A Message from the Special Committee: Recommendations to Enhance Pinterest’s Workplace Culture

For the past five months, the Special Committee has taken a close look at Pinterest's workplace culture. Today, we are sharing our recommendations to ensure that Pinterest is the inclusive, fair, and respectful workplace that we -- and you -- want it to be. Our recommendations are rooted in our extensive review and assessment of the Company's culture, including the experiences and observations you shared, and we thank you for participating in this important process. Although this stage of our review is coming to a close, the work is just beginning. The Board of Directors has unanimously adopted our recommendations, and we are fully invested in their implementation.

How We Got Here

On June 29, 2020, in response to concerns raised by current and former employees, Pinterest announced that a Special Committee of the Board of Directors had been established to review Pinterest's workplace culture. The Board initially appointed four independent directors -- Michelle Wilson, Leslie Kilgore, Jeremy Levine, Fred Reynolds -- and, in August, added new independent director Andrea Wishom to serve on the Special Committee. We engaged the law firm Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”), which has extensive experience investigating workplace culture issues, and asked Danielle Conley, the co-chair of WilmerHale’s Anti-Discrimination Practice and former Associate Deputy Attorney General at the U.S. Department of Justice, to lead the WilmerHale team.

We directed WilmerHale to conduct an independent, top-to-bottom review of Pinterest's workplace culture. The review included a detailed assessment of how Pinterest fosters a diverse, equitable, and inclusive community; supports its employees; levels, compensates, evaluates, and promotes employees; investigates and responds to employee allegations of discrimination, harassment, retaliation, and other workplace issues; and trains employees to promote a healthy workplace culture. We made sure the WilmerHale team had unfettered access to everything it needed, from Pinterest’s policies to its practices to its people. With our support, WilmerHale retained fair employment practices experts at DCI Consulting Group, Inc. (“DCI”) and diversity, equity, and inclusion expert Dr. Arin Reeves of Nextions.

Our Review and Next Steps

WilmerHale spoke with over 350 current and former employees from a wide range of offices, orgs, levels, and backgrounds, including more than 260 current full-time employees. We are thankful for your commitment to making Pinterest better and for your willingness to talk openly with WilmerHale about your experiences, criticisms, and suggestions for improvements. We know most of you agreed to share your thoughts on the condition of anonymity, and we thank you for trusting us and trusting our review.
WilmerHale, DCI, and Dr. Reeves conducted 1:1 interviews and numerous focus groups with Pinterest leaders and key process owners, including the Executive Leadership Team, the I&D Team, Recruiting, the Compensation Team, HRBPs, the People Experience Team, the Learning and Development Team, hiring managers, the Legal Team, investigators, and others. WilmerHale and its experts also reviewed thousands of documents to understand the framework for employees’ experiences, including Pinterest’s policies and procedures relevant to workplace behavior and culture; trainings for senior leaders, managers, and individual contributors on discrimination, harassment, retaliation, and unconscious bias; protocols governing investigations, including reporting channels, investigation procedures, and guidance on disciplinary actions and remediation; files related to discrimination, harassment, and retaliation investigations; wiki pages and employee guidance documents regarding investigations and support from the People Team; Q&A materials; Pulse Survey results; Pinterest’s inclusion and diversity plans and initiatives; employee data, policies, and procedures related to compensation, leveling, performance evaluations, and promotions; exit surveys and related memos; and Board materials and presentations related to workplace culture.

Our recommendations are informed by information many of you provided. Through this review, we’ve heard that you believe Pinterest can -- and must -- do better if it is to be the respectful, inclusive, and diverse company we collectively want and expect. We’ve heard that you believe Pinterest needs to provide you with stronger support and more transparency around its systems and processes -- from the way that employees are leveled and compensated, to how decisions regarding promotions are made, to how employees’ complaints are investigated and resolved. And we’ve heard that Pinterest’s processes must be more consistent for everyone to have confidence that decisions are fair and equitable.

The Special Committee met with WilmerHale, sometimes with DCI and Dr. Reeves, nearly every week throughout the review, and we were actively engaged in scoping the review and evaluating the information we received. The recommendations below are an important milestone. We have communicated our recommendations to Pinterest’s key leaders and the full Board -- and they have accepted the recommendations with enthusiasm. The full Board unanimously adopted the recommendations on November 25, 2020.

But our work is not done. We believe strongly that for the recommendations to make a meaningful, positive difference, they must be implemented thoughtfully, sensitively, and without delay.

**Our Recommendations**

We are committed to ensuring that Pinterest is a respectful and inclusive organization -- a company where every employee can be proud to work. Our recommendations focus on making Pinterest’s workplace culture more **transparent**, providing more **care and support** to employees,
promoting more consistency in processes and decision-making, and holding the entire organization -- starting with its leaders -- accountable.

