

CODE OF CONDUCT

INTRODUCTION

The reputation of the Company depends upon the personal commitment of all employees. The Company expects you to conduct business activities with integrity and fairness and in accordance with the highest ethical standards of corporate leadership and citizenship. This commitment is the cornerstone of the Company's vitality and long-term success. By conducting business in this manner, we honor our fellow employees and customers, demonstrate how much we value them, and help to build a relationship based on trust. The Company also values the communities in which we live and do business and strongly believes that we have a social responsibility to help improve them.

The Code of Conduct (the Code) describes the kind of behavior required of all Company employees worldwide. Because we operate in many countries and are subject to different laws, customs, and practices, we will be most successful only if we are committed to a common set of values and standards. These standards apply while working or performing community service, whether on premises, at off-site locations, or at any other place where you are acting as the representative of the Company, including at Company-sponsored business and social events. All employees should exercise good judgment to maintain an honest, cooperative, positive, and productive work environment and to ensure the safety and welfare of all employees, customers, and others they encounter during their daily activities.

Salesforce.com is committed to honest and ethical conduct and fair dealing among customers, suppliers, partners, employees, and competitors. No one may take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice. At all times we must be in compliance with the letter and spirit of all applicable laws, rules, and regulations in the jurisdictions in which we operate.

Note that this Code cannot, by any means, cover every possible situation that may pose an ethical concern. The Code does not necessarily take into account all local legal requirements, and where more restrictive local laws or requirements exist, those take precedence. Each employee is expected to use his/her sound judgment in all situations and to seek guidance if necessary. If you have any questions or concerns, please contact the Company General Counsel or head of Employee Services. Employees are required to read, understand, and comply with this Code and uphold these standards in day-to-day activities.

PUBLICATION OF THE CODE OF CONDUCT; AMENDMENTS AND WAIVERS OF THE CODE OF CONDUCT & ACKNOWLEDGEMENT OF THE CODE OF CONDUCT

The most current version of this Code will be posted and maintained on the Company's Web site and filed as an exhibit to the Company's Annual Report on Form 10-K. The Company's Annual Report on Form 10-K shall disclose that the Code is maintained on the Web site and shall disclose that substantive amendments and waivers will also be posted on the Company's Web site. Any substantive amendment or waiver of this Code (i.e., a material departure from the requirements of any provision) particularly applicable to or directed at executive officers or directors may be made only after approval by the Company's Board of Directors and will be disclosed as required by the Securities & Exchange Commission and the New York Stock Exchange. Any disclosure shall include the reasons for any waiver. The Company shall retain the disclosure relating to any such amendment or waiver for no less than five (5) years.

Each employee of the Company must sign an acceptance and agreement to the terms of the Code of Conduct, and at least once each year must acknowledge their continued adherence to the Code of Conduct.

REPORTING VIOLATIONS OF THE CODE OF CONDUCT

You must report any violation or suspected violation of this Code of Conduct to the Company's General Counsel, who is the Compliance Officer for the Code of Conduct, or via the Company's anonymous and confidential reporting procedures which can be found on the Company intranet. The Company's efforts to ensure observance of and adherence to the goals and policies outlined in this Code mandate that you promptly bring to the attention of the Compliance Officer or, if appropriate, the Chair of the Audit Committee, any material transaction, relationship, act, failure to act, occurrence, or practice that you believe, in good faith, is inconsistent with, in violation of, or reasonably could be expected to give rise to a violation of this Code. You must report any suspected violations of the Company's financial reporting obligations or any complaints or concerns about questionable accounting or auditing practices in accordance with the procedures set forth below.

In the event you believe a violation of the Code, or a violation of applicable laws and/or governmental regulations has occurred or you have observed or become aware of conduct which appears to be contrary to the Code, immediately report the situation to your supervisor, the Compliance Officer or the Chair of the Audit Committee. Supervisor or managers who receive any report of a suspected violation must report the matter to the Compliance Officer.

If you have or receive notice of a complaint or concern regarding the Company's financial disclosure, accounting practices, internal accounting controls, or auditing, you must immediately advise the Compliance Officer or the Chair of the Audit Committee.

You are expected to become familiar with and understand the requirements of this Code. If you become aware of a suspected violation, do not try to investigate it or resolve it on your own. Prompt disclosure to the appropriate parties is vital to ensure a thorough and timely investigation and resolution. Appropriate personnel will review the circumstances as promptly as possible, and delay may affect the results of any investigation. A violation of the Code, or of applicable laws and/or government regulations, is a serious matter and could have substantial, adverse legal implications. Allegations of such behavior are not taken lightly and may not be made to embarrass someone or put him or her in a false light. Reports of suspected violations should always be made in good faith.

