



Salesforce

CODE OF CONDUCT



A MESSAGE FROM MARC BENIOFF AND KEITH BLOCK

Dear Salesforce employees:

Here at Salesforce, we live and work by a set of core values: earning the trust of our Ohana, driving customer success, delivering constant innovation, and upholding the equality of every human being. By putting our values into action every day, we continue to strengthen our position as the world's #1 CRM company and transform the world of enterprise software.

Our Code of Conduct ensures that our core values remain at the heart of everything we do and directly impacts our ability to deliver success. As members of our Ohana, every one of us commits to acting with integrity and treating others with compassion and respect, and to always do right by the people who depend upon us.

That's why we ask each of you at Salesforce to make a personal commitment to follow our Code of Conduct. The Code of Conduct sets guiding principles based on our core values to help you make the right decisions and take the right action in any situation. You'll also find practical guidance for handling situations where doing the right thing may not be immediately clear.

If you're ever unsure about what to do or concerned about a potential violation of the Code of Conduct, please speak up. Talk to your manager or reach out to your contact in our Legal Department or via legalcompliance@salesforce.com.

You may also share concerns anonymously in specific regions and countries, depending on local law, through our EthicsPoint hotline. Remember, our non-retaliation policy means that you don't need to be afraid of asking questions or reporting potential issues. In fact, we encourage it – because every single one of us has a responsibility to uphold our values.

Thank you for everything you do to contribute to Salesforce, our culture, and our customers every day.

Aloha,

Marc Benioff and Keith Block
Co-Chief Executive Officers



PART 1: THE CODE OF CONDUCT

This Code of Conduct outlines how Salesforce and its affiliates and subsidiaries conduct business and describes the company's most fundamental shared values. It also helps us understand how our values affect the way the company does business.

It is always important to treat others well and do right by the people who depend on the company. Referring to this Code and following company policies, applicable laws, rules and regulations at all times will help enable you to make the right choices. If you have questions or concerns about a section of this Code, a company policy, law, rule, or regulation, you should contact the Legal Department at legalcompliance@salesforce.com.

Every person can make a big difference, so it is vital that all employees act with integrity and in accordance with local laws. That is why this Code applies to everyone at Salesforce, including at our subsidiaries. Above all, this Code helps employees maintain the trust Salesforce has built with its customers, employees, stockholders, and others who have a stake in the company's success. That trust is what helps all Salesforce employees succeed every day.

How to Raise Questions and Report Concerns

Why is it critical to raise a question or concern?

If you are not sure how to handle something, or if you think there is a problem, speak up! No matter how small the issue is, the company wants to hear from you. The company cannot fix issues that it does not know about.

Whom should I contact?

If you have questions or want to raise a concern, get in touch with one of these resources:

- Your manager, or another manager you trust
- Employee Success ("ES") – go to Concierge, or call:
US and Canada – (855) DRMJOBS/ (855) 376-5627
EMEA – 00.800.1DRMJOBS/00.800.1376.5627
- The Legal Department at legalcompliance@salesforce.com
- EthicsPoint Reporting Line (in the U.S., 1-866-294-3540, internationally via collect call at +1-503-726-2414, or at <http://www.salesforce.ethicspoint.com/>)

If you report using EthicsPoint, you may be able to report anonymously, depending on the local laws where you work. Please provide as much information as possible so that your report can be fully investigated.

Good faith reporting and non-retaliation

Acting in *good faith* means that all reports of possible violations of this Code, company policy, or the law are made sincerely and honestly. In other words, it does not matter whether your report turns out to be true, but you must make it with the best intentions.



In return, the company is committed to non-retaliation. In order to operate effectively, it is vital for all company employees to trust and respect each other. Retaliating against someone who has made a report or participated in an investigation is not tolerated.

Investigations and discipline

Reports will be investigated in a respectful, professional manner as promptly and confidentially as possible. If you are asked to participate in an investigation, you are required to cooperate fully.

Violations of this Code and other company policies are taken seriously. There are consequences for violating this Code or other company policies, which may include discipline up to and including termination of employment.

Expectations for Managers

While this Code applies to everyone at Salesforce equally, employees in a managerial role have extra responsibilities. If you are a manager, you have an incredible opportunity to set the right tone for your team, including by doing the following:

- Lead by example, always choosing to act with integrity.
- Speak up when you see a problem and encourage others to do the same.
- Make sure your direct reports understand this Code and what is expected of them.
- Always be receptive to questions, concerns, or comments, and make sure that issues are directed to the people who can help.
- Escalate matters that may indicate a violation of the Code or any other company policy to your manager, the Legal Department, Employee Success, or through [EthicsPoint](#).

