



Code of Conduct

Blazing Trails. Building Trust.

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A Message from the Chief Executive Officer

Here at Salesforce, we're committed to upholding trust, ethics and integrity in everything we do. This includes treating everyone with respect, driving strong performance, and making decisions that align with our core values. That's why we ask every employee to make a commitment to follow our Code of Conduct.

The Code of Conduct is built on our core values: Trust, Customer Success, Innovation, Equality, and Sustainability. It serves as a clear guide for making ethical decisions, and ensures we stay aligned with what we stand for as a company.

We also have a strict non-retaliation policy, under which all employees should feel confident asking questions or raising concerns if something doesn't seem right, without fear of negative consequences. Speaking up is a shared responsibility and is essential to maintaining our high standards.

Thank you for your commitment to these principles and for contributing to Salesforce's success. Together, we uphold the values that drive our work and build trust with our customers, partners, and communities.

With gratitude,



Marc Benioff
Chair and CEO



A Message from the Chief Legal Officer

Our new Code of Conduct is the cornerstone of our commitment to fostering a high-integrity, ethical culture at the pace of business and maintaining our core value of Trust. The Code of Conduct, and the principles and values it expresses, is fundamental to our success.

At Salesforce, we are all stakeholders of trust and stakeholders of each other. Each one of us plays a crucial role in building and sustaining the confidence and trust of our customers, partners, regulators, and each other. Our new Code of Conduct is designed to inspire, guide, and enable us in making decisions that reflect our core values and ethical principles, ensuring that we act with integrity, honesty, fairness, transparency, and respect in all our interactions, at all times.

The digital, artificial intelligence (AI), and Agentforce transformations we are driving and experiencing bring incredible opportunities for innovation and growth. However, they also present new challenges and ethical considerations. As we embrace this new era, it is more important than ever to uphold the highest standards of integrity and ethical behavior.

Our Code of Conduct is not just a set of rules. It is a reflection of who we are and what we stand for. It is a living document that evolves as we continue to grow and face new opportunities and challenges. I encourage each of you to read it carefully, understand its principles, and apply them in your daily work, interactions, and choices. While it may be difficult to remember hundreds of rules, it's much easier to remember and foster our core values.

Together, we continue to create a workplace where ethical behavior and high-integrity choices are the norm. Thank you for your commitment to upholding these values, thank you for your dedication to our shared success, and thank you for putting trust at the center of all our relationships.

Best regards,

Sebastian V. Niles

Sebastian V. Niles

President and Chief Legal Officer





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Salesforce Values

Our Core Values



Salesforce Values

Salesforce Values

Our five core values – Trust, Customer Success, Innovation, Equality, and Sustainability – create value for our customers and world. Our values guide everything we do as a company and as individuals, from how we work with our stakeholders to how we show up in our communities.



Trust

We build trust through the integrity of our people and our technology, transparency, and ethical leadership. We're dedicated to creating trusted relationships, staying accountable to our stakeholders, listening deeply to our employees, and delivering on our commitments.

Customer Success

Through trusted relationships, we earn the privilege of guiding our customers to achieve extraordinary things. We are our customers' most important and relevant partner, guiding them to success in the ever-evolving digital economy.

Innovation

We innovate together, with new solutions, products, and releases that help our customers connect with their customers in whole new ways and reimagine their business for the world of artificial intelligence (AI), where humans with agents drive success, powered by AI, data, and action. We apply a beginner's mind, creativity, and continuous learning to create visionary products that are easy, integrated, scalable, and global.

Equality

We are all active allies striving to create a more inclusive workplace and advance equality for all. We believe in the fundamental human rights of all people.

Sustainability

We drive systemic change to help every organization achieve net zero carbon emissions and become nature positive. We boldly address the current climate emergency, bringing the full power of Salesforce to accelerate the world's journey to net zero.



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Our Code, Our Responsibilities



About Our Code

At Salesforce, we're as intentional about our culture as we are about our products, and we believe that business is the greatest platform for change. We treat each other well and do right by all our stakeholders. We live our values through the integrity of the actions we take every day.

Our Code of Conduct gives us a road map for living our values and helps us navigate complex situations in a way that builds trust. It's the cornerstone of our ethical culture and the foundation for all of the rest of our policies. While our Code does not address every law or risk, it does provide resources that enable us to make ethical decisions and ask questions, raise concerns, and get more information.

We always follow applicable laws and regulations even if they are stricter than the guidance in our Code. And in some situations, Salesforce may adopt a higher level of standards and measures, beyond what is required by law, because of our commitment to our values and ethical culture.

As a U.S.-headquartered company with employees, operations, customers, and business partners around the world, Salesforce and all its employees are required to comply with certain U.S. laws and regulations that apply not only in the territory of the U.S. but wherever we do business, including at each of our global subsidiaries and ecosystems wherever located. Other countries' laws and regulations may also apply to our local, regional, or global operations as well.

Our Code includes the topics that are especially relevant to building trust with all our stakeholders, including:

- **Our people**
- **Our company and investors**
- **Our customers**
- **Our communities**

Every topic in the Code helps us do our work ethically and with integrity – which is relevant to every stakeholder and to the company's success.

Please note that some links to resources may only work for Salesforce employees.



Our Responsibilities

Our Code applies to everyone at Salesforce, at every level – our employees, officers, and board members of Salesforce, Inc. and its controlled entities, including its subsidiaries.

Salesforce also maintains a [Global Supplier Code of Conduct](#) that sets forth our expectations for our business partners, including our agents, service providers, consultants, suppliers, resellers, and distributors. We act ethically in all business dealings and expect our business partners to do the same. We expect our employees working with our business partners to hold them accountable to that ethical conduct.

