



Code of Conduct

Purpose

Figma's Code of Conduct (the "Code") sets out Figma's core values and the way we put them into practice. Our Code supports our overall commitment to create a friendly, inclusive and safe workplace for everyone and serves as a guide to ethical and responsible business conduct. We created it because we believe that articulating our values and obligations to one another reinforces the already exceptional level of respect among the team and because having a Code provides us with clear avenues to correct our culture should it ever stray from that course.

It is your responsibility to read and understand this Code and to use it as a guide to the performance of your responsibilities for Figma, Inc. (the "Company," "us" or "we"). This Code cannot address every ethical issue or circumstance that may arise, so, in complying with the letter and spirit of this Code, it is your responsibility to apply common sense, together with high personal standards of ethics, honesty and accountability, in making business decisions where this Code has no specific guideline. In addition, we expect you to comply with all other Figma policies and procedures that may apply to you, many of which supplement this Code by providing more detailed guidance.

Scope

This policy applies to all employees, directors, and contractors of Figma, Inc. and its affiliates around the world. It also applies to our interactions in various areas of our shared professional lives, including but not limited to the office, off-site company events, our Slack and email exchanges, social media, and conferences or other events where we represent Figma.

Raising Issues and Concerns

You should report any suspected violations of laws, rules, regulations or this Code immediately by following Figma's Compliance Reporting Policy. If you have questions or concerns, you can reach out to:

- Your manager
- Your People Partner or Figma's Chief People Officer; or
- Figma's General Counsel

If you prefer to make a report to Figma's third party ethics hotline (either with your name or anonymously), you may contact 844-527-0577 or via figma.ethicspoint.com. Please review Figma's Compliance Reporting Policy for additional detail.

Figma does not tolerate retaliation. You will not get in trouble for any concerns that are raised in good faith. Figma will promptly investigate potential violations. Violations of this Code or other Figma policies may lead to disciplinary action, up to and including termination.

Our Values

Build community

We're multiplayer people, and we love the weird, wonderful magic that happens when humans connect. We bring people together so they can bring new ideas to life.

It means:

- Creating warm, inclusive spaces where everyone feels welcome
- Building bridges between Figma and our users
- Sharing creative projects and obsessions so we can inspire each other

Run with it

When you see something that needs doing, do it. When you have a great idea, run with it. Tackle big, scary, exciting challenges like Figma's future depends on it.

Because it does.

It means:

- Taking initiative and being bold
- Seeking feedback without getting paralyzed by input
- Hitting deadlines and keeping things moving

Love your craft

We build for builders, and try to make complex things feel simple. In our products and process, we invest in the details few people see, but everyone feels.

It means:

- Finding joy in the things we make
- Paring everything down to its essence
- Making thoughtful trade-offs between business goals and customer needs
- Using first principles to clarify problems and rethink assumptions

Grow as you go

Everyone's a work in progress, and we're here to help each other grow. So along with ♥ and 🙌, we share the direct feedback we all need to become great at what we do.

It means:

- Staying humble and curious
- Having the courage to give and get constructive feedback
- Remaining optimistic when things get tough
- Being flexible and embracing ambiguity

Play

Playing is learning. We embrace spontaneous, unstructured exploration—because that’s where we find our best ideas.

It means...

- Making time to experiment and imagine
- Valuing inputs as much as outputs
- Finding ways to bring fun and lightness into work

Expected Behavior

Every member of the Figma team is expected to work hard, be considerate of their colleagues across the Company, and contribute to a collaborative, positive, and healthy environment in which we can all succeed.

Be supportive of your colleagues, both proactively and responsively. Offer to help if you see someone struggling or otherwise in need of assistance (taking care not to be patronizing or disrespectful). If someone approaches you looking for help, be generous with your time; if you’re under a deadline, direct them to someone else who may be of assistance. Go out of your way to include people in team jokes or memes, recognizing that we want to build an environment free of cliques.

Follow all applicable laws and Figma policies, and always act with integrity. As a representative of Figma, you must adhere to and abide by all applicable laws. We expect you to act with integrity at all times.