When an alleged violation of the Code, applicable laws and/or government regulations is reported, the Company will take appropriate action in accordance with the compliance procedures outlined in the Code. You are required to cooperate in internal investigations of alleged misconduct or violations of the Code or of applicable laws or regulations.

It is Company policy that there be no retaliation against any person who provides truthful information to a Company or law enforcement official concerning a possible violation of any law, regulation, or Company policy, including this Code. Persons who retaliate may be subject to civil, criminal, and administrative penalties, as well as disciplinary action, up to and including termination of employment. In cases in which you report a suspected violation in good faith and are not engaged in the questionable conduct, the Company will attempt to keep its discussions with you confidential to the extent reasonably possible. In the course of its investigation, the Company may find it necessary to share information with others on a "need to know" basis. No retaliation shall be taken against you for reporting alleged violations while acting in good faith.

COMPLIANCE PROCEDURES

The Company has established this Code as part of its overall policies and procedures. To the extent that any other Company policies and procedures may conflict with this Code, you should follow this Code. The Code applies to all Company directors and Company employees, including all officers, in all locations.

The Code is based on the Company's core values, good business practices, and applicable law. The existence of a Code, however, does not ensure that directors, officers, and employees will comply with it or act in a legal and ethical manner. To achieve optimal legal and ethical behavior, the individuals subject to the Code must know and understand the Code as it applies to them and as it applies to others. You must champion the Code and assist others in knowing and understanding it.

COMPLIANCE

You are expected to become familiar with and understand the requirements of the Code. Most importantly, you must comply with it.

CEO RESPONSIBILITY

The Company's Chief Executive Officer (CEO) shall be responsible for ensuring that the Code is established and effectively communicated to all employees, officers, and directors. Although the day-to-day compliance issues will be the responsibility of the Company's managers, the CEO has ultimate accountability with respect to the overall implementation of and successful compliance with the Code.

CORPORATE COMPLIANCE MANAGEMENT

The CEO has selected an employee to act as the Corporate Compliance Officer. The Corporate Compliance Officer is currently the Company's General Counsel. The Compliance Officer's charter is to ensure communication, training, monitoring, and overall compliance with the Code. The Compliance Officer will, with the assistance and cooperation of the Company's officers, directors, and managers, foster an atmosphere where employees are comfortable in communicating and/or reporting concerns and possible Code violations.

INTERNAL REPORTING OF VIOLATIONS

The Company's efforts to ensure observance of, and adherence to, the goals and policies outlined in this Code mandate that all employees, officers, and directors of the Company report suspected violations in accordance with this Code.

SCREENING OF EMPLOYEES

The Company shall exercise due diligence when hiring and promoting employees and, in particular, when conducting an employment search for a position involving the exercise of substantial discretionary authority, such as a member of the executive team, a senior management position, or an employee with financial management responsibilities. The Company shall make reasonable inquiries into the background of each individual who is a candidate for such a position. All such inquiries shall be made in accordance with applicable law and good business practice.

ACCESS TO THE CODE

The Company shall ensure that employees, officers, and directors may access the Code on the Company's Web site. In addition, each current employee will be provided with a copy of the Code. New employees will receive a copy of the Code as part of their new hire information. From time to time, the Company will sponsor employee training programs in which the Code and other Company policies and procedures will be discussed.

MONITORING

The officers of the Company shall be responsible for reviewing the Code with all of the Company's managers. In turn, the Company's managers with supervisory responsibilities should review the Code with their direct reports. Employees should contact their managers if they have questions and concerns relating to the Code, especially in the event of a potential violation. Managers or supervisors will immediately report any violations or allegations of

violations to the Compliance Officer. Managers will work with the Compliance Officer in assessing areas of concern, potential violations, any needs for enhancement of the Code or remedial actions to effect the Code's policies and overall compliance with the Code and other related policies.

AUDITING

An internal audit team selected by the Audit Committee of the Board will be responsible for auditing the Company's compliance with the Code.