For each high-level recommendation listed below, we have adopted a series of specific, concrete recommendations designed to strengthen Pinterest’s workplace culture. Some recommendations create new ways for Pinterest to support you and promote a culture that is fair, respectful, and inclusive; other recommendations focus on strengthening structures that Pinterest already has in place. Among what’s new: mandating unconscious bias training for every employee, including all managers and senior leaders; recognizing and rewarding your efforts to promote inclusion and diversity; standing up an Ombuds Office as a confidential resource to provide guidance on how to navigate tough situations; creating clear role expectations to guide leveling, performance management, and promotion reviews and decisions; creating a centralized team to investigate workplace concerns; and redefining the Compensation Committee of the Board of Directors as the Talent Development and Compensation Committee, which will review Pinterest’s efforts to attract, develop, and retain a diverse and talented workforce. We’re also recommending that Pinterest invest more in the teams that support you, including the Inclusion & Diversity Team and the People Team; further standardize and increase transparency around leveling, compensating, evaluating, and promoting employees; enhance its policies; and enhance the training for Pinterest’s leaders, managers, the People Team, investigators, and all employees. And, in recognition of the critical work ahead, we recommend Pinterest form an Implementation Team, reporting to the Chief Executive Officer, to ensure these recommendations are thoughtfully and effectively implemented.
I. **Focus on the Foundation**

The foundation for a strong workplace culture starts at the top. To strengthen Pinterest’s workplace culture, Pinterest’s leaders must first create a vision for what Pinterest *should* be. That vision will guide the implementation of our recommendations in a way that reflects and promotes the Company’s values. The Chief Executive Officer should lead the charge to create the vision and implement these recommendations.

A. **Define the Vision.** Pinterest’s Executive Leadership Team, as soon as practicable, should convene a summit, facilitated by a third-party expert, to define the vision for the Company -- including its aspirations for diversity, equity, and inclusion (“DEI”) and how it will support employees -- and ensure Pinterest’s values align with the vision. Following the summit, Pinterest leadership should submit this vision to the Board of Directors (the “Board”) for approval. Following its approval, Pinterest leadership should communicate the vision to all Pinterest employees, so that they understand how they fit into the vision and how this vision, together with Pinterest’s values, forms the foundation of its workplace culture.

B. **Form an Implementation Team.** Effective and efficient implementation of our recommendations is critical to strengthening Pinterest’s workplace culture. Pinterest should assemble a cross-functional team (the “Implementation Team”) to ensure that policy and process owners have the guidance, resources, and support necessary for implementation and to drive progress. The Implementation Team should include stakeholders with diverse backgrounds and viewpoints from across the various functions that are key to implementing these recommendations. The Implementation Team should report directly to Pinterest’s Chief Executive Officer.

II. **Champion Diversity, Equity, and Inclusion**

Pinterest should be a place where every employee feels heard, valued, and part of the larger community. To accomplish this goal, Pinterest should invest in, empower, and support the Inclusion & Diversity (“I&D”) Team. Pinterest should emphasize DEI in its efforts both to recruit and retain employees and to develop a strong, cohesive workplace culture. And Pinterest should infuse its commitment to DEI into its policies and practices, to the extent practicable.

A. **Build the DEI Vision.** Just as everyone at Pinterest should understand the Company’s core values and vision and how they fit into that vision, employees need to understand Pinterest’s DEI goals and how Pinterest intends to achieve them. As part of the summit mentioned above, members of Pinterest’s Executive Leadership Team and other key leaders identified in collaboration with the I&D Team should develop a clear DEI vision statement. This statement, which could build upon the I&D plans developed by individual orgs, will drive Pinterest’s longer-term strategic planning to foster DEI. The Executive Leadership
Team should present this vision to the Board (or a committee of the Board) for review and approval. Once adopted, the DEI vision should be shared broadly across the Company and serve as the foundation for I&D strategic plans and initiatives.

B. **Invest in and Empower the I&D Team.** Pinterest should ensure the I&D Team has the guidance, resources, and influence it needs to effectively lead the Company’s DEI planning and initiatives. We recommend that Pinterest commit to the following steps so that the I&D Team can drive concerted efforts and manage initiatives that have lasting impact:

1. **Develop a strategic DEI plan.** After developing a clear DEI vision statement, the Executive Leadership Team should undertake strategic planning with the I&D Team to establish action items and objectives to execute the agreed-upon vision. The I&D plans developed by individual orgs are an important first step. The I&D Team should be empowered to develop a unified strategic plan, informed by org-specific plans, to guide the Company in prioritizing key DEI goals and promote consistency and coordination across the Company.