Be welcoming. We strive to be a workplace that welcomes and supports people of all backgrounds and identities.

Be collaborative. Involve your colleagues in brainstorming, design sessions, code reviews, planning documents, and the like. It’s not only okay to ask for help or feedback often, it’s unacceptable not to do so. Recognize that in addition to asking for feedback, you are similarly obligated to give it.

Be respectful. Your communications with others – whether in person or online – must always remain respectful and must not disrupt business operations or jeopardize anyone’s health, safety, or security. When we disagree, try to understand why. Disagreements, both social and technical, happen all the time and Figma is no exception. Be aware of your audience and how they are receiving your feedback. Remember that we’re all different and the strength of Figma comes from

its varied community with people from a wide range of backgrounds. Different people have different perspectives on issues. If you're unable to understand why someone holds a viewpoint that doesn't mean they're wrong. Endeavor to create an inclusive culture supporting diverse opinions. Don't forget that it is human to err and blaming each other doesn't get us anywhere. Instead, be solution oriented and help others grow.

Be human. Take time to get to know your colleagues as individuals. Find the commonality that will help your working relationship.

Be mindful of our remote colleagues. Whether you are working remotely or from a hub, adopt habits that are inclusive and productive for team members wherever they are: make liberal use of video, using a conference room where possible so that everyone, whether remote or in-house has the same interactive experience. If a conference room is not available, have everyone involved in a meeting with a remote worker jump on the video so that all faces can be seen by everyone. Document meetings and decisions thoroughly, and pay attention to time zones when scheduling events.

Be kind, inclusive, and professional. We are a community of professionals, and we conduct ourselves professionally. Be kind to others. Do not insult or put down other participants. Harassment and other exclusionary behavior aren't acceptable.

Be security conscious. You are responsible for following all of Figma's Information Security and Data Privacy policies at all times.

Respect Each Other

Discrimination, Harassment, Equal Opportunity

At Figma we celebrate and support our differences. We know employing a team rich in diverse thoughts, experiences, and opinions allows our employees, our product and our community to flourish. Figma is an equal opportunity workplace - we are dedicated to equal employment opportunities regardless of race, color, ancestry, religion, sex, national origin, sexual orientation, age, citizenship, marital status, disability, gender identity/expression, veteran status, or any other characteristic protected by applicable law. We also consider qualified applicants regardless of criminal histories, consistent with legal requirements.

Figma is committed to providing a safe and respectful work environment free from threats, violence, harassment, and discrimination. Figma does not tolerate and prohibits harassment or discrimination on the basis of any protected characteristic. Every Figma has the right to a workplace that is free from discrimination, harassment, and the fear of retaliation.

As a federal contractor, Figma complies with federal law in providing opportunities for equal opportunity. If you are an employee in the United States, or a candidate applying for employment in the United States, you will be asked to voluntarily self identify your gender, race / ethnicity, disability, and veteran status to enable Figma to analyze its efforts to provide equal employment opportunities for all at Figma, in accordance with applicable laws and regulations.

For additional information about Figma's policies on this topic see Figma's Anti-Harassment and Discrimination Policy and Equal Opportunity Employer Statement.

Safe Working Conditions

Figma provides a work environment that is committed to the health and safety of its people and visitors to its offices. We take care to have precautions needed to avoid accidents and dangers to health in the workplace, and maintain policies designed to comply with applicable health and safety laws to provide a safe and healthy working environment.

For example, you are expected to practice safe driving when working for Figma or operating a Figma vehicle. Don't send text messages or use your phone while driving when performing work for Figma or when using any vehicle paid for by Figma.

Figma does not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying, or harassment. You cannot be a part of a criminal organization, corporate extortionist, or other group conducting criminal activities.

See Figma's Safe & Productive Workplace Policy and Workplace Violence Prevention Plan for more information.