INTERNAL INVESTIGATION

When an alleged violation of the Code is reported, the Company shall take prompt and appropriate action in accordance with the law and regulations and otherwise consistent with good business practice. If the suspected violation appears to involve either a possible violation of law or an issue of significant corporate interest, or if the report involves a complaint or concern of any person, whether employee, or shareholder, or other interested person regarding the Company's financial disclosure, internal accounting controls, or auditing matters or practices or other issues relating to the Company's accounting or auditing, then the manager or investigator shall immediately notify the Compliance Officer, who, in turn, shall notify the Chair of the Audit Committee.

If a suspected violation involves any director or executive officer, or if the suspected violation concerns any fraud, whether or not material, involving management or other employees who have a significant role in the Company's internal controls, the alleged violation should be immediately reported to the Compliance Officer. If appropriate, it should also be reported to the Chief Executive Officer, and/or the Chief Financial Officer, and, in every such case, the Chair of the Audit Committee. The Compliance Officer or the Chair of the Audit Committee, as applicable, shall assess the situation and determine the appropriate course of action. At a point in the process consistent with the need not to compromise the investigation, a person who is suspected of a violation of the Code shall be apprised of the alleged violation and shall have an opportunity to provide a response to the investigator.

DISCIPLINARY ACTIONS

Subject to the following sentence, the Compliance Officer, after consultation with the head of Employee Services, shall be responsible for implementing the appropriate disciplinary action in accordance with the Company's policies and procedures for any employee who is found to have violated the Code. If a violation has been reported to the Audit Committee, or another committee of the Board, that Committee shall be given appropriate opportunity to provide input for determining appropriate disciplinary action. Any violation of applicable law or any deviation from the standards embodied in this Code will result in disciplinary action, up to and including termination of employment. In addition to imposing discipline upon employees involved in non-compliant conduct, the Company also will impose discipline, as appropriate, upon an employee's supervisor, if any, who directs or approves such employees' improper actions, or is aware of those actions but does not act appropriately to correct them, and upon other individuals who fail to report known non-compliant conduct. In addition to imposing its own discipline, the Company will bring any violations of law to the attention of appropriate law enforcement personnel.

RETENTION OF REPORTS AND COMPLAINTS

All reports and complaints made to or received by Compliance Officer or the Chair of the Audit Committee shall be logged into a record maintained for this purpose by the Compliance Officer and this record of such report shall be retained for a minimum of five (5) years.

REQUIRED GOVERNMENT REPORTING

Whenever conduct occurs that requires a report to the government, the Compliance Officer shall be responsible for complying with such reporting requirements.

CORRECTIVE ACTIONS

Subject to the following sentence, in the event of a violation of the Code, the manager and Compliance Officer should assess the situation to determine whether the violation demonstrates a problem that requires remedial action as to Company policies and procedures. If a violation has been reported to the Audit Committee or another committee of the Board, that committee shall be given appropriate opportunity to provide input for determining appropriate remedial or corrective actions. Such corrective action may include providing revised public disclosure, retraining Company employees, modifying Company policies and procedures, improving monitoring of compliance under existing procedures, and other steps necessary to detect similar non-compliant conduct and prevent it from occurring in the future. Such corrective action shall be documented, as appropriate.

CONFIDENTIALITY

In the course of your employment with the Company, you may have access to Confidential Information regarding the Company and those with whom we do business (e.g. customers, vendors or others). Confidential information may include software and other inventions or developments (regardless of the stage of development) produced or licensed by or for us, or our business strategy, future plans, financial information, contracts, suppliers, customers, prospects, personnel information, or other information that we consider proprietary and confidential.

Maintaining the confidentiality of this information is vital to our competitive position in the industry and, ultimately, to our ability to achieve financial success and stability. You must protect this information by safeguarding it, using it only for business needs and disclosing it only when authorized to do so and to those who have a legitimate business need to know about it. This duty of confidentiality applies during and even after your employment with the Company. The Company will pursue legal remedies for unauthorized disclosures of Confidential Information. Additionally, as a condition of employment, you must sign our Employee Proprietary Information & Rights Agreement.

The Company respects your nondisclosure and related agreements with your former employers and requires that you comply with them. You are not permitted to possess or use proprietary information belonging to another company without the permission of that company.

At times, individuals or other companies may volunteer Confidential Information regarding their business plans or product in seeking a business relationship with the Company. At other times, we may ask that a third party provide us with Confidential Information to allow us to evaluate a potential business relationship with that party. Frequently, we sign nondisclosure agreements and must at all times uphold the Company's confidentiality policy and handle others' information responsibly. An unintentional disclosure of Confidential Information can be just as harmful as an intentional one. To avoid unintentional disclosures, never discuss with any unauthorized person (non-employees, competitors, the media) information that has not yet been disclosed or made public by Company management. This policy also applies to discussions with family members or friends who might innocently or inadvertently pass the information on to someone else.