It is everyone's responsibility to do the right thing at all times and to help others do the same. We put this into practice by:

- Relying on our values to guide our decisions and actions
- Caring about our colleagues and looking out for them
- Completing all training assigned to us in a timely manner
- Understanding and following our Code and all the policies and procedures that apply to our work, and seeking direction and support for understanding them as needed
- Following guidance and advice provided by our Legal team
- Asking questions and reporting concerns about violations of our Code, policies, or the applicable law
- Fully cooperating with investigations, providing truthful information, and maintaining confidentiality, as permitted by applicable law

Special Responsibilities of People Leaders

Our Code applies to everyone at Salesforce equally, but employees who lead and supervise others have extra responsibilities. We expect People Leaders to promote our ethical culture by modeling our values and setting the right tone with their teams by:

- Leading by example and always choosing to act with integrity
- Speaking up when there is a problem or concern, and encouraging others to do the same
- Making sure all team members understand the Code and what is expected of them
- Creating an environment where team members know how to report concerns and feel safe doing so, without fear of retaliation
- Talking regularly with team members about ethics, integrity, and compliance topics
- Always being open to team members' ideas, questions, concerns, and feedback
- Treating all team members fairly and respectfully
- Directing issues and questions to those who are best able to help
- Properly escalating or reporting any concern that could indicate a violation of our Code or our policies



Leading with Integrity at Salesforce

At Salesforce, integrity starts at the top. Our senior management and executives are expected to lead by example, consistently demonstrating their commitment to ethical behavior. Leaders are expected to send a clear message to everyone at Salesforce that integrity is non-negotiable.

When leaders set the right tone, they create an environment where ethical behavior is the norm. Employees feel empowered and enabled to act with integrity, which builds a strong culture. This enhances our reputation, attracts top talent, and fosters long-term success. We make ethical considerations the foundation of every decision.

As a global company, we are committed to maintaining the highest standards of integrity. You might encounter rationalizations for acting unethically, like:

- *"I didn't know"*
- *"I did it for the company/to advance our business"*
- *"It's just how business is done"*
- *"Our competitors are doing it"*
- *"It's always been done that way"*
- *"The policies don't matter"*

Make no mistake: none of these rationalizations is a valid excuse for unethical action. If you encounter them, speak up. We must all speak up, raise concerns, ask questions, and reinforce the company's commitment to ethical conduct and the principles set forth in our Code of Conduct. At Salesforce, we choose the ethical way – even when it is hard.

Making Good Choices

Making good, ethical decisions may not always be clear-cut. When presented with a complex situation, use these questions to help guide you to the right decision:



Is it legal?



Will it build trust with all of our stakeholders — employees, customers, company, and community?



Would you be comfortable with your decision if it appeared in the news?



Is it consistent with our values, our policies, and our Code?



Does it benefit the company as a whole - not just a certain individual or group?

If you answer 'Yes' to ALL of these questions, proceed with your decision carefully, asking for advice along the way.

If you answer 'No' to any of these questions, stop and don't proceed with your decision. If you are ever uncertain about any aspect of a decision, you can seek help from one or more of these resources:

Our company policies, available in Policyforce

Your manager or another manager you trust

Employee Success (ES) through BaseCamp

The [Global Ethics & Integrity team](#)

The [EthicsPoint reporting line](#)



Consequences of Noncompliance

We hold everyone at Salesforce accountable to the same standards and expectations of conduct, regardless of who they are, their job or role. We apply clear and consistent discipline procedures, in accordance with applicable laws and regulations.

Any violation of the law, this Code, or other Salesforce policies or processes may result in disciplinary action, up to and including termination, in accordance with applicable law. Certain violations may also lead to additional consequences, which may be outside of Salesforce's control or influence, such as fines, criminal prosecution, and even jail time. Violations include any circumvention or attempts to circumvent our rules and controls.

Employees, officers, and directors are not entitled to keep any compensation or benefit that was earned improperly or in connection with any violation of the Code of Conduct or other company policy.

Everyone at Salesforce is expected to read, understand, and comply with this Code and the policies that apply to their role and take any required training. Salesforce employees receive the Code when they are hired and acknowledge that they have read and understood it when being onboarded and subsequently each year. Lack of awareness of the Code or other policies does not exempt anyone from responsibility for compliance or excuse misconduct.

Waivers and Modifications

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 Chief Legal Officer or 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 laws and regulations.

Salesforce reserves the right to modify this Code at any time. Certain changes to the Code must be approved by the Salesforce board of directors and publicly disclosed, in accordance with applicable laws and regulations.



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Speaking Up



Raising Concerns and Questions

At Salesforce we strive to create an environment where people feel comfortable raising questions, reporting concerns, and seeking help.

If you are ever unsure of how to handle something or have a concern about potential misconduct, policy violations, or illegal activity, it is important that you speak up. If you experience, believe you have experienced, witness, or hear about discrimination, harassment, bullying, retaliation, or any other conduct that violates this Code of Conduct, other Salesforce policies, or the law, you have a duty to raise this.

Remember: Salesforce depends on its people to raise concerns and questions in order to take appropriate action. The company can't address a concern that it does not know about.

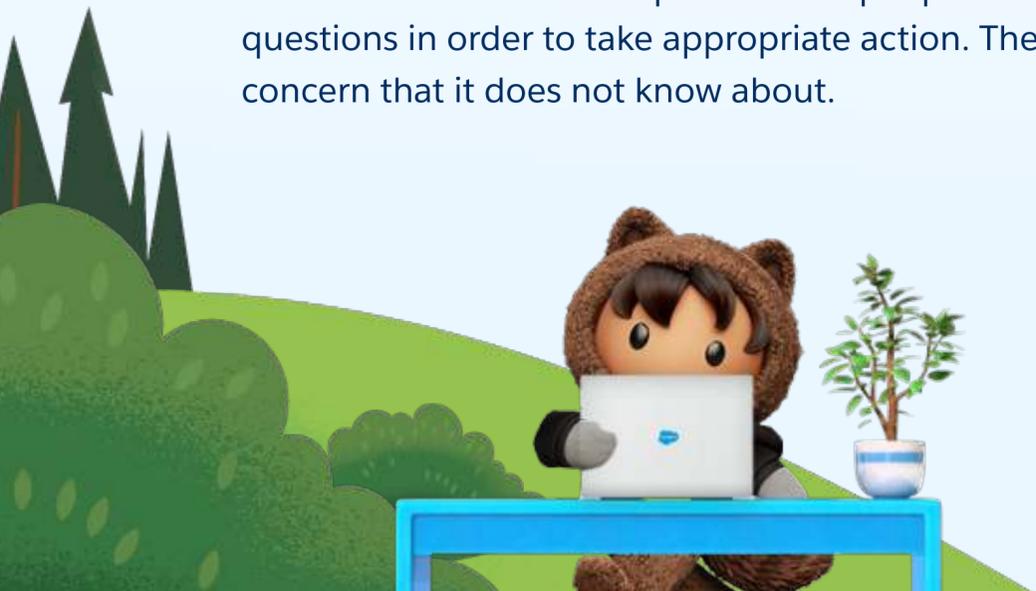
If you have questions or want to raise a concern, it's easy to speak up using one of these resources:

- The [EthicsPoint](#) reporting line
- Employee Success (ES) through BaseCamp
- The [Global Ethics & Integrity team](#)
- Your manager or another manager you trust

[EthicsPoint](#) is our confidential reporting line, operated by an independent third party engaged by Salesforce. It is available 24 hours a day, seven days a week, and every day of the year, in multiple languages. Reports can be made online or via telephone (refer to the link for details on the toll-free telephone numbers). While we encourage you to identify yourself when making a report, you have the option of remaining anonymous, where permitted by local law.

- When reporting concerns to [EthicsPoint](#), you will be given a case number and a special access code (called a report key). You can use the report key to check the status of your report and provide additional details and follow-up information.

In addition, some locations have whistleblower legislation that requires particular processes. See the Location-specific Whistleblower Guidance for more information. Please note that nothing in this Code should be construed as limiting or preventing your ability to report wrongdoing to any government agencies.



What Happens When I Raise a Concern?

1 Your report will be reviewed to determine if an investigation is warranted.

2 If warranted, qualified personnel will be assigned to conduct the investigation.

3 If you provide your name, Salesforce will take reasonable steps to keep your identity confidential. The information in your report will only be shared on a need-to-know basis.

4 We expect everyone involved in the investigation process to cooperate respectfully, fully and honestly, without trying to control or influence the investigation in any manner.

5 If misconduct is confirmed, the appropriate business leaders will take corrective or disciplinary action, up to and including termination of employment, in accordance with local laws and regulations.

If you are contacted to participate in a company investigation, you have a duty to cooperate, tell the truth, and maintain appropriate confidentiality.

Zero Tolerance for Retaliation

Salesforce does not tolerate retaliation of any kind against anyone who makes a report in good faith or who participates in an investigation. A good-faith report means that you genuinely believe that the concern you are raising is real. Retaliation is prohibited, is itself a violation of our Code, and when substantiated will result in disciplinary action.

If you witness retaliation or believe you've been retaliated against, please log a ticket with Employee Success (ES) through BaseCamp so it can be duly investigated.

Retaliation refers to taking any action to either punish someone for, or to prevent someone from, making a report or participating in an investigation. Examples of retaliation include:

- Adverse employment actions
- Threats, harassment, or bullying
- Exclusion from certain projects or social activities

Resources



- [Employee Handbook – Anti-Retaliation Policy](#)
- [Employee Handbook – Open Door Policy](#)
- [Employee Handbook – Reporting Concerns](#)
- [Location-specific Whistleblower Guidance](#)



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Building Trust with Our People



Embracing and Advancing Equality

Where We're Going

At Salesforce, we believe in equality for all. We make all of our employment decisions based on merit and fair treatment and provide all employees and applicants with access to all of our roles, benefits and programs.

Why It Matters

Hiring people with different life experiences makes Salesforce a more creative and innovative company. We can make better business decisions and address more challenges with the knowledge of many different opinions, backgrounds, and cultures.

How We Get There

We embrace equality by:

- Sharing information with and seeking input from all of our employees
- Listening to all points of view with courtesy and respect
- Providing proper accommodations to employees that need them
- Making all employment decisions for current or prospective employees based on merit and fair treatment

Integrity in Action

Q One of the candidates for an open position is highly qualified, but they have a disability. I'm worried about how they will fit into the team and what accommodations they would need. Can I consider this in my hiring decision?

A Your job as a manager is to determine if they are qualified for the role. Our accommodations team will then work with you to determine the requirements of the role and whether we can provide a reasonable accommodation specific to the disability. In the majority of cases we can make adjustments that will allow any qualified person with a disability to do the role.

Resources



- [Employee Handbook – Equal Opportunity Employment](#)



Preventing Harassment and Discrimination

Where We're Going

Everyone deserves to be treated with dignity and respect. Illegal harassment, bullying, or discrimination is never tolerated at Salesforce.

Why It Matters

How we treat each other is an expression of our values. We are all responsible for preventing illegal discrimination, harassment, and any other kind of improper conduct, so that Salesforce is a safe and productive environment where all of us can do our best work. This applies to anyone who does business or interacts with Salesforce and to all locations where we operate.

How We Get There

We prevent illegal harassment, bullying, and discrimination by:

- Treating others with the utmost dignity and respect
- Never making employment decisions based on any protected characteristic
- Speaking up if we witness inappropriate conduct
- Addressing any improper conduct, including a joke or even a compliment, that makes someone uncomfortable, before it rises to the level of illegal harassment, bullying, or discrimination

What You Need to Know

Protected characteristics are any personal characteristics that are protected by law. These can vary by local law, but often include:

- Race
- Color
- Religion
- Caste
- Sex
- National origin or ancestry
- Age
- Medical condition or disability
- Veteran status
- Marital status
- Pregnancy
- Sexual orientation
- Gender identity or expression

The definitions of **illegal harassment** and **discrimination** differ around the world, but they generally include any conduct – verbal, nonverbal, written, or otherwise – relating to a person’s protected characteristics that creates an unwelcome, intimidating, hostile, or offensive work environment for that person. That can range from offensive jokes or comments to slurs, name-calling or exclusion. Sexual harassment includes unwanted sexual advances, suggestive comments, offers of benefits in exchange for sexual favors, or inappropriate touching. Bullying is broadly defined as inappropriate workplace behavior that may or may not be linked to protected characteristics.