Lawful Employment

Figma validates and reviews all relevant documentation to ensure that each employee has the legal right to work in the jurisdiction in which they are employed. Figma provides wages, benefits and overtime pay that comply with all local wage and hour laws and regulations including those relating to minimum wages, overtime hours, and other elements of compensation, including benefits. In addition, Figma pays its employees a living wage, which is higher than the legal minimum wage requirement and takes into account relevant market data.

Figma recognizes and respects the right of its people to freely join or refrain from joining trade unions or workers' organizations of their choosing, appoint workers' representatives, and enter into collective bargaining as permitted by law.

Hiring Former Government Employees. Please note that there are restrictions under United States federal law regarding approaching government employees for job opportunities. This includes restrictions regarding the type of work that former U.S. government employees may do as it relates to their prior agency and job responsibilities. Many states have similar laws. The laws involving the hiring of government employees are complex and can be difficult to navigate. Before you hire or consider approaching a government employee about a potential employment opportunity, reach out to Figma's Legal team.

Protect Figma

Protect Figma's Confidential Information

Figma's confidential information is a valuable asset. This type of information includes product plans, designs, data, prototypes, business strategies, financial information, forecasts, marketing plans, employee information, contact information and customer and supplier lists, as well as the non-public names and addresses of our customers and suppliers, their buying and selling habits and special needs. This information is the property of the Figma and may be protected by patent, trademark, copyright and trade secret laws. All confidential information must be used for Figma purposes only. Everyone must safeguard it. This obligation extends to confidential information of third parties.

Individuals with access to Figma's proprietary information are required to sign an agreement to protect it and keep it confidential. This agreement remains in effect for as long as the individual's relationship with Figma continues, and after ending the relationship as well. Under this agreement, individuals may not disclose Figma's confidential information to anyone or use it to benefit anyone other than the Figma.

A note on press: All inquiries or calls from the press should be referred to the communications team. Only designated Figma representatives may communicate with the press on behalf of Figma. For more information on interacting with press and engaging on social media, see Figma's Communications Policy.

Responsible Use of Figma Assets

Protecting Figma's assets is your responsibility. Care should be taken to ensure that assets are not stolen, damaged, lost, misused, loaned to others, sold, donated or otherwise disposed of without the right authorization. Such assets include equipment, funds, and corporate credit cards.

You must care for assigned computers and other equipment and use them responsibly for business purposes. All Figma computers and electronic devices, whether used entirely or partially on Figma premises or with the aid of the Figma's equipment or resources, must remain fully accessible to Figma and, to the extent permitted by law, will remain the sole and exclusive property of Figma (this includes cloud services provided by Figma). To the extent permitted by law, Figma retains the right to access any information received by, transmitted by or stored in any such electronic communication device or cloud repository.

Privacy & Data Protection

Figma is committed to the protection of personal privacy and complies with applicable privacy and data protection laws, including those of the United States and the European Union. Figma uses industry standard processes to secure user data against unauthorized access and use and works

under the principle that any use, sharing, or retention of personal data must be supported by, or based on, consent or a legitimate, business purpose.

For additional information about Figma's policies on these topics, see Figma's Privacy Policy, Information Security and Data Privacy policies and People Privacy Notice.

Play Fair

Meals, Entertainment, and Gifts

Promoting Figma and building good relationships can properly include gifts, meals, entertainment, and travel involving a third party – provided generally that each has a proper business purpose and are not given to improperly influence acts or decisions. All employee gifts, meals, entertainment, and travel must be booked and paid for in compliance with the Meals, Entertainment, and Gifts sections of Figma's Travel and Expense Policy, which is managed by Figma's Procurement team.

Conflicts of Interest

You must avoid situations that create an actual, potential or perceived conflict between your personal interests and the interests of Figma. A "conflict of interest" occurs when a personal interest, or that of another party, such as a competitor, supplier, customer or personal business, interferes in any way—or even appears to interfere—with the interests of Figma as a whole. You are expected to engage with Figma's ethics team, which includes members of the People and Legal teams, with any questions related to these types of situations and to seek advance approval to engage in outside opportunities that may pose a conflict of interest.

For more information, see Figma's Conflict of Interest Policy.