[Go to Reporting Q&As](#)



TRANSPARENCY

Recognizing Conflicts of Interest

Part of Salesforce's culture is a spirit of open communication and cooperation for the good of the company. When employees are open about potential conflicts, it is easier to find a way to minimize the problems.

What conflicts are and how to disclose them

A *conflict of interest* is a situation where an opportunity for personal gain is contrary to the company's best interests.

Avoid even the appearance of a potential conflict of interest. If you believe that you may have a potential conflict of interest, discuss it with your manager right away. Your manager can help you work out a way to manage the conflict. Remember, it is your responsibility to act appropriately until the situation has been addressed.

Working with family members

It is natural to want the best for your family, but when family members interact in the workplace it is easy for it to look like favoritism. Addressing these situations proactively can prevent problems.

If two family members both work for Salesforce, they should not work in the same reporting chain without approval from the Legal Department.

If your family member owns or works for a company that does business with Salesforce, you must disclose this fact. Absent pre-approval by the Legal Department, you may not manage the relationship with the other company.

A *family member* is a parent, sibling, spouse, child, in-law, grandparent, grandchild, step-relative, domestic partner, or any other person who regularly resides in your household.

Outside work

You are expected to devote your full professional energies to your work at Salesforce. All side jobs or personal business activities that are profit-related need to be disclosed to the Legal Department. Salesforce encourages everyone to participate in nonprofit activities, consistent with our commitment to giving back to our communities.

- For any **profit-related activities**, including being asked to sit on the Board of Directors or Advisory Board of a for-profit organization, you need approval from your manager and the General Counsel, even if you are not personally being compensated for the outside activity. Only very limited for-profit activity is allowed. Click [here](#) to access a request form.
- For any **nonprofit activities** that would conflict or could conflict with the company's business, you need approval from your manager. If you have been asked to sit on the Board of Directors of a nonprofit organization, you also need to get approval from your manager and the General Counsel. Click [here](#) to access a request form.



Financial interests

Holding a significant or controlling interest in one of Salesforce's competitors, customers, or suppliers could create a divided loyalty, or at least the appearance of one. This also applies to financial interests held by a member of your household or immediate family. Financial interests that pose a potential conflict of interest require approval from your manager and the General Counsel. In addition, the Board of Directors has adopted guidelines relating to potential conflicts of interest that may arise in connection with investments by company officers in privately held companies. Such investments generally require pre-clearance by the Legal Department. Click [here](#) to access the guidelines.

Corporate opportunities

Employees cannot take advantage personally of business or investment opportunities that are discovered through the use of company property, business, or information. Such actions are considered to be competing with Salesforce and must be avoided.

Gifts and Entertainment

Gifts are usually goods or services, but can be any item of value, including entertainment. Exchanging gifts and entertainment can help build strong working relationships with customers and other business partners. In some cases, however, gifts and entertainment may create a conflict of interest or unfair bias that could influence business decisions or be seen as bribes. Review the rules in the [Global Gifts and Entertainment Guidance](#), [Global Anti-Corruption Policy](#), and related expense report rules to make sure you know the company's policies in this area. Ask your manager if you have any questions. Generally, if your gift does not involve a government official, a gift under \$150 per person is permissible, preferably showing the Salesforce logo. Employees should seek Legal pre-approval via the [GEM app](#) when giving gifts to or entertaining government officials.

Anti-Corruption, Bribery, and Kickbacks

Never resort to bribery, facilitation payments, kickbacks, or corrupt practices.

Bribery is offering or giving anything of value in order to improperly influence the recipient's actions. Examples can include cash, cash equivalents, gifts, entertainment, travel, lodging, charitable contributions, and offers of employment. Bribery is illegal in every jurisdiction in which Salesforce does business.

A *facilitation payment* is a tip or small payment made to a government official in order to expedite a routine government action, such as issuing a permit or providing utility service. This is illegal in most jurisdictions and not allowed under the [Global Anti-Corruption Policy](#).

A *kickback* is the return of a sum paid (or due to be paid) as a reward for fostering a business arrangement. Accepting or offering a kickback violates this Code.

Bribery is illegal in the U.S. and most other countries and the consequences are severe, including jail sentences.