Integrity in Action

Q

Recently, after a meeting, I overheard two co-workers joking about another member of our team. Their conversation included references to the person’s ethnicity. Although the person they were talking about was not present and probably does not know about the exchange, I am concerned about the situation. What should I do?

A

You should report it. This conversation was offensive and violated Salesforce’s commitment to personal dignity and respect. Behavior like this can create a hostile work environment, even if it wasn’t directed at the employee who overheard it. Your report will be taken seriously and handled as confidentially as possible.

Resources



- [Employee Handbook – Harassment and Discrimination Free Workplace](#)
- [Slack Engagement Policy](#)



Keeping Workplaces Safe, Healthy, and Secure

Where We're Going

We are committed to the safety, health, and security of all our employees, contractors, and guests.

Why It Matters

Nothing is more important than keeping people safe. A workplace free from physical and psychological hazards, weapons, and violent acts protects employees and supports a sustainable high-performance culture.

How We Get There

We keep our workplaces safe, healthy, and secure by:

- Following all safety standards and guidance of our Health and Safety Management System
- Reporting safety hazards, security threats, psychological safety concerns (e.g., threats, bullying), and incidents
- Ensuring the health and safety of our contractors is protected and in compliance with the Salesforce Contractor Safety Standard
- Never bringing drugs or alcohol to work, using them at work, or working under their influence, except in the scenarios outlined by the Alcohol and Drugs in the Workplace Policy
- Promptly addressing concerns regarding both physical safety and psychological safety risks in the workplace
- Keeping the workplace free from violence, threats, and the use or possession of weapons
- Contacting the local first responders or law enforcement for life-threatening safety or security incidents and threats of imminent self-harm
- Wearing badges in a conspicuous manner at all times and ensuring guests and contractors do the same

Resources



- [Employee Handbook – Alcohol and Drugs in the Workplace](#)
- [Health and Safety Policy](#)
- [Salesforce Contractor Safety Standard](#)
- [Violence Free Workplace](#)

Staying Compliant from Anywhere

Where We're Going

Whether we work in the office, from home, or while traveling, we are careful in how we use company time and resources.

Why It Matters

The modern workplace continues to evolve, and we pride ourselves on our ability to adapt. Whether working in one of our workplaces, at a customer site, or remotely, our high expectations of workplace behavior remain the same.

How We Get There

We stay compliant by:

- Using company time wisely and respecting others' time
- Getting proper manager approval for any changes to work schedules, locations, or arrangements
- Conducting ourselves appropriately and in the same professional manner in and out of the office
- Following our policies and Code no matter where or when we work
- Protecting and properly using Salesforce assets, equipment, and information

Integrity in Action

Q I typically work from home and often travel for work. I don't always have a dedicated place to work at home and sometimes have to take important business calls while traveling. Do I need to take any special precaution when working outside a Salesforce office?

A It's important to properly handle and protect confidential information at all times. That includes ensuring that confidential information is not left, stored (physically or digitally), or overheard in spaces accessible to individuals who do not have authority to view or access it, including other individuals who may live with you. In addition, similar care and discretion should be used when on phone or video calls at all places, including during travel or while working out of the office. For example, use privacy screens on your laptop, lock your laptop when not in use, avoid mentioning confidential information when in public spaces, and take other measures to keep Salesforce's and customers' confidential information secure.

Resources



- Information Security Policy



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Building Trust with Our Customers



Preventing Bribery and Corruption

Where We're Going

We win business on the strength of our solutions and by building relationships based on integrity and trust. We never resort to bribery or other corrupt practices in pursuit of business.

Why It Matters

We conduct our business ethically and free of bribery and corruption. Bribery undermines fairness, transparency, and trust in both the public and private sectors. It is illegal in every jurisdiction in which Salesforce does business, and its consequences are severe, potentially including fines and jail sentences.

We live our values by following all applicable laws and refuse to engage in corrupt activities, even if it carries a cost or we lose a business opportunity. No amount of profit is worth the sacrifice of our values, and pursuing success is never at the expense of our integrity.

How We Get There

We prevent bribery and corruption by:

- Never offering, promising, authorizing, giving, providing, soliciting, accepting, or receiving a bribe, kickback, or anything of value – directly or indirectly – to or from Government Personnel or others, to gain an improper business advantage
- Never engaging in facilitation payments, even where it may be legally acceptable
- Keeping accurate and complete records that truthfully represent all financial transactions
- Only doing business with third parties who share our commitment to integrity and ethical business practices
- Never using an agent, consultant, reseller, supplier, nonprofit organization, or any other third party to make any improper payments on our behalf – remember that anything we can't do directly, we also can't do indirectly (through a third party)
- Avoiding undisclosed arrangements with any stakeholders, needlessly complicated transactions, or hidden terms and conditions
- Contacting the [Global Ethics & Integrity team](#) when we need guidance

What You Need to Know

Below are some important definitions to help you understand bribery and corruption.

Bribery is the act of offering, promising, authorizing, giving, providing, soliciting, accepting, or receiving anything of value, directly or indirectly, to or from an individual or entity, in order to improperly induce, influence, or reward the actions or decisions of someone, to gain an improper business advantage, or to improperly obtain or retain business.

Anything of value is anything that has a value to the recipient (including their family members), or that would represent an advantage or could be exchanged for an advantage, financial or otherwise, directly or indirectly, to the recipient or their family members. Examples include:

- Cash
- Cash equivalents (money orders, gift cards, vouchers and certificates, securities, etc.)
- Gifts, entertainment, or meals
- Travel, transportation, or lodging
- Charitable contributions
- Political contributions
- In-kind services
- Offers of employment or internship
- A chance to win anything of value

A **kickback** is giving back some amount of money paid (or due to be paid) as a reward for a business arrangement. Accepting, soliciting, offering, promising, authorizing, or giving a kickback is a violation of our Code.