Corporate Opportunities

You are prohibited from taking business opportunities for yourself if Figma may desire to take advantage of them, this includes taking on or diverting opportunities that are discovered as a result of your position with Figma or through the use of Figma's information for your personal gain, unless the opportunity is disclosed to and pre-approved by the Ethics Team (employee-ethics@figma.com). You may not use Figma property, information or your Figma position for improper personal gain, and you may not compete with the company directly or indirectly. You owe a duty to Figma to advance its legitimate business interests when the opportunity to do so arises. These opportunities include, for example, inventing products or services, writing books, and making certain private company investments. For more information, see Figma's Conflict of Interest Policy

Insider Trading

Figma prohibits the use of "inside" or material nonpublic information about Figma, or about companies with which we do business (including our customers and suppliers), in connection with buying or selling securities, including "tipping" others who might make an investment decision on

the basis of this information. It is a violation of this Code and Figma's Insider Trading Policy to tip or to trade on inside information. Individuals who have access to inside information (whether ours or that of another company with which we do business) are not permitted to use or share that information for any purpose except to conduct Figma business.

Accurate Financial Reporting

It is critical that Figma accurately represent all business information. Figma's financial, accounting, and other reports and records must accurately and fairly reflect the transactions and financial condition of Figma in reasonable detail, and in accordance with generally accepted and Figma-approved accounting principles, practices, and procedures, and applicable government statutes and regulations. You shall not participate in actions or the submission of any information that could cause Figma's books, records, or accounts to misrepresent or improperly reflect a corporate transaction or the disposition of corporate assets. For more information regarding compliance on financial reporting and policies on reporting on suspected fraud or improper behavior, see Figma's Compliance Reporting Policy.

We regularly file reports and other documents with regulatory authorities, including the Securities and Exchange Commission ("SEC"). In addition, we may make other public communications, such as press releases, from time to time.

Depending upon your position with Figma, you may be called upon to provide information to help ensure that our public reports and communications are complete, fair, accurate, and understandable. You are expected to use all reasonable efforts to provide complete, accurate, objective, relevant, timely, and understandable answers to inquiries related to our public disclosures. Employees involved in preparing public reports, including sustainability reports, and communications must use all reasonable efforts to comply with our disclosure controls and procedures.

If you believe that any disclosure is materially misleading or if you become aware of any material information that you believe should be disclosed to the public, it is your responsibility to bring this information to the attention of our compliance officer ("Compliance Officer"). If you believe that questionable accounting or auditing conduct or practices have occurred or are occurring, you should follow the procedures set forth in our Compliance Reporting Policy. We have designated our General Counsel (or if no such employee at Figma has that title, or in the absence of the General Counsel, the most senior-in house attorney of Figma) or his or her designee as the "Compliance Officer".

SEC Reporting and Financial Statement Preparation

Our periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws, and SEC rules. If you contribute in any way to the preparation or verification of our financial statements and other financial information, you must ensure that our books, records, and accounts are accurately maintained. You must also cooperate fully with our accounting department, as well as our independent public accountants and counsel. If you are involved in the preparation of our SEC reports or financial statements, you must:

Be familiar with and comply with our disclosure controls and procedures and our internal control over financial reporting.

Take all necessary steps to ensure that all filings with the SEC and all other public communications about our financial and business condition provide full, fair, accurate, timely, and understandable disclosure.

Quarterly Compliance Certifications

Depending on your position here at Figma, we may ask you to certify your knowledge of various facts each quarter. We rely on certifications to record transactions, make legal and accounting determinations, and comply with laws. If you do not provide a certification or complete a certification completely, honestly and accurately, you may be in violation of this Code. This will result in disciplinary action up to and including termination of your service with Figma.

Loans

Under SEC rules, we are not allowed to provide loans (or guarantee loans) to our executive officers and directors or their family members. The Compensation Committee of the Board of Directors must approve any Company loan to any other service provider.