Relationships with government officials

If you interact with government officials on Salesforce's behalf, be particularly careful about gifts, meals, and entertainment. Laws and regulations governing what companies like Salesforce can give government officials are very strict, including in the U.S. Be sure you know what the rules are under the [Global Anti-Corruption Policy](#). Contact the Legal Department for approval before offering or providing any gifts, meals, or entertainment to government officials. All interactions with government officials that are not sales-related require the oversight of our Government Affairs team.

A *government official* can be a national or local government employee, a political candidate, a party official, a member of a royal family, or an employee of a government-controlled entity, such as a state-owned enterprise. For more information, please refer to the [Global Anti-Corruption Policy](#).

Salesforce does business with governmental entities in the U.S. and around the world, and these government contracts are highly regulated. The [U.S. Public Sector Addendum](#) to the Code of Conduct covers the unique legal, ethical, and other requirements that apply to Salesforce's government contracts in the U.S. All employees who support U.S. federal, state, and/or local government customers must understand and follow the policies outlined in this Addendum. Unsure if you're doing business with a government entity? Contact the Legal Department for guidance.

Third parties

The company may engage with third parties such as agents, consultants, suppliers, resellers, or distributors, only after they have passed a legal due diligence process. Contact the Office of Global Ethics & Integrity for further information about the due diligence process.

Financial Integrity, Records, and Accounting

Salesforce's books, records, accounts, and financial statements must be maintained in appropriate detail so that they properly reflect the company's business activities. Doing so is required both by law and by the company's system of internal controls. Further, the company's public financial reports must contain full, fair, accurate, timely, and understandable disclosures, which help ensure investors have access to accurate information about the company and is required by law. The company's financial, accounting, and legal groups are responsible for procedures designed to assure proper internal and disclosure controls, and everyone must cooperate with these procedures. For additional information on your specific responsibilities in ensuring the integrity of the company's books, records, accounts, and financial statements, see the [Anti-Fraud Policy](#).

All information must be recorded accurately, whether it is tracking work hours, expenses (including your expense reports), or sales contracts. When these are timely and accurate, the company is able to make informed decisions about how to run its business and plan for the future. Company records, including disclosures and filings, must be accurate, complete, and timely, so that Salesforce fulfills its obligations to external stakeholders, including its stockholders.



Document management and retention

When deciding what documents to save, archive, or trash, always check the [Records Management Policy](#), [Records Management Procedures Manual](#) and [Records Retention Schedule](#) for details about how long various documents should be retained. This policy applies to all kinds of documents, both paper and electronic.

At some point you may be notified that a “legal hold” has been placed on documents in your possession. If this happens, please review the legal hold notice carefully. If you have any questions about the notice and what you should do, please reach out to the Legal Department so that you are 100% clear regarding your obligations. The key thing to remember is never to alter, conceal, or destroy any document under a legal hold.

Outside Audits and Investigations

From time to time, you may encounter internal and external auditors, attorneys, or investigators who request information from you on behalf of the company and at the direction of the Legal Department. You are required to provide these individuals with timely and accurate information. Never mislead or attempt to influence any investigation, audit, or inquiry.

Salesforce sometimes receive requests for information from national or local government officials. If they contact you, be sure to notify Legal for assistance in handling the request promptly, accurately, and completely.

Understanding Insider Trading

Trading securities, or telling others to trade securities, while in possession of material information that is not known to the public is strictly prohibited “insider trading,” whether it is information about Salesforce or another company. Trading while in possession of inside information is illegal.

Information is *material* if a reasonable investor would consider it important in deciding whether to buy, hold, or sell a company’s securities.

Information that is material and is not available to the public is called *inside information*. Common examples of inside information include key changes in management, mergers and acquisitions, other major business plans, and financial results that have not been released outside Salesforce. Trading while in possession of inside information is illegal.

You cannot give inside information to anyone else, either. This is known as *tipping*, and is also illegal. Consequences for violations are severe, including jail time.

See the [Insider Trading Policy](#) for more information.



Handling Imports and Exports

When delivering products or services internationally, keep in mind that there may be additional steps required to comply with local laws and regulations.

You are responsible for knowing and following the appropriate rules and procedures for imports and exports. If you are involved in international transactions, it is important to know what is expected of the company, including any requirements related to taxes, verification, licensing, and permits. For additional information on handling imports and exports, see the [Global Trade and Customs Policy](#) as well as the company's [Compliance website](#).

[Go to Transparency Q&As](#)



TRUST

Using Technology and Other Tools

Salesforce trusts its employees with a wide range of technology and other tools that make it possible to do their jobs effectively, and these tools must be used wisely.