Government Personnel includes employees at any level of government (e.g., national, regional, or local), political appointees, elected officials, candidates for political office, members of a royal family, and employees of a Government Entity (including public international organizations like the International Monetary Fund, United Nations, or World Bank) or a Government-owned Entity.

A **facilitation payment** is a tip or small payment to Government Personnel to expedite or secure a routine, non-discretionary government action, to which the payer would be entitled ordinarily. Such actions typically include issuing a permit or providing utility service. This is illegal in most countries and is always prohibited at Salesforce, per our Global Anti-Corruption Policy.

Integrity in Action

Q I am working in a country that has a lot of potential. A local consultant has advised me that to win an important government contract, we will need to show “goodwill” by contributing to a local charity run by a key official’s spouse. What should I do?

A Report this to [EthicsPoint](#) immediately. Charitable contributions can sometimes be a legitimate business activity. But they can also be a channel or conduit for bribery – even when the charity itself is legitimate and works for a good cause. The connection to the public official and the circumstances of the request are suspicious and could indicate a request for a bribe. You should find a different local consultant more in tune with our commitment to doing business with integrity.

Q A partner offers to pay you 5% of the payments they receive from an implementation project with a customer if you recommend them to the customer and the partner successfully lands the contract. They suggest calling the payments “consulting fees” and explain that your referral is just a side business.

A Promptly, assertively, and explicitly reject the offer and report it to [EthicsPoint](#) immediately. The requested exchange would be a kickback. A kickback is highly improper and would be considered both a conflict of interest and a violation of our Code of Conduct. It may also be illegal. How you respond in a situation like this is very important. Not being prompt, assertive, and explicit in rejecting the offer could give an impression that the request is under consideration, or be interpreted as a promise to participate in the misconduct, which could be very problematic for you and the company.

Q A customer has indicated that they may renew their contract with Salesforce if we begin working with a new third party and pay them a signing bonus. This third party appears to have ties to the family of our customer contact. What should I do?

A Do not proceed in engaging that third party and report this situation promptly to [EthicsPoint](#). This request could be considered a bribe, hidden as a payment to the third party, which is prohibited under the Code of Conduct and may be illegal.

Q We need to hire a consultant to provide us advice on the public procurement process for upcoming projects. What are some of the key aspects to be mindful of?

A Please ensure that consultants are engaged for legitimate purposes that are documented in the contract, and that there is a valid work product that is being provided in writing. These consultants will need to be run through the procurement process. Keep lobbying requirements in mind and inform the [Government Affairs team](#).

Resources 

- [Global Anti-Corruption Policy](#)

Handling Gifts and Entertainment

Where We're Going

Giving or receiving appropriate business gifts and entertainment can help us build and strengthen business relationships with our stakeholders. However, gifts and entertainment must be undertaken with care. Improper gifts and entertainment present a serious risk to the company and to those with whom we do business. We never offer or accept anything to obtain any improper advantage, nor can we offer or accept anything that could improperly influence or reward an action or a business decision.

Why It Matters

We sometimes offer or accept gifts and entertainment to or from our stakeholders as a token of esteem and appreciation. However, giving or receiving these gifts can present ethical and legal concerns to all parties involved. To protect our reputation and our stakeholders' trust, it is important that we never offer, promise, authorize, give, provide, solicit, accept, or receive anything that could create real or perceived biases or conflicts of interest, improperly influence or reward actions or business decisions, or constitute a bribe.



How We Get There

We handle gifts and entertainment responsibly by:

- Ensuring that gifts and entertainment are infrequent, reasonable in amount, transparent in nature, in line with Salesforce values, and will not embarrass Salesforce if publicly disclosed
- Being mindful of what is legal and appropriate in the different locations and cultures where we do business
- Considering key factors related to gifts and entertainment, including permitted gift types, allowed monetary thresholds, and approval procedures, as established by the Global Gifts and Entertainment Policy
- Never soliciting gifts or entertainment for personal benefit
- Never soliciting or accepting gifts or entertainment from third parties in return for directing business to a particular organization
- Never using personal funds to provide gifts or entertainment on behalf of the company
- Taking special care if solicited for gifts or entertainment, which can result in actual or perceived bias, impropriety, or illegality
- Never using a consultant, reseller, supplier, nonprofit organization, or any other third party to offer gifts or entertainment that would not be appropriate for us to offer directly

- Understanding the restrictions that may apply and always complying with Salesforce policy with respect to gifts and entertainment involving Public Sector Customers, as they are often subject to specific and strict requirements related to gifts and entertainment
- Obtaining pre-approval from the Global Ethics & Integrity team, through the GEM app, before offering, promising, authorizing, giving, or providing any gifts or entertainment to Government Personnel, regardless of value or type, except otherwise noted in the Global Gifts and Entertainment Policy
- Never offering, promising, authorizing, giving, or providing any gifts or entertainment to someone with the intention to benefit Government Personnel, or to evade the pre-approval requirements established by the Global Gifts and Entertainment Policy
- Consulting your manager or the Global Ethics & Integrity team if you are not sure what is appropriate or allowed

What You Need to Know

Gifts and entertainment, as noted in this Code, is a nomenclature that refers collectively to gifts, entertainment, meals, travel and transportation, lodging and hospitality, or more broadly to anything of value. They can be an appropriate way to build and strengthen business relationships, as a token of esteem and appreciation. Gifts and entertainment should only be used for a legitimate business purpose, creating an environment for discussing business, with the promotion, demonstration, or explanation of Salesforce products and services.

Gifts and entertainment should not be (or appear to be) excessive, extravagant, or lavish. They should not create an appearance of impropriety or a sense of obligation or expectation.

Integrity in Action

Q I want to take a customer out for dinner but am unsure how much it will cost per person. What should I do?