Sales Integrity & Fair Competition

We strive to compete vigorously and to gain advantages over our competitors through better performance, not through unethical or illegal business practices. Gathering information about our competitors, often called business intelligence, is a legitimate business practice. You may not, through improper means, get proprietary information (like trade secrets) or business intelligence from others, or induce disclosure of confidential information from employees of other companies. You must not steal or unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of others, including that of business partners and customers. These rules also apply to consultants, vendors and other partners we retain. If you have obtained this type of information by mistake, consult your manager or the Figma Legal team. You are expected to deal fairly and honestly with our customers, suppliers, employees and anyone else you have contact with as a Figma employee. Don't make false or misleading statements about our competitors - it's inconsistent with our reputation for integrity and harmful to our business.

- You should be sensitive to situations where they may have access to proprietary or confidential information during the procurement process. Any individual who receives such information (including, for example, by misdirected email) should not distribute such information and must immediately report the issue to Figma's Legal team.
- You may not solicit, accept, or use information that was disclosed in breach of an obligation of confidentiality. You may also not ask anyone else to violate a duty of confidentiality.
- During the sales process, keep confidential or proprietary information of potential customers or information we receive about others in that process confidential. Confidential

information can include proposed prices, technical evaluation plans, evaluations of proposals, competitive range determinations, rankings of proposals, source selection information (in the case of government contracting), or other information. Figma's policy is to avoid even the appearance of impropriety during the while going through the procurement process of any potential customer.

Figma complies with applicable competition laws, including the standards of fair business, fair advertising and fair competition. Figma will not propose or enter into any agreement with any competitor to fix prices, margins, terms and conditions, or to divide up any markets or customers.

Organizational Conflicts of Interest. In the context of sales to the U.S. government, Figma strives to comply with government procurement regulations that restrict businesses from participating in a procurement or activity where there is an organizational conflict of interest ("OCI") absent an acceptable mitigation plan. An OCI may arise when Figma does work: (i) that may give it an unfair competitive advantage for future opportunities; (ii) that may put Figma in a position where it is evaluating itself, or (iii) that allows Figma to set the standards for an opportunity that it later may seek. If you come across a situation that you suspect may give rise to an OCI, consult Figma's Legal team immediately.

Geographic restrictions in government contracting. Certain laws and regulations may require us to supply products and services from select, approved countries or to disclose the country of origin for its products. Figma is committed to complying with all applicable domestic preference and supply chain requirements, laws, and regulations in its government contracting process.

Follow the Rules

Our success depends upon each individual operating within legal guidelines and cooperating with authorities. You must always obey the law while performing your duties to Figma. You are expected to comply with all applicable laws wherever you travel on Figma business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. We also expect you to comply with U.S. laws, rules and regulations governing the conduct of business by U.S. citizens and corporations outside the United States.

If you have a question in the area of legal compliance or as to whether an activity is restricted or prohibited, please contact Figma's Legal team immediately.

Anti-Corruption Laws

Figma is committed to maintaining the highest standards of business conduct and ethics everywhere we operate or do business. This means that we all must comply with all applicable anti-bribery laws in all of our interactions with customers, partners, employees, consultants, or anyone else we interact with on behalf of Figma anywhere in the world to support a business free from corruption, extortion, bribery and similar unlawful, unethical, or fraudulent activity. You are prohibited from offering, giving, promising, or authorizing any bribe, gift, loan, fee, reward, or give other advantage to any government official or employee, any customer, or any other person to obtain any business or to improperly influence any action or decision. Figma is also committed to

doing our best to ensure the business practices of our business partners meet the same ethical standards. Bribery can have very serious consequences for the individuals involved and for Figma. If you have any questions about the application of anti-corruption laws or any related issues, immediately seek advice from Figma's Legal team.

For additional information about Figma's policies on this topic, see Figma's Anti-Bribery and Corruption Policy.

Sanctions and Export Control Compliance

As a company with headquarters in the United States, Figma must comply with U.S. sanctions and export control regulations. These regulations control where Figma may share or ship its technology and information and who we do business with. We need to be aware of:

- economic sanctions that prevent us from doing business with certain countries, entities, or individuals, and
- export controls that apply to products, information, and technical data that we may transmit from country to country.