Using company technology appropriately

The computers, mobile phones, and other devices that Salesforce provides are company property. The same is true of the company's email system and Internet access. A certain amount of personal use is permitted, but company technology should mainly be used only for business purposes.

Since all of these tools and technology belong to the company, employees should not have any expectation of privacy in their use. Salesforce may monitor anything created, stored, sent, or received on company technology, to the extent allowed by law. Do not use company technology to violate the law or Salesforce policies or to create, store, or send content that others might find offensive.

It is also important to carefully avoid any usage that might lead to loss or damage, such as a breach of the company's IT security protocols.

Use of funds and physical assets

Company property also includes Salesforce's brand and reputation, funds, facilities, and employee work time.

Protecting Sensitive Information

Company information

Many details about how the company operates need to be kept confidential in order for Salesforce to remain competitive and successful.

You are responsible for safeguarding all confidential and sensitive data such as:

- Business plans or strategies
- Financial results
- Product designs and concepts
- Sales goals and marketing plans
- Terms and conditions, rates, or fees offered to particular customers
- Other, non-public information that might be of use to competitors

For detailed information about how to protect information and what your specific responsibilities are, see the [Information Security Policy](#).

Intellectual property

Salesforce depends on good ideas, so it is important to protect those ideas through legal tools such as copyrights and patents. Collectively, all of this intangible property is called *intellectual property (IP)*, and



it includes all copyrights, patents, trademarks, trade secrets, design rights, logos, and brands. Keep in mind that Salesforce owns the rights to all IP created with company materials or on company time.

Third parties' and previous employers' information

In some cases, employees may be responsible for protecting information that belongs to other people or companies. For more information on protecting third party information, see the company's [Trust website](#).

Who, exactly?

- **Third parties.** In the course of doing business, sometimes employees will learn confidential information about customers, suppliers, and other business partners. Protecting the data of these third parties is one of Salesforce's highest values.
- **Former employers.** When a new team member joins Salesforce, employees must understand and respect that this person cannot share confidential information about previous employers. Never share any confidential information from your prior employer or ask others to do so from theirs. Similarly, you are responsible for protecting Salesforce's information if you leave the company.

Data Privacy

Customer data, personal data, and the systems that process such data must be protected and handled transparently. All employees are expected to follow global privacy laws and honor customers' choices to keep their data secure and confidential. Salesforce also provides employee [notices](#) that detail how employee data can be collected, used, and shared.

Salesforce safeguards confidential customer data and personal data and limits access only to those people who need it to do their job.

- **Customer data** includes data such as contacts, account information, marketing data, health data, and any other information that a customer processes or stores on Salesforce services.
- **Personal data** includes data such as home addresses, medical information, Social Security numbers, IP addresses, fingerprints, location data, and characteristics that can be tied to an individual.

Be sure you know what the rules are under the [Global Controller Privacy Policy](#). In addition, Salesforce has established a set of [Processor Binding Corporate Rules](#) approved by European Union data protection authorities and which must be followed by all employees.



Competing Fairly

All employees are expected to follow competition laws throughout the world, which ensure a level playing field for all businesses.

These laws (also known as *antitrust laws* in the U.S.) prohibit agreements that would restrain trade. For example, a few common—and illegal—examples may include:

- Price fixing, where competitors or partners agree to charge a certain price for certain products or services
- Bid rigging, where competitors agree among themselves to bid in a way that allows a certain bidder to win
- Dividing or allocating markets, where competitors agree to limit their sales presence so that each company can be the only available choice for buyers in a given market
- Boycotting, where competitors agree to avoid a particular customer or supplier
- Agreements among companies not to hire their respective employees

Keep in mind that agreements do not have to be signed contracts to be illegal. An informal understanding between you and a competitor, or even a conversation that implies an understanding, may be a problem. If any of these topics come up while you are talking with a competitor, stop the conversation immediately and report it to the Legal Department. For more information on competing fairly, see the [Global Antitrust Policy](#).

Fair Dealing

Salesforce is committed to being honest and truthful with all of its customers, vendors, and other business partners. Never misrepresent the quality, features, or availability of the company's products, and never do anything illegal or lacking integrity to win business. For additional information on the company's commitment to fair dealing and your specific responsibilities in preventing fraud, see the [Anti-Fraud Policy](#).

Trying to obtain information by lying or pretending to be someone you are not is unethical and could be illegal. Don't do it. And if you receive another company's confidential or proprietary information by mistake, return or destroy it. You may also reach out to the Legal Department for questions.