2. **Invest greater resources in the I&D Team.** Pinterest should provide the I&D Team the resources it needs to meet its expanded mandate.

3. **Empower the I&D Team.** To help execute on Pinterest's vision, the I&D Team needs to be “in the room.” The I&D Team should be involved in all DEI initiatives at Pinterest so that its expertise, resources, and experience can be used to operationalize these efforts and ensure that these efforts are driving toward the larger DEI vision and goals.

C. **Educate Employees on Inclusivity and Unconscious Bias.** Pinterest’s commitment to inclusivity should inform its training.

1. **Train everyone on unconscious bias.** Pinterest should require that every employee complete unconscious bias training to aid in identifying potential bias and appreciating where and how bias may potentially affect interactions and decisions. We understand that Pinterest currently provides such training to all new hires. This training should be mandatory for all employees, including managers and Senior Leaders (the Executive Leadership Team, all “Heads,” and all employees at L8 or higher).

2. **Expand the inclusivity curriculum.** Building on the initial unconscious bias training, Pinterest should design follow-up courses focusing on inclusivity and unconscious bias.
D. **Be More Transparent About DEI Efforts.** Pinterest should provide greater transparency with respect to DEI initiatives and Pinterest’s progress towards its goals. To that end, we recommend that Pinterest:

1. **Present annually on DEI at Pinterest.** Pinterest’s I&D Team should lead an annual All Hands presentation to share updates and provide an open forum for Q&A.

2. **Publish more on DEI initiatives and progress.** Pinterest should formalize and expand its annual blog post focused on DEI efforts into a comprehensive diversity report, which we recommend publishing twice a year for at least two years and at least annually thereafter.

E. **Listen and Learn from Employees.** Pinterest’s DEI initiatives should be attuned to employees’ experiences and needs. That process starts with hearing and understanding employee concerns. We recommend that Pinterest create and enhance ways for leaders to hear from employees about DEI issues and observations.

1. **Expand the Pulse Survey.** Pinterest should add more questions to the Pulse Survey designed to assess how employees feel about DEI-related topics. For example, the Pulse Survey should consider asking employees whether their managers promote inclusion on their teams, in meetings, and more broadly. We are aware that Pinterest recently added DEI-focused questions to the now-quarterly Pulse Survey, and we support those changes.

2. **Hold regular listening sessions.** Creating opportunities for regular dialogue between Senior Leaders and other employees at Pinterest is instrumental to creating a more inclusive and respectful workplace culture. We understand that Pinterest has recently held DEI-focused listening sessions and Q&A sessions. Going forward, the I&D Team should facilitate regular (at least quarterly) listening sessions, ideally of varying sizes and formats depending on what proves most effective.

F. **Strengthen Pinterest’s Employee Communities.** Pinterest’s employee resource groups (“Communities”) serve as a helpful resource for the I&D Team and an important avenue for fostering inclusion. We recommend that Pinterest support and strengthen these Communities in the following ways:

1. **Define sponsorship expectations.** Each Pinterest Community has an executive sponsor who dedicates time to advocate for, guide, and mentor that Community. For these relationships to be meaningful and effective, Pinterest should establish
clear expectations for sponsors, educate sponsors on those expectations, and train sponsors to engage effectively with their Communities.

2. **Broaden involvement in Communities.** Pinterest should consider instituting term limits and elections to avoid burnout among Community leaders and to encourage involvement from more employees.

3. **Recalibrate the Communities.** We know that there are employees who are not part of traditionally underrepresented populations in tech who would still benefit from a greater sense of community and support. Pinterest should make clear that its Communities are inclusion- and diversity-driven support networks and that other employee support groups may be formed under the Learning and Development Team. This will help each group get the resources and support it needs to flourish at Pinterest.

G. **Prioritize DEI in Recruiting.** Pinterest should embed its DEI goals in how it designs and executes its recruiting and hiring initiatives.

1. **Diversify hiring panels.** To the extent practicable, Pinterest should include diverse employees in the panels that interview job candidates, while not overburdening diverse employees. Having diverse employees conduct interviews helps ensure that a variety of perspectives are considered in evaluating candidates and reduces the potential impact of unconscious bias.

2. **Expand the pipeline.** Pinterest should expand its efforts to identify diverse candidate sources, including by developing and investing in partnerships with Historically Black Colleges and Universities and Hispanic-Serving Institutions, engaging headhunters to help identify and recruit diverse talent, increasing efforts to recruit lateral hires from a wider range of organizations, and recruiting from a broader range of schools.