You are expected to learn and understand the extent to which these regulations apply to Figma's transactions. For additional information, see our U.S. Sanctions and Export Control Compliance Policy. Reach out to Legal for assistance, especially when dealing in new markets or with prospective government officials and agencies.

Controlled unclassified information. As a government contractor, Figma may receive controlled unclassified information ("CUI"), which is information that the government creates or possesses, or that an entity creates or possesses for or on behalf of the government, that must be handled using safeguarding or dissemination controls. There are several categories of CUI, including export controlled, defense, and privacy information. CUI will be marked, identifying it as CUI and listing the specific category or subcategory of CUI as well as any safeguarding or dissemination controls. Because the misuse of CUI can result in sanctions, it is important to comply with any identified controls. If you receive CUI or expect to receive CUI, contact Figma Legal for compliance guidance.

Money Laundering and Third Party Payments

Figma is committed to complying with all anti-money laundering and antiterrorism laws throughout the world.

What's money laundering? Money laundering occurs when individuals or organizations try to conceal illicit funds or make these funds look legitimate. Anyone requesting payments to vendors, or potential vendors, as well as those monitoring payments to Figma, must flag suspicious activity. The following examples may be indications of potential money laundering:

- Attempts to make large cash payments
- Payments by or to someone who is not a party to the contract
- Requests to pay more than provided for in the contract
- Payments made in currencies other than those specified in the contract
- Payments from an unusual, non-business account

For more information, please review Figma's [Anti-Money Laundering Policy](#).

Corporate Social Responsibility

Environmental Standards

Figma is conscious of its impact on the environment and aspires to minimize its negative impacts to preserve our natural resources for future generations. You must comply with all applicable environmental laws, regulations, and standards relating to our business and our impact on the environment.

Figma aspires to reduce its negative environmental impact through the use of environmentally friendly technologies and practices and aims to prevent environmental damage. Figmates are encouraged to look for ways to gradually improve Figma's carbon footprint by saving energy and resources, promoting recycling, and using renewable sources where possible. Figma aims to ensure that all chemicals and other materials used in its business that pose a danger when they are released into the environment are identified, managed, and disposed of in a safe and responsible manner, in accordance with applicable laws and regulations.

These principles are integral to any decisions in Figma's own business and also play an important role in Figma's procurement strategy and the selection of Figma's suppliers.

Human Trafficking

Figma respects internationally recognized human rights (as expressed in the Universal Declaration of Human Rights) and the principles concerning fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Figma has zero tolerance for slavery, human trafficking, and child labor. Our employees voluntarily agree to the terms and conditions of their employment without coercion, and can freely terminate their employment either immediately without notice, or on reasonable notice.

Figma employees are prohibited from engaging in or supporting any trafficking in persons, use or procurement of commercial sex acts, or use of forced or child labor. Figmates must immediately report any violation or suspected violation of this policy to Figma's Legal team. Any employee found to be in violation of this policy is subject to disciplinary action, including termination of employment.

For additional information about Figma's policies on this topic see Figma's Modern Slavery Act Statement and Figma's Anti-Slavery and Human Trafficking Policy.

The Fine Print

Our Board of Directors has established this Code and, directly or through its Audit Committee, if permitted under the rules of the securities exchange on which our securities are listed, oversees its compliance. The Board has delegated day-to-day responsibility for administering and interpreting the Code to the Compliance Officer.

It is rare for anyone to be exempted from any part of the Code, regardless of seniority or position. Any waiver of any provision of the Code for a director, executive officer, or senior financial officer must be approved by our Board of Directors or its Audit Committee, and promptly disclosed as required by applicable law and stock exchange rules. Waivers of the Code for other employees or contractors must be approved by the Compliance Officer, the Board, or the Audit Committee.

Nothing in this Code is intended to alter existing legal rights and obligations of Figma or any of its employees, officers, directors, or non-employee contingent workers, including "at-will" employment arrangements or the terms of any agreement Figma may have with you.