A Please determine whether GEM approval is required prior to the dinner by assessing if the customer is a [Public Sector Customer](#), along with assessing the value of the proposed dinner to determine thresholds. We always recommend choosing moderately priced restaurants and checking menu prices in advance. You may also want to set expectations with your customer to avoid surprises during the meal. It's also important to check whether your customer contact is authorized, per their employer's policies, to accept that dinner. If the dinner value is above the monetary threshold established by the Global Gifts and Entertainment Policy, or if you are uncertain about it, please submit a request using our GEM app, seeking proper prior approval.

Q A supplier has invited me to attend a sporting event at their suite, with food and drinks available. Can I accept this entertainment?

A Assess the value of the overall hospitality being offered to you (game ticket, food, beverages, etc.). If it is beyond the threshold established by the Global Gifts and Entertainment Policy, submit a request using our GEM app for proper review. Please note that a supplier's offer of gifts or entertainment can appear as an attempt to influence a business decision, particularly if you are a decision maker on a pending deal or purchase, including renewal deals. Salesforce's Global Supplier Code of Conduct also includes specific governance about gifts and entertainment exchanged with suppliers and business partners, especially during a supplier-selection process.

Q Over years of working with the government official who oversees one of our contracts, we have developed a friendship. The official recently had a child, and I would like to send a small gift to recognize this milestone. However, our contract is currently under review, and I'm concerned about how this could look. May I send a gift?

A You must obtain approval from the Global Ethics & Integrity team, through the GEM app, before offering or giving gifts, entertainment, meals, or anything of value to a [Public Sector Customer](#). That applies regardless of the value, and even if there is a personal motivation for doing so unrelated to our business. Government officials are subject to strict regulations and sending a gift during a contract review could appear to be a bribe. The Global Ethics & Integrity team will review your request and help determine if there is an appropriate way to extend your goodwill in this circumstance.

Resources



- [GEM app](#)
- [Global Anti-Corruption Policy](#)
- [Global Gifts and Entertainment Policy](#)
- [Global Supplier Code of Conduct](#)
- [Partner SPIFFs, Bonuses, Gifts and Other Incentives](#)

Working with the Public Sector

Where We're Going

We are privileged to have relationships with Public Sector Customers and public policy partners around the world. Strict laws and regulations govern our interactions with these customers and individuals. We embrace the special responsibilities of these relationships.

Why It Matters

Public Sector Customers spend public funds when they enter into contracts. This means that both they and the companies they do business with are subject to heightened legal and ethical requirements. We earn trust by showing that we understand and respect these requirements. Not following these requirements could lead to contract termination, criminal and civil penalties, and suspension or debarment from government contracting.

How We Get There

We work ethically with the Public Sector by:

- Taking special care when doing business with Public Sector Customers and public policy partners, as these interactions are often subject to specific and strict requirements
- Understanding and complying with the governmental restrictions that may apply
- Always complying with Salesforce policy and applicable laws related to interacting with Public Sector Customers and public policy partners
- Obtaining pre-approval from the Global Ethics & Integrity team, through the GEM app, before offering, promising, authorizing, giving, or providing any gifts or entertainment to Government Personnel, regardless of value or type, except otherwise noted in the Global Gifts and Entertainment Policy
- Never offering, promising, authorizing, giving, or providing any gifts or entertainment to someone with the intention to benefit Government Personnel, or to evade the pre-approval requirements established by the Global Gifts and Entertainment Policy
- Being mindful that Public Sector Customers may have maximum thresholds applicable for receiving gifts and entertainment, and may need to disclose and record such instances in their entity's records
- Following all government procurement and lobbying disclosure requirements
- Making sure all our communications with and submissions to Public Sector Customers and public policy partners are transparent and accurate

The Global Public Sector Addendum to the Code of Conduct covers the unique legal, ethical, and other requirements that apply to Salesforce's interactions with Public Sector Customers. All employees who support Public Sector Customers must understand and follow the policies outlined in that Addendum. If you are unsure whether you are doing business with a Public Sector Customer, contact the [Public Sector Ethics team](#) for guidance.

What You Need to Know

Public Sector Customers include Government Entities, Government-owned Entities, and Government Personnel, defined below. Public Sector Customers include not only our customers, but also prospective customers and business partners. For the latest version of these definitions, please consult the Global Public Sector Addendum to the Code of Conduct.

- **Government Entity** means any national, state, provincial, municipal, local, First Nations, or Native American governmental organization, including any department, agency, ministry, instrumentality, or branch of such organizations, as well as public international organizations like the International Monetary Fund, the United Nations, and the World Bank.
- **Government-owned Entity** means organizations owned or controlled by a Government Entity. Examples include:
 - Companies that are owned (30% ownership or more), controlled, or funded by a Government Entity
 - Companies that perform government functions on behalf of government (also known as “State-Owned Enterprises” or “SOEs”), such as a public school or university, public hospital, state-owned oil company, bank, airline, energy, water and other utility, customs agency, or sovereign wealth fund
 - Companies owned or controlled by a royal family or, if outside of the U.S., a political party
- **Government Personnel** includes employees at any level of government (e.g., national, regional, or local), political appointees, elected officials, candidates for political office, members of a royal family, and employees of a Government Entity (including public international organizations like the International Monetary Fund, United Nations, or World Bank) or a Government-owned Entity.

Lobbying and Political Compliance

Communications with some Government Personnel that attempt to influence their decision-making may trigger lobbying compliance requirements for Salesforce and individual employees such as registration and disclosure filings. This includes decisions on legislative actions and, in some places, sales and business development activities. Our Global Lobbying Compliance Program allows us to collect and review our employees' interactions with Government Personnel to meet applicable legal requirements.



Integrity in Action

Q I am considering hiring someone for an open position who formerly worked for a Public Sector Customer. Does this present any concerns?

A Yes. Former Government Personnel may face restrictions as to which companies they can work for and what types of work they can do. For example, they may not be permitted to sell Salesforce products or services to their former employer for years after leaving public service. Unless you have received specialized training as a member of our Recruiting team, [contact the Public Sector Ethics team](#) before discussing Salesforce employment opportunities with current or former Government Personnel.

Q I am a Public Sector Account Executive who will be meeting with a state Chief Information Officer to discuss adding a net new Salesforce product to their customer agreement. Do I need to worry about lobbying?