H. **Recognize and Reward DEI Efforts.** Pinterest should review and update, as appropriate, its core competencies, which are intended to guide evaluation and promotion decisions, to reflect Pinterest’s commitment to DEI. Pinterest should also consider expanding its STARS (“Special Thanks And Recognition”) spot bonus program to reward employees for significant efforts to promote DEI. These enhancements will further Pinterest’s efforts to reward and hold employees accountable for furthering DEI initiatives.

I. **Emphasize DEI with Partners and Pinners.** After Pinterest has taken steps to enhance its internal DEI initiatives, it should consider how to promote DEI within Pinterest’s broader community.
1. **Prioritize partners committed to DEI.** Pinterest should consider prioritizing partnerships with vendors and other third parties that share Pinterest’s commitment to DEI by, for example, incorporating requests for vendors’ DEI-related information and policies as part of the vendor selection process.

2. **Develop DEI protocols for customer relations.** Pinterest should consider establishing protocols for involving members of the I&D Team, as appropriate, when customer concerns arise that touch on DEI-related issues.

### III. Prioritize People

Pinterest's most valuable resource is its people. Elevating the function that supports employees is key to fostering a respectful and inclusive workplace, and it starts with leadership’s buy-in. Leadership must embrace and promote our recommendations to strengthen the People Team and, more broadly, the important work done by the People Team to support employees. Our recommendations below focus on giving employees the guidance and support they need to face any challenge at work, big or small.

#### A. Enhance and Invest in the People Team.**

It is critical that Pinterest employees have trust and confidence in the stewardship of the People Team. Pinterest should enhance the human resources function by, among other things, ensuring that the People Team is well-resourced and staffed appropriately. Pinterest should engage an organizational development consultant to help the People Team assess its existing resources and capabilities and provide recommendations to the Chief Executive Officer regarding potential additions.

#### B. Provide Every Person with a Person.**

It is essential that Pinterest provide meaningful and dedicated support to its employees. This should include adopting a structure that provides each employee with a designated People Team contact who can offer guidance, discuss workplace challenges, and connect employees with other resources.

#### C. Train the People Team.**

To support employees effectively, the People Team must understand Pinterest’s processes and be able to advise employees about them.

1. **Educate on the investigations process.** Pinterest should educate all members of the People Team, including those who do not conduct workplace investigations, on how the investigations process works, what resources are available to employees during and after investigations, and how the People Team can support employees during the investigations process.

2. **Educate on Total Rewards processes.** Similarly, Pinterest should educate all members of the People Team on the Company’s Total Rewards processes — specifically, how Pinterest levels, compensates, evaluates, and promotes employees. These trainings should explain the philosophy behind the processes; explain the
criteria that should be relied upon for making leveling, pay, performance evaluation, and promotions decisions; and emphasize the importance of consistency in making these decisions.

D. **Outsource the Pulse Survey.** To further encourage candid feedback from employees about their experiences, the Company should hire an independent third party to conduct the Pulse Survey.

E. **Create an Ombuds Office.** We recognize that some employees may be more comfortable having someone outside the People Team listen and help determine the best avenue to resolve their concerns. Pinterest should pilot (for two years) an independent Ombuds Office that is not a part of the People Team. The Ombuds Office will, among other things: confidentially counsel employees who have concerns but are uncertain whether to file a formal complaint; provide guidance about Pinterest’s policies and investigatory processes as well as the resources to support employees participating in an investigation; and escalate systemic issues and concerns.

F. **Clarify Roles of the People Team and the Ombuds Office.** Pinterest should revise its employee-facing guidance to clarify the roles played and services provided by the various groups within the People Team (including HR Business Partners and People Experience Partners), as well as to inform employees about the Ombuds Office.

IV. **Build Trust and Transparency in Decisions that Impact Pay and Promotions**

Promoting consistency and transparency in how Pinterest levels, compensates, evaluates, and promotes employees (the “Total Rewards” processes) is key to building trust in decisions that impact career development and compensation. Pinterest should ensure that its Total Rewards processes are consistently applied and clearly communicated.

A. **Establish a Vision for Total Rewards.** Pinterest’s Total Rewards processes should be anchored in a comprehensive and strategic vision. To set the vision, Pinterest’s Executive Leadership Team, with the help of a third-party organizational development expert and Pinterest’s key process owners for Total Rewards, should focus on the underlying goal and philosophy behind each process, what policies exist for each process, and how each process furthers the desired end goal. The Executive Leadership Team should present this vision to the Board (or a committee of the Board) for review and approval. Pinterest should review, and update as appropriate, the core competencies in its competency model, consistent with its values and Total Rewards vision.