[Go to Trust Q&As](#)



RESPECT

Diversity and Non-Discrimination

It is important to have a diverse team and an inclusive workplace, and diversity of opinion, background, and culture makes Salesforce a more creative, innovative company. Accordingly, employment decisions like hiring, firing, and promoting are never based on legally protected personal characteristics.

While these characteristics may vary by local law, they generally include:

- race
- color
- religion
- sex
- national origin or ancestry
- age
- medical condition or disability
- veteran status
- marital status
- pregnancy
- sexual orientation
- gender identity or expression

Instead, Salesforce offers equal opportunities based on skills and aptitude.

Personal Dignity

Salesforce believes every human life has equal value and should be treated with dignity and respect. Our approach is described in these [Business Conduct Principles](#).

Harassment and bullying are not tolerated at Salesforce.

Harassment is any conduct relating to a person's legally-protected characteristics that creates an unwelcome, intimidating, hostile, or offensive work environment for that person. That can range from offensive jokes or comments, slurs and name calling, and any act of bullying, or exclusion. It also includes sexual harassment, including unwanted sexual advances, suggestive comments or inappropriate touching. You can find the *Harassment Policy* [here](#) or on the company's policy tool, [Policyforce](#).



Workplace Security and Safety

Salesforce is committed to providing a healthy, safe, and secure work environment to our employees, contractors, and visitors. Our programs focus on general security and safety awareness, training, reporting, and proactive risk identification and response. Follow all security and safety rules and report unsafe situations. For more information, refer to the [Health & Safety Policy](#).

Violence and weapons

Violence and threats of violence are not acceptable at Salesforce. Possession and use of weapons are also prohibited in the workplace. If you believe someone is in immediate danger, contact the local authorities right away. You can find more information on the company's Violence Prevention program [here](#).

Substance abuse

The use of illegal drugs and inappropriate or excessive use of alcohol are not permitted in the workplace. For more information, refer to the [Alcohol, Drugs & Illegal Substance Abuse policy](#).

See Something, Say Something

You are the company's first line of defense. If you see something suspicious, say something by reporting safety and security concerns to the Global Operations (GO) Center or local security representative, via the [See Something, Say Something app](#), or in the case of immediate life-safety danger, to local authorities. Reporting helps Salesforce keep our people and our brand safe.

Security Access Badges

The security of the company's premises and property is the shared responsibility of all employees. Employee, contractor, and visitor access credentials (badges) should be worn in a conspicuous manner at all times while on company premises.

[Go to Respect Q&As](#)



COMMUNICATION

External Communications

Salesforce has an open and transparent culture, and the [Communications Policy](#) governs how the company communicates to the public responsibly.

Investors and the media

All inquiries from the media must be directed to the Public Relations team. If you have any questions, contact pr@salesforce.com.

Similarly, inquiries from investors or the investment community must always be directed to the Investor Relations team at investor@salesforce.com.

Social media

Remember, the Internet is a public place, so handle yourself accordingly.

- Protect Salesforce's proprietary information.
- Do not comment on legal matters, trade secrets, or disclose confidential information.
- If you are discussing the company or Salesforce products, be open about the fact that you work for the company.
- Be clear that your statements are your own opinion, not those of the company.
- Remember that postings on the Internet live forever.
- Check the [Social Media Policy](#) for more information.

Speaking events

If you are invited to speak or present at an event, notify the Public Relations team before accepting and have them review and approve any materials you present or discuss. Before accepting free travel or accommodations, check that the proposed gift is within the gift rules or ask the Legal Department for approval.

Political Activities

You are encouraged to be involved in the political activities of your choice. Be clear in such activities that your participation is your own choice, not an endorsement from the company. Salesforce will not reimburse you for your personal political contributions.

- Do not use company time or resources for your personal political activities.
- If you are involved in lobbying, make sure you know what the rules are.
- Make sure you know all the laws regarding companies and individuals making political contributions to ensure compliance with disclosure and pay-to-play laws relevant to the company. All company political contributions are subject to the [Global Anti-Corruption Policy](#), and U.S. contributions are subject to the [U.S. Political Contributions Policy](#).

[Go to Communication Q&As](#)



WAIVERS

It is rare for anyone to be exempted from any part of this Code, regardless of seniority or position. Waivers may only be granted in a manner permitted by law, with review and approval by the General Counsel, and, if required under applicable regulations, review and approval by the Board of Directors or a committee of the Board, with public disclosure of any waiver to the extent required by applicable regulations.

MAHALO!

Thank you for reading and following this Code.



PART 2: Q&A

For more information on the Code of Conduct, please see the [Q&As](#).