DOCUMENT RETENTION

In general, you should keep documents and records that are necessary for conducting business and maintaining adequate records of the Company's historical business, but should dispose of unnecessary documents, drafts, and duplicates (in both hard copy and electronic formats). Keeping good records and disposing of unnecessary ones creates efficiencies, conserves valuable electronic and physical storage resources, reduces time spent reviewing irrelevant or superseded records, and helps the Company focus better on its operations and customers. In addition to retaining records as a matter of good business sense, the Company also may be required to retain certain records by law or regulation.

From time to time, it may be necessary to retain, over a certain time period, all copies (whether electronic or hard copy) of certain categories of documents. If there is such a need, you will receive instructions from your manager or an officer of the Company. In general though, employees may dispose of documents in the ordinary course of business. Employees in Finance, Employee Services, Legal, and other groups may be subject to more specific document retention policies, which will be adopted by the managers of these groups. If you have any questions about document retention, please refer to the General Counsel or Chief Financial Officer. Confidential Records that are not retained should be disposed of permanently by deleting computer files and shredding paper records.

GIFTS, GRATUITIES, AND FAVORS

Giving and receiving gifts as part of business dealings can create conflicts of interest. The purpose of gifts and favors is generally to create marketing awareness and good will. If they do more than that, and unduly influence judgment or create a feeling of obligation, they may not be given or accepted.

You must not give gifts to or receive gifts from Company business contacts, relatives, suppliers, vendors, or others who have a business relationship with the Company if they create the slightest conflict. Examples are: vacations, stock or any other items of more than a nominal value (greater than \$150). You should decline such gifts and tell the giver that Company policy prohibits their acceptance. Nor shall you accept compensation from a third party that is dealing with the Company, without express written prior approval of the General Counsel. In many instances, the giving of gratuities of even nominal value, such as meals, is prohibited when dealing with any government agency. If you are giving items of nominal value that are permissible hereunder, you must ensure that the recipient's company policy allows him/her to accept the gift. Of course, you may pay for or accept business entertainment such as meals and sporting event tickets if the expense is reasonable and directly related to Company business. A final test of appropriate business courtesies is whether public disclosure would be embarrassing to the Company or the recipient.

You must also use special care when operating in countries with cultures and laws that are different from your own. You may give or accept gifts if not doing so would reflect unfavorably on the Company, but such gifts must be reported to the Company. In no event should you ever give gifts if it would violate either U.S. laws or the laws of the country in question.

The Company as part of its marketing efforts may from time to time invite and pay for attendance of customers or others at its events that have been approved by the CEO and notice made to Corporate Marketing. In addition, the President's Committee may in its discretion as a waiver of this Code of Conduct, permit attendance of Company employees at similar events sponsored by the Company's vendors, customers, partners, or other third parties in connection with the employee's duties with the Company.

PROHIBITION OF PERSONAL LOANS

The Company will not make any new extension of credit, or arrange for the extension of credit, in the form of a personal loan to any director or executive officer of the Company, and will not make any material modifications to, or renewals of, any existing loan arrangements.

MISREPRESENTATION OF FACTS

Misrepresenting facts about the Company, its services or products, or other aspects of its business is against Company policy. You may not misrepresent the capabilities of the Company's services or the ability of the Company to provide a solution to a customer. If you make false or misleading statements regarding the Company's competitors, customers or suppliers, or their products, disciplinary action up to and including termination will occur. You may not enter into any side agreements with customers, vendors, or partners. Such agreements may include or take the form of oral promises, email agreements, or written letters.

CONFLICTS OF INTEREST

You must perform your duties to the Company in an honest and ethical manner. You must handle all actual or apparent conflicts of interest between your personal and professional relationships in an ethical manner.

You should avoid situations in which your personal, family, or financial interests conflict or even appear to conflict with those of the Company. You may not engage in activities that compete with the Company or compromise its interests. You may not take for your own benefit opportunities discovered in the course of employment that you have reason to know would benefit the Company. The following are examples of actual or potential conflicts:

- you, or a member of your family, receive improper personal benefits as a result of your position in the Company;
- you use Company's property for your personal benefit;
- you engage in activities that interfere with your loyalty to the Company or your ability to perform Company duties or responsibilities effectively;
- you work simultaneously (whether as an employee or a consultant) for another company;
- you, or a member of your family, have a financial interest in a customer, partner, supplier, or competitor which is significant enough to cause divided loyalty with the Company or the appearance of divided loyalty (the significance of a financial interest depends on many factors, such as size of investment in relation to your income, net worth and/or financial needs, your potential to influence decisions that could affect your interests, and the nature of the business or level of competition between the Company and the supplier, customer, or competitor);
- you, or a member of your family, acquire an interest in property (such as real estate, patent, or other intellectual property rights or securities) in which you have reason to know the Company has, or might have, a legitimate interest;
- you, or a member of your family, receive a loan or a guarantee of a loan from a customer, supplier, or competitor (other than a loan from a financial institution made in the ordinary course of business and on an arm's-length basis);
- you divulge or use the Company's confidential information, such as financial data, customer information, or computer programs, for your own personal or business purposes;
- you make gifts or payments or provide special favors, to customers, suppliers, or competitors (or their immediate family members) with a value significant enough to cause the customer, supplier, or competitor to make a purchase or take or forego other action, which is beneficial to the Company and which the customer, supplier, or competitor would not otherwise have taken; or
- you are given the right to buy stock in other companies, or you receive cash or other payments in return for promoting the services of an advisor, such as an investment banker, to the Company.

Neither you, nor members of your immediate family, are permitted to solicit or accept valuable gifts, payments, special favors, or other consideration from customers, suppliers, or competitors. Conflicts are not always clear-cut. If you become aware of a conflict described above or any other conflict or potential conflict, or have a question as to a potential conflict, you should consult with your manager or the Company's General Counsel and/or follow the procedures already described in the section "Reporting Violations of the Code of Conduct".

If you become involved in a situation where your interests and those of the Company conflict, you must inform and receive written approval from your supervisor or the Company's General Counsel of the conflict. Or, in the case of serving on the board of directors of another company, you must obtain prior written approval from the General Counsel and the CEO.

COMPETITION AGAINST THE COMPANY

An obvious conflict of interest is providing assistance to an organization, with or without compensation, that markets products or services in competition with the Company's current or potential offerings. You may not advise, assist, or work for any such organization, whether as an employee, volunteer, intern, consultant, or a member of such organization's board of directors. Such activities are prohibited because they divide your loyalty between the Company and the competing organization.

If you are contemplating an outside business activity, you must consult with your manager prior to engaging in such activity, to determine whether the activity will compete in any way with the Company or otherwise pose a conflict of interest. Failure to do so and/or unauthorized participation in any such activity may result in disciplinary action, up to and including termination of your employment.

CORPORATE OPPORTUNITIES

A corporate opportunity is any potential business opportunity that the Company might wish to pursue. Any corporate opportunity that comes to your attention must be promptly and fully disclosed and presented to the Company. The Company will evaluate the opportunity and either (i) inform you that the Company wishes to preserve the opportunity for itself, or (ii) consent to letting you pursue the opportunity independently.

INSIDER TRADING

You are prohibited under both federal law and Company policy from purchasing or selling Company stock, directly or indirectly, on the basis of material, non-public information about the Company. Any person possessing material, non-public information about the Company must not engage in transactions involving Company securities (including any derivatives thereof) until this information has been released to the public and the market has an opportunity to absorb and react to it. You are also prohibited from "tipping" other people by passing along material and non-public information about the Company. You are obligated to follow the Company's Insider Trading Policy.

NON-SOLICITATION OF CUSTOMERS' EMPLOYEES

Our common goal is to continue to attract the best and the brightest people to join us. While we hope you will encourage highly qualified people to seek employment with our Company, please recognize the sensitivity of recruiting from our customer base. We need to maintain the very best relations with all of our customers. To avoid disruption of our customers' workplaces and potential conflicts for our Company, you are requested not to solicit employees of our customers for employment at our Company.

QUARTER AND YEAR END CERTIFICATION PROCESS

In conjunction with the end of each quarter and fiscal year, employees may be required to sign a certification acknowledging they have performed their duties in compliance with the Company's policies and business practices and, if applicable, notifying Company management of any conduct the employee is aware of that is not consistent with these policies and business practices.

FULL, FAIR, ACCURATE, TIMELY, & UNDERSTANDABLE DISCLOSURE

It is of paramount importance to the Company that all disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company is full, fair, accurate, timely, and understandable. You must take all steps available to assist the Company in these responsibilities consistent with your role within the Company. In particular, you are required to provide prompt and accurate answers to all inquiries made to you in connection with the Company's preparation of its public reports and disclosure.

INFLUENCING AUDITORS

You may not influence, coerce, manipulate, or mislead any auditor, internal or independent, who is auditing the Company's financial statements, for the purpose of rendering the financial statements materially misleading, or for any other purpose.

SIGNATURE POLICY

The Company has adopted a signature policy that is designed to make certain all contracts and other agreements are reviewed for their terms and for compliance within the Company's budget. The signature policy is available on the Company intranet and sets forth who is authorized to sign contracts on the Company's behalf. If you are not named on the signature policy, you are not authorized to sign documents or legally bind the Company to any contract or other agreement.

FOREIGN CORRUPT PRACTICES ACT

BRIBERY, KICKBACKS, AND OTHER IMPROPER PAYMENTS

You may not directly or indirectly promise, offer, or make payment in money or anything of value to anyone, including a government official, agent, or employee of a government, political party, or business entity, with the intent to induce favorable business treatment or to improperly affect business or government decisions.

You should be aware that the Company is subject to a set of laws known as the Foreign Corrupt Practices Act (FCPA) with which you must comply. In general, the FCPA prohibits U.S. companies and their subsidiaries (including all officers, directors, employees, and agents thereof) from making payments or gifts of anything of value to foreign government officials for the purpose of influencing such an official to obtain or retain business. Also prohibited are payments made with a wrongful or corrupt intent, i.e., payments the Company knew or should have known were intended to influence the official or the government. Companies also may not circumvent the FCPA by using a third party to make such payments or arrangements. There are a few very narrow exceptions to these prohibitions.

If a company is public, the FCPA requires it to maintain certain internal accounting controls and to keep books and records that accurately reflect all transactions. There are criminal and civil penalties for violations. For clarification of FCPA and similar responsibilities, please contact the General Counsel or Chief Financial Officer.

PROTECTION AND PROPER USE OF COMPANY ASSETS

With the limited exceptions outlined elsewhere in the Employee Handbook, Company assets and property should only be used for legitimate business purposes, and you should take appropriate safeguards to prevent misuse, loss, or theft. Company assets are both tangible and intangible, and include intellectual property such as trade secrets, patents, trademarks, and copyrighted materials, business and marketing plans, engineering and design documents and ideas, Company records, salary and evaluation information, and any unpublished financial data and reports. Unauthorized use, alteration, destruction, disclosure, possession, or distribution of Company assets violates Company policy and this Code of Conduct. The data that customers have entrusted to the Company are also a Company asset, and you should in every instance follow the Company's policies regarding access to and use of that data.

Obtaining, distributing, or using unlicensed copyrighted software or information, without proper authorization from the copyright holder, is prohibited. You must respect at all times all copyright protections regarding use of software and information, and must attribute authorship where appropriate. With respect to software, copying unlicensed, copyrighted software to a Company computer is not only illegal, but also exposes you as well as the Company to liability for copyright infringement. If you have unlicensed software on your Company-issued equipment you will be subject to disciplinary action, up to and including termination of employment. The Company expects you to respect the intellectual property rights of others.

FAIR DEALING

You should endeavor to deal honestly with the Company's customers, suppliers, competitors, and employees. Under federal and state laws, the Company is prohibited from engaging in unfair methods of competition and unfair or deceptive acts and practices. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing.

Examples of prohibited conduct include, but are not limited to:

- engaging in bribery or payoffs to induce business or breaches of contracts by others;
- acquiring a competitor's trade secrets through bribery or theft;
- making false, deceptive, or disparaging claims or comparisons about competitors or their products or services; or
- mislabeling products or services.

ANTITRUST COMPLIANCE. COMPETITION

The Company is committed to fair competition and adherence to antitrust laws. It is prohibited for you to enter into an agreement or understanding (written or oral, expressed, or implied) with any competitor concerning the following: prices, discounts or other terms or conditions of sale, profits or profit margins, costs, allocation of products or geographic markets, allocation of customers, limitations on production, boycotts of customers or suppliers, or bids or the intent to bid, or even to discuss or exchange information on these subjects. These are only some of the activities that could violate antitrust laws. If you have any questions or would like to seek advice regarding permissible activities, please contact the Company General Counsel.