDING EVENTBRITE'S PRODUCTS AND SERVICES

- Statements must **not** be untrue, misleading, deceptive or fraudulent.

PROTECTION AND PROPER USE OF CORPORATE ASSETS

WHAT ARE YOUR OBLIGATIONS?

- To protect the Company's assets and ensure their efficient use.
- To use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of anyone else.

WHAT ARE EVENTBRITE'S ASSETS?

- Intellectual property rights;
- Information systems;
- Computers;
- Servers;
- Other equipment and property of value.

Please note that theft, carelessness and waste have a direct impact on the Company's financial performance.

CORPORATE OPPORTUNITIES

WHAT ARE YOUR OBLIGATIONS?

- To advance the Company's legitimate business interests when the opportunity to do so arises.

WHAT ARE YOU PROHIBITED FROM DOING?

- To divert to yourself or to others any opportunities that are discovered through the use of the Company's property or information or as a result of your position with the Company, unless that opportunity has first been presented to, and rejected by, the Company.
- To use the Company's property or information or your position for improper personal gain.
- To compete with the Company.

Please note that the Company renounces any opportunity that is presented to, or acquired, created or developed by, or which otherwise comes into the possession of any director who is not an employee of the Company, unless such opportunity is presented to, or acquired, created or developed by, or otherwise comes into the possession of, a director expressly and solely in such director's capacity as a director of the Company.



Ultra Australia / Sidney Myer Music Bowl / Melbourne, AUS

NO CORPORATE LOANS OR GUARANTEES

WHAT IS EVENTBRITE'S POLICY?

- The Company will not make loans or guarantees of obligations to directors, officers, employees and members of their immediate family.

POLITICAL CONTRIBUTIONS/GIFTS

WHAT ARE YOU PROHIBITED FROM DOING?

- To use any Company funds for political contributions of any kind without the approval of the General Counsel.

RULES ABOUT POLITICAL CONTRIBUTIONS/GIFTS

- All political contributions proposed to be made with the Company's funds must be coordinated through and approved by the General Counsel.
- If you make a personal political contribution or gift, you may **not** represent that you are making such contribution on the Company's behalf.

For specific questions, please contact the General Counsel.

BRIBES, KICKBACKS AND OTHER IMPROPER PAYMENTS

WHAT ARE YOU PROHIBITED FROM DOING?

- To offer bribes, kickbacks or other improper payments, transfers or receipts.
- To offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment.

INTERNATIONAL TRADE CONTROLS

WHAT ARE INTERNATIONAL TRADE CONTROLS?

- Many countries regulate international trade transactions, such as imports, exports and international financial transactions and prohibit boycotts against countries or firms that may be “blacklisted” by certain groups or countries.

WHAT IS EVENTBRITE’S POLICY?

- To comply with these regulations and prohibitions even if compliance may result in the loss of some business opportunities.

WHAT ARE YOUR OBLIGATIONS?

- To learn and understand the extent to which international trade controls apply to transactions conducted by the Company.



ACCURACY OF RECORDS

WHAT ARE YOUR OBLIGATIONS?

- To honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports.

RULES ABOUT EVENTBRITE'S RECORDS

- All Company books, records and accounts shall be maintained in accordance with applicable regulations and standards and accurately reflect the true nature of the transactions they record.
- The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies.
- No undisclosed or unrecorded account or fund shall be established for any purpose.
- No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

Please note that accurate information is essential to the Company's ability to meet legal and regulatory obligations.

QUALITY OF PUBLIC DISCLOSURES

WHAT IS EVENTBRITE'S POLICY?

- To provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission and in other public communications.

COMPLIANCE PROCEDURES



All In Together Now / A 36 course Wu-Tang Clan inspired event / Seattle, WA

COMMUNICATION OF THE CODE

WHAT ARE EVENTBRITE'S COMMITMENTS?

- To provide all directors, officers and employees with a copy of the Code.
- To provide future directors, officers and employees with a copy of the Code when beginning service at the Company.
- To promptly supply updates of the Code to directors, officers and employees when adopted

WHAT ARE YOUR OBLIGATIONS?

- To review and sign an acknowledgement regarding the Code on a periodic basis.
You can obtain a copy of the Code from human resources or by accessing the Company's website at investor.eventbrite.com.

MONITORING COMPLIANCE AND DISCIPLINARY ACTION

WHO MONITORS COMPLIANCE WITH THE CODE?

- The Company's management, under the supervision of its Board or a committee of the Board or, in the case of accounting, internal accounting controls, auditing or securities law matters, the Audit Committee of the Board.

WHAT ARE EVENTBRITE'S OBLIGATIONS?

- To take reasonable steps to (i) monitor compliance with the Code, and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.
- To periodically report to the Board or a committee of the Board on the Company's compliance efforts including, without limitation, alleged violations of the Code and the actions taken with respect to violations.

WAIVERS AND AMENDMENTS



Trap Yoga Bae / Trap Yoga Brooklyn / Brooklyn, NY

WAIVERS

- No waiver of any provisions of the Code for the benefit of a director or an executive officer (which includes, without limitation, the Company's principal executive, financial and accounting officers) shall be effective unless such waiver is (i) approved by the Board, or, if permitted, the Audit Committee, and (ii) if required, promptly disclosed to the Company's securityholders in accordance with applicable U.S. securities laws and the NYSE rules and regulations.
- Any waivers of the Code for the benefit of an employee (other than a director or executive officer) may be made by the General Counsel, the Board or, if permitted, the Audit Committee.

AMENDMENTS

- All amendments to the code must be approved by the Board and, if required, must be promptly disclosed to the Company's securityholders in accordance with applicable U.S. securities laws and the NYSE rules and regulations.



Soulful Sundays / SoufulofNoise / Lucky Strike Hollywood, LA