A Yes. In some jurisdictions, the definition of “lobbying” covers attempts to influence the award of a government contract outside of a formal procurement process. You should disclose this meeting on the applicable lobbying questionnaire. If you are not in a lobbying compliance program and do not receive a questionnaire, you should [contact the Lobbying Compliance team](#) for guidance.

Resources



- [Global Anti-Corruption Policy](#)
- [Global Corporate Lobbying Compliance Guideline](#)
- [Global Gifts and Entertainment Policy](#)
- [Global Public Sector Addendum to the Code of Conduct](#)
- [Org62 Government Entity Field FAQ](#)
- [Procurement Lobbying Defined](#)
- [Public Sector Courtesy Standard](#)
- [Public Sector Customers Defined](#)
- [Public Sector Gifting Guideline](#)

Working with Business Partners

Where We're Going

Our relationships with business partners such as agents, consultants, suppliers, resellers, and distributors help us serve customers around the world. Their actions reflect on us and have impact on the world. As a result, we only work with business partners who will uphold our values.

Why It Matters

Our relationships with business partners are important to our work. We must be able to trust that these partners are committed to doing business our way – fairly and with integrity. We can be held liable for the misconduct of our business partners and suppliers, even if we aren't aware of the misconduct.

How We Get There

We ensure our business partners share our values by:

- Only working with those who have passed a risk-based due diligence process (including risk-based legal due diligence for resellers, consulting partners, and strategic partners), and who meet our engagement requirements
- Only doing business with business partners who share our commitment to integrity and ethical business practices
- Never using a business partner to do anything that our policies or the law does not allow us to do directly
- Avoiding even the appearance of conflicts of interest in our business partnerships
- Never soliciting or accepting anything of value from a business partner in return for retaining business or directing business to a particular organization
- Choosing and evaluating all business partners based on clear and objective measures such as quality, service, price, and availability
- Reporting to EthicsPoint any good-faith concerns of third-party misconduct

Integrity in Action

Q In the course of a supplier engagement, I noticed that a set of government permits that typically takes several weeks to be approved was approved in a matter of days. This supplier is known to be well-connected with various government agencies and officials. I'm concerned that the supplier may be providing some incentive to get the permits approved quickly. Should I report my concerns?

A Yes. Regardless of whether the supplier is engaging in misconduct or not, you should report this concern to your manager or [EthicsPoint](#). Salesforce and individual employees can be held liable for the actions of our third parties. Reporting helps protect you and the company.

Q I am working with a reseller who requested a very high discount for a Public Sector deal that goes beyond what is considered standard in that region. The reseller says the steep discount is necessary to get the deal done. However, there are no competing suppliers and there appears to be no other clear business justification for the discount. I have also heard rumors about personal connections between the reseller and the Public Sector end customer. What should I do?

A Unjustified discounts can create slush funds from which bribes and kickbacks, which are illegal, can be paid. You should immediately contact the [Global Ethics & Integrity team](#) for guidance. They will review the facts and advise on how to proceed in a way that protects Salesforce and, if possible, allows the deal to safely proceed.

Resources



[Customer/Partner Awareness Policy](#)

[Global Anti-Corruption Policy](#)

[Global Purchasing Policy](#)



Competing Fairly

Where We're Going

We compete for and win business through ethical and honest practices in the marketplace. We collect information about our competitors through legitimate sources and never try to restrain free and fair trade.

Why It Matters

Competition laws (also known as antitrust laws in the U.S.) help ensure a level playing field for all businesses. These laws prohibit agreements that would lessen competition or restrain trade. By complying with competition laws, we do our part to support fair competition. Failure to comply with applicable competition laws is a violation of Salesforce's Global Antitrust Policy and can also have serious legal consequences.

How We Get There

We compete fairly by:

- Never discussing or reaching agreements with competitors on pricing, bidding, or allocation of customers or markets
- Never exchanging competitively sensitive information with our competitors
- Never reaching improper agreements or understandings with other companies to refrain from hiring or recruiting each other's employees (sometimes referred to as "no-poach" agreements)
- Never dictating the prices at which Salesforce business partners must sell to end customers
- Never agreeing to any suggestions by competitors to enter into agreements or arrangements that may restrain competition and promptly reporting such incidents to the [Salesforce Antitrust Legal team](#)
- Never gathering information about our competitors, directly or indirectly, through manipulative or deceptive means

In addition, it's important that we communicate with care, both internally and externally, so as not to create the misimpression that Salesforce engages in any kind of anticompetitive or abusive behavior, acts dishonestly or in bad faith, or dominates any potential market. All such practices create potential legal concerns for Salesforce.

What You Need to Know

Examples of activities that could violate competition laws include:

Dividing or allocating markets, where competitors agree to limit their sales activities related to particular territories or customers in a way that allocates customers or markets between them

Price fixing, where competitors agree to charge particular prices for certain products or services

Agreements among companies not to hire or recruit their respective employees

Boycotting, where competitors agree to avoid dealing with a particular customer or supplier

Bid rigging, where competitors agree among themselves to bid in a way that allows a certain bidder to win

Keep in mind that “agreements” do not have to be signed contracts or otherwise memorialized in writing to be problematic. An informal written or oral understanding with a competitor, or even a conversation that implies an understanding, can 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 [Salesforce Antitrust Legal team](#).

Important note: A Salesforce partner, such as a reseller or a system integrator, can also be a competitor to Salesforce in certain situations. In these situations, it is important for the Salesforce team competing against the partner to treat the partner as a competitor.

Integrity in Action

Q I am an Account Executive and my counterpart at another CRM company reached out to propose that we share with each other information about upcoming customer opportunities, so that we can decide who should pursue which ones so we don't go after the same opportunities. Should I agree to my counterpart's proposal?

A No. This scenario describes an invitation by your counterpart to engage in market allocation, which is illegal under competition laws, can be prosecuted criminally, and is strictly prohibited under Salesforce's Global Antitrust Policy. It is also generally inappropriate under competition laws to share competitively sensitive information – which can include information about customer opportunities – with a competitor.