B. **Update and Integrate Role Expectations into Hiring and Total Rewards.** The knowledge, skills, abilities, and other characteristics required for each job establish the framework for fair and consistent hiring, leveling, performance management, and promotion processes. Pinterest should take the steps described below to integrate consistently its
competency model and role expectations into its hiring and Total Rewards processes. We understand that Pinterest has recently developed a number of enhancements to its processes consistent with our recommendations.

1. **Build out role expectations.** Pinterest should gather up-to-date information about the knowledge, skills, abilities, and other characteristics needed to perform each role and use this information to develop clear guidelines (the “role expectations”) for each unique role at the Company. The role expectations should be used to guide job leveling decisions, performance management, and promotion reviews and decisions.

2. **Broaden the promotions pool.** In addition to having managers nominate employees, Pinterest should establish criteria (e.g., performance at or above a certain level) for employees to be considered for promotion.

3. **Update and refine the leveling frameworks.** As Pinterest grows and changes, role expectations -- and potentially core competencies -- are also likely to change. The Company should review and update, as appropriate, its frameworks for hiring, leveling, performance evaluation, and promotion, and document any changes over time (including the rationale and/or research supporting those changes).

**C. Educate and Support Employees on Total Rewards Processes.** Employees need to understand Pinterest’s Total Rewards philosophies, practices, and criteria. In addition to training key stakeholders, Pinterest should tell its employees what it expects and how to succeed.

1. **Communicate Total Rewards philosophies and practices to everyone.** Pinterest should continue and expand its efforts to explain its philosophies, practices, and criteria around leveling, performance management, compensation, and promotions.

2. **Train recruiters on the impact of initial leveling and compensation.** Pinterest should educate recruiters on the impact that initial leveling and compensation decisions have on career and compensation trajectories. Pinterest should also train recruiters on how to determine a potential new hire’s compensation package and level, including potential level adjustments after a position is posted.

3. **Provide information on levels, role expectations, and career opportunities.** We understand that Pinterest has recently begun to include the level in a job offer letter; this helps increase transparency and establish clearer expectations. Pinterest should also tell new hires the salary ranges, role expectations, and potential career opportunities associated with the role.
4. **Establish and communicate guidelines for internal transfers.** To promote greater transparency and fairness, Pinterest should establish and communicate guidelines for posting internal openings.

5. **Develop expectations of managers for performance management and career development.** Managers should use a consistent approach for performance management and career development of employees on their teams. Pinterest should establish a formal process for setting performance goals and for providing detailed and actionable feedback in real time, in addition to the formal performance review cycles and promotion process.

6. **Explain promotion requirements.** Pinterest should explain how role expectations are intended to guide career development, which would provide more transparency to employees on their promotion readiness. Pinterest should also specify and explain other considerations in making promotion decisions, including factors outside an employee's (or manager's) control (e.g., budget, business need).

7. **Communicate ways to report concerns.** Pinterest should tell employees where they can report concerns related to level, pay, performance ratings, or promotion, and how and by whom those concerns will be addressed.

**D. Strengthen Checks and Balances on Total Rewards Processes.** Pinterest should continue to enhance its checks and balances on the application of Total Rewards policies and practices. Pinterest should review Total Rewards decisions to assess whether they align with the updated, structured decision-making process. Pinterest should also assess the circumstances for exceptions or adjustments. Managers should be evaluated and held accountable for their success in providing regular and meaningful feedback guided by role expectations.

**E. Focus on Data and Document Management.** Pinterest should enhance its practices for documenting, storing, and managing information relating to the hiring and Total Rewards processes.

**V. Set Clear Expectations**

Pinterest employees need to know what is expected of them and what to expect of each other. This starts with Pinterest's policies, which set the ground rules for a safe, respectful, and inclusive workplace culture and for holding everyone accountable for abiding by those rules.

**A. Strengthen Pinterest’s “Harassment and Discrimination Policy.”** Pinterest's Harassment and Discrimination Policy (the “Policy”) is the foundational document for the Company's commitment to providing a strong workplace culture. Pinterest should revise the Policy to make clear that the commitment goes beyond preventing and addressing
conduct that is unlawful. And the Company should rename the Policy to reflect this broader purpose (e.g., the “Respect in the Workplace Policy”). Relatedly, Pinterest should:

1. **Identify additional prohibited misconduct.** Pinterest should not tolerate unprofessional or inappropriate conduct, even if it does not rise to the level of unlawful harassment or discrimination. Pinterest should revise the Policy to emphasize its prohibition on conduct that contravenes its values or vision for its workplace culture (e.g., conduct that is intended to cause personal humiliation or embarrassment; conduct that is threatening, intimidating, or coercive; directing vulgar or profane language at others; and inappropriately publishing or disclosing employees’ private information).

2. **Expand discussion of discrimination and retaliation.** Pinterest should add language defining discrimination and give examples of how discrimination can manifest, including in promotion decisions, job assignments, compensation, and other decisions that affect the terms and conditions of employment. Pinterest should also define retaliation in the Policy and give examples, including any conduct that would have a chilling effect on reporting employee concerns.

3. **Spotlight expectations for managers.** Pinterest should revise the Policy to set forth managers’ obligations to uphold and promote a strong culture. The Policy should articulate the expectation that managers conduct themselves in a professional manner that models Pinterest’s values and promotes a safe, respectful, and inclusive workplace culture. The Policy should also provide specific examples of managerial conduct that it will not tolerate, including ignoring others’ misconduct or discouraging, directly or indirectly, individuals from reporting or escalating workplace concerns.

4. **Address off-site conduct.** Pinterest should clarify that the Policy applies to any conduct that may impact working relationships and the broader working environment, regardless of where it occurs (including on social media).

**B. Establish Additional Rules and Guidance to Promote a Safe, Respectful, and Inclusive Community.** Beyond the Policy, we recommend that Pinterest provide enhanced guidance and rules around (1) drugs and alcohol and (2) workplace relationships to further safeguard the culture that Pinterest strives to create.

1. **Adopt a drugs and alcohol policy.** Pinterest should adopt a drugs and alcohol policy that, among other things: highlights the importance of creating a safe and respectful working environment; expresses that impairment is not an excuse for misconduct; explains that if employees choose to drink at a work-related event, they
are at all times expected to exercise sound judgment and act responsibly; highlights that managers are expected to model appropriate behaviors for other employees and make events welcoming to employees who choose not to drink; and identifies resources available to employees who may be suffering from addiction or other substance-related issues.

2. **Adopt a standalone workplace relationships policy.** Pinterest should incorporate general guidance from its FAQs on Pinterest’s Conflict of Interest Policy into a standalone workplace relationships policy that defines romantic and familial relationships that are prohibited within Pinterest’s workforce (including any romantic or familial relationship where a Pinterest employee exercises supervisory or other authority over another Pinterest employee or contractor), establishes disclosure requirements and procedures, and explains the rationale for the policy.

**VI. Give Employees the Tools They Need to Succeed**

Training employees -- at all levels -- on the skills, values, and behaviors that they need to be successful is crucial to building and maintaining a strong workplace culture. Pinterest should train its employees -- from Senior Leaders, to managers and process owners, to employees more broadly -- on the Company’s values and culture, as well as the processes designed to promote those values and strengthen the culture.

A. **Train and Develop Leadership.** Training Pinterest leadership on how to embrace and promote an inclusive and respectful workplace is critical to setting the tone at the top.

1. **Lead by example.** The importance of being an effective, supportive manager and an exemplary Pinterest employee increases with greater responsibility and authority. Pinterest should ensure that all Senior Leaders participate in all values-based or management-focused training that is required of other managers.

2. **Coach the Executive Leadership Team.** Those charged with leading Pinterest and supporting employees need the tools to do so. Pinterest should adopt an executive coaching program for Pinterest’s Executive Leadership Team that combines both individualized coaching and facilitated group coaching. This executive coaching should focus on how to promote a respectful and inclusive workplace, including strategies for making employees feel heard and valued, encouraging efficient and inclusive decision-making, and leading by example on DEI initiatives. The program should be facilitated by a third-party expert.

B. **Train and Develop Managers.** Pinterest should give managers the tools and information they need to succeed and to promote a safe, respectful, and inclusive workplace. We recommend that Pinterest strengthen and prioritize its training for managers to promote a more uniform understanding of Pinterest’s values and processes and empower managers to
support and counsel employees more effectively.

1. **Revamp Pinterest’s anti-harassment and anti-discrimination training.**
   Pinterest should expand and customize its mandatory anti-harassment and anti-discrimination training for managers to focus on best practices and Pinterest-specific expectations of managers, in addition to legal compliance. Consistent with this broader purpose, this training should be rebranded (e.g., “Respect in the Workplace Training for Managers”). There should also be refresher trainings for managers that incorporate advanced content on promoting inclusivity, understanding and mitigating bias, and other best practices in navigating challenging situations, as well as legally required content.

2. **Instruct on Total Rewards.** Because employees often rely on their managers for information about leveling, compensation, evaluations, and promotions -- and managers often play an important role in these processes -- all managers should receive instruction on Pinterest’s Total Rewards processes. This training should explain Pinterest’s competency model and how the model is intended to inform decisions on how employees are leveled, paid, evaluated, and promoted. We support Pinterest’s recent efforts to enhance its managerial training curricula.

C. **Train and Develop All Employees.** Pinterest should ensure that its training for all employees reflects the Company’s values and commitment to building a community that is safe, respectful, and inclusive.

1. **Orient on the vision.** For Pinterest’s community to appreciate, promote, and share Pinterest’s values and vision, Pinterest should ensure that each employee is educated on these core concepts as part of employee orientation.

2. **Broaden the scope.** Pinterest should enhance its mandatory anti-harassment and anti-discrimination training for individual contributors to cover Pinterest’s values and how to promote a workplace that is not only free of harassment, discrimination, and retaliation, but is also safe, respectful, and inclusive.

D. **Prioritize Training.** To increase the utilization of Pinterest’s training programs, Pinterest should require employees to complete a minimum number of hours of annual training on Pinterest values and promoting respect and inclusivity in the workplace. Pinterest should also require managers to take an additional number of hours of training specific to managers, including leadership-based training. Compliance with training requirements should be tracked, with performance penalties for employees who do not fulfill training requirements.

VII. **Investigate with Consistency and Care**
To have a healthy workplace culture, Pinterest must effectively investigate and address workplace concerns, such as discrimination, harassment, retaliation, and related issues. The investigations process needs to be clear, transparent, and consistently applied. Our recommendations are designed to promote a fair process where everyone involved is treated with respect, care, and empathy.

A. **Invest in Investigations.** Pinterest should ensure that its investigators have the resources, training, and other tools necessary to conduct effective investigations of employee concerns and complaints. To that end, Pinterest should hire additional full-time investigators (as the Company is already doing) and ensure all investigators are trained in investigatory best practices, Pinterest’s investigatory procedures, and, as appropriate, trauma-informed investigations.

B. **Create a Centralized Workplace Investigations Team.** To promote consistency in the process and provide a more seamless experience for employees, Pinterest should centralize investigations of employee workplace concerns and complaints, including cases currently handled by Business Conduct and People Experience. Except in special circumstances (for example, where there may be a conflict of interest), all investigations of employee workplace concerns -- from minor disputes to complaints of discrimination, harassment, and retaliation -- should be conducted by members of the same team.

C. **Address Potential Conflicts of Interest.** So that employees have confidence that investigations are fair and free from bias, Pinterest should establish guidelines for circumstances involving actual, potential, or perceived conflicts of interest in which outside counsel or independent investigators should be engaged to conduct an investigation.

D. **Clarify Escalations Process and Protocol.** Certain concerns that are particularly complex, sensitive, or critical to Pinterest’s workplace culture call for a heightened level of attention. To ensure that such matters are identified and handled appropriately, Pinterest should create an escalations team to investigate and/or assess the need for outside counsel or other third parties to investigate certain types of concerns. Pinterest should also revise its escalation protocol to clarify which cases should be promptly escalated and to whom -- such as the General Counsel, Chief Human Resources Officer, members of the Executive Leadership Team, or the Board -- regardless of whether they warrant investigation by outside counsel or an independent investigator.

E. **Increase Care and Transparency.** Being involved in an investigation -- whether as a complainant, reporter, subject, or witness -- can be stressful or unnerving. To help employees know what to expect and the support that is available throughout the process, Pinterest should:

1. **Provide more support.** Pinterest should provide enhanced support, such as emotional support programs and accommodations while an investigation is pending,
for employees involved in investigations (whether as complainants, reporters, subjects, or witnesses).

2. **Tell employees about available resources.** Pinterest should provide more guidance to employees, including in the investigations guide referenced below, on the support available to complainants, reporters, witnesses, and subjects during and after an investigation.

3. **Educate on reporting channels.** It is essential for employees to understand all of their reporting options so that they can choose the option they find most comfortable or appropriate when making a complaint. We support Pinterest’s recent efforts to identify all reporting channels, including anonymous reporting options, on a wiki page. Pinterest should provide additional guidance to employees about the various options and how to use them -- including by indicating the reporting channels that go directly to the investigations team.

4. **Lay out the process.** Pinterest should create a new, employee-facing guide to the investigations process (or augment the existing Business Conduct investigations wiki page). The guide should describe what employees can expect during an investigation; the steps typically taken in connection with an investigation; the standard used to substantiate misconduct; how disciplinary decisions are made and by whom; Pinterest’s prohibition against retaliation; and Pinterest’s expectations for employee cooperation in an investigation, including with respect to requests for relevant documents or information.

F. **Investigate with Care.** It is critical that investigations of workplace concerns are thorough, follow clear and standardized procedures, and are conducted with empathy and care. This includes, for example, promptly responding to employees when they file a complaint, investigating as confidentially as possible, and emphasizing, in communications during an investigation, Pinterest’s prohibition against retaliation.

G. **Ensure Fair and Consistent Disciplinary Decisions.** To enhance employee confidence in investigative outcomes, Pinterest’s processes for making and implementing disciplinary decisions should be thorough and consistently applied. Pinterest should formalize its existing calibrations practice so that investigators are recommending similar outcomes for similar conduct across the Company and, specifically, that its policies and standards apply equally to all members of the Pinterest community, including managers and Senior Leaders. Additionally, Pinterest’s decision-making process should take into account and address circumstances where conduct falls short of the Company’s expectations for employees, even if such conduct does not constitute a policy violation.

H. **Document Investigations Consistently.** Pinterest should consistently document its investigations to help identify potential patterns and provide context for future investigations.
I. **Close the Loop and Follow Up.** To enable employees involved in investigations to move forward, investigators should consistently -- and thoughtfully -- close out investigations and check in with key participants afterwards.

1. **Close-out with care.** Pinterest should have close-out conversations with all complainants, reporters, and subjects. Depending on the circumstances, Pinterest should also inform witnesses whether they should expect to be notified when an investigation concludes. Close-out conversations should be conducted with care and empathy and should include information about the resources available to support employees after investigations.

2. **Follow up with complainants and reporters.** Pinterest should establish a process for following up with complainants and reporters after the close of an investigation to confirm that there are no lingering issues and that the complainant or reporter has not experienced retaliation.

J. **Hear and Address Contractors’ Concerns.** Pinterest is committed to promoting a safe and inclusive workplace for everyone. Although contractors are not Pinterest employees, there should be safeguards to ensure their concerns are heard and addressed appropriately.

1. **Tell contractors about Pinterest reporting channels.** Pinterest should notify contractors that they may report concerns through Pinterest reporting channels. Pinterest should investigate all allegations involving Pinterest employees, including those brought by a Pinterest contractor. Pinterest should timely disclose all concerns raised about a Pinterest contractor to the contractor’s employer.

2. **Establish a protocol for contractor-led investigations.** When a contractor’s employer is conducting an investigation, Pinterest should require that vendor to provide regular updates to Pinterest regarding such investigations.

3. **Hold vendors accountable.** If a vendor fails to conduct adequate investigations or otherwise foster a safe, respectful, and inclusive workplace, Pinterest should address its concerns with the vendor, and if appropriate, discontinue work with such vendor.

VIII. **Support from the Board**

We want to ensure that Pinterest and its leaders demonstrate their commitment to implementing our recommendations and continuing to foster a safe, respectful, and inclusive workplace. Accordingly, we recommend that the Board enhance its procedures in the following ways:

A. **Renew Board Commitment to Supporting a Strong Workplace Culture.** The Board should renew its commitment to fostering an inclusive, equitable, and diverse workplace culture at Pinterest, including by redefining the Compensation Committee as the “Talent
Development and Compensation Committee” (“TDCC”). The TDCC should consider, as appropriate, efforts to attract, develop, and retain a diverse and talented workforce as relevant to the performance assessment and compensation review of the Chief Executive Officer and other members of the Executive Leadership Team. The TDCC should also periodically receive and review reports related to the processes and functions addressed by these recommendations, including reports on DEI efforts, workplace investigations, compliance with Company training requirements, and issues, concerns, and trends noted by the Ombuds Office.

B. **Train the Board on Diversity, Equity, and Inclusion.** The full Board should receive DEI training to help the Board review and assess the Company’s DEI efforts.

C. **Facilitate Implementation of Recommendations.** As previously mentioned, Pinterest should form an Implementation Team, reporting to the Chief Executive Officer, to implement these recommendations. Effective and efficient implementation of these recommendations requires the attention and support of the Board. To that end, we recommend that the Implementation Team:

1. **Collaborate with and inform the Board.** The Chief Executive Officer should advise the Special Committee (or a similar committee of the Board) of the Implementation Team’s progress on a monthly basis for the first six months, and on a quarterly basis thereafter until implementation is complete. Where additional guidance is needed, or where the Implementation Team believes modification of a recommendation may be warranted for compelling reasons, the Implementation Team should timely escalate such requests to the Special Committee for its consideration.

2. **Prioritize key recommendations.** The Implementation Team should propose to the Special Committee a timeline and initial plan for effectively and timely implementing our recommendations.

3. **Highlight the need for additional resources.** The implementation of these recommendations -- as well as maintaining and supporting the enhanced systems and processes following the implementation of these recommendations -- will undoubtedly require the investment of additional resources. The Implementation Team should evaluate what additional resources are necessary and inform the Special Committee of the budgetary requirements. The Special Committee should, in turn, and consistent with the broader support of the full Board, ensure that Pinterest has the necessary resources to implement these recommendations.