Resources



[Global Antitrust Policy](#)

Doing Business Honestly

Where We're Going

We do business with the utmost integrity and communicate honestly with our stakeholders.

Why It Matters

Being clear and candid about the genuine value of our products and services builds trust with our stakeholders and keeps our reputation strong.

How We Get There

We do business honestly by:

- Describing and representing our products and services and the capabilities of our channel network honestly and not making commitments we know we cannot meet
- Understanding the needs of our customers and offering solutions and information aligned with those needs
- Complying with applicable legal requirements when interacting with procurement officials and participating in public tenders, not drafting technical specifications so as to improperly favor Salesforce in a public tender, and never submitting false information in response to an opportunity or tender
- Never doing anything illegal, dishonest, or lacking integrity to win or keep business
- Maintaining accurate sales and other business records, including, but not limited to, accurate records of all negotiations and agreements



Integrity in Action

Q I'm an Account Executive and a customer contacted me about exchanging unused subscriptions from one product to another. They seem to be unaware of the swap rights in their contract. Should I inform the customer of their swap rights and let them exchange products, or should I charge the customer for new product subscriptions, to earn more ACV?

A You should act with integrity and inform the customer about their contractual right to swap subscriptions. Salesforce only wants business earned the right way.

Q My customer requires specific product functionality for their use case and asked a detailed question about it on the last day of the quarter, prior to closing the deal. I'm not 100% sure that the product does what the customer needs. Should I assure the customer that the product includes the required functionality, in order to close the deal within the quarter?

A No. You should verify whether the product meets the customer's needs and avoid any misrepresentation of the product's functionality, regardless of the potential impact on the deal and its timing.

Q I'm coming up with new advertising strategies for one of our products. I had a great idea for a tagline that I think will resonate with our customers. Can I start using the tagline in correspondence with potential customers?

A You must seek approval for all new marketing language so that it can be reviewed for accuracy and properness. We take our commitment to our customers seriously and ensure that we represent our products honestly and transparently.

Resources



- [Employee Handbook](#)
- [Global Anti-Fraud Policy](#)
- [Global Travel and Expense Policy](#)

Conducting Global Trade with Integrity

Where We're Going

Salesforce is committed to following all international trade laws that govern our business worldwide. These include export control, economic sanctions, anti-boycott, and customs laws and regulations.

Why It Matters

International trade laws affect how we sell and export our products and services around the world. As a U.S.-headquartered company, Salesforce and all its employees must comply with U.S. sanctions, export control laws, and regulations in our operations around the world, including at each of our global subsidiaries. Other countries' laws and regulations may apply to our regional or global operations as well. These laws are complex and vary across jurisdictions. Violations can mean large penalties for Salesforce. Understanding and following these laws helps protect our reputation and the future of our global business.

How We Get There

We conduct global trade with integrity by:

- Knowing and following the export control rules, classification procedures, and reporting requirements that apply to selling our software and services around the world
- Screening customers and business partners to identify sanctioned or restricted parties
- Implementing controls to prevent access from embargoed territories
- Reviewing red flags that may indicate a prohibited transaction
- Implementing controls on international shipments
- Alerting the [Global Trade team](#) about any possible trade compliance concerns, including any concern that a transaction may involve a prohibited party, end-use, or territory, and any request to participate in an international boycott



Integrity in Action

Q I'm working on a project with a Salesforce partner, and the partner asked me to share a software development kit (SDK) with them that needs to be downloaded in a few countries. The partner is not a denied or restricted party. Are there any global trade restrictions to consider?

A Potentially. The download of an SDK can be considered an export. While Salesforce makes use of export control licenses to distribute our products around the world, we must be careful when sharing source code, object code, downloadable components, or technical documents – including those containing information about encryption – in the course of our operations. Salesforce has an export control program designed to ensure export compliance for our generally available products, but special requests or circumstances should be communicated to the Global Trade team for consideration. In this case, the Global Trade team can help identify the Export Control Classification Number (ECCN) of the SDK and whether there are any restrictions on exporting to the partner.

Resources



- [Customer/Partner Awareness Policy](#)
- [Global Trade Policy](#)
- [Global Trade Resources Page](#)
- [Global Trade Training Video](#)



Using Technology Wisely and Ethically

Where We're Going

When we use powerful new tools such as Artificial Intelligence (AI) and other emerging technologies, we do so carefully and with integrity. We also work to identify risks and help our customers and business partners use our products ethically.

Why It Matters

We know how quickly technology evolves. Technologies such as AI can help make us more productive and creative, but their use can also raise ethical concerns. We are committed to the responsible use of AI and technology in general, and we hold our customers and business partners to the same standards in their use of our products.

How We Get There

We use technology wisely and ethically by:

- Only using AI for internal tasks and projects if we have explicit approval to do so, as outlined in the policies and other documents governing the use of AI at Salesforce
- Complying with our internal policies when using third-party AI, or Salesforce products or functionalities with AI
- Protecting data privacy and intellectual property when using technology, including AI tools
- Carefully reviewing AI-generated content for accuracy and appropriateness before using it



What You Need to Know

Risk identification is a crucial part of ensuring that our products are not used in prohibited ways. Risks posed by customer or partner activity require subject matter expert evaluation and may lead to account suspension, service limitations, or onboarding denial for prospective customers.

Improper Use by Customers

Promptly report any concerns regarding the potential improper use of our products, including disallowed AI product usage, by existing or prospective customers or partners (including resellers, AppExchange (ISV) partners, and consulting partners) to the [AUP Compliance team](#).

Improper Use by Employees

For issues related to the potential improper use of our products by employees, including but not limited to AI products, please report concerns to [EthicsPoint](#).

Resources



- [Acceptable Use and External-Facing Services Policy](#)
- [Customer/Partner Awareness Policy](#)
- [Ethical Guidelines for Generative AI](#)
- [Internal AI Acceptable Use Policy](#)



Protecting Customer Confidential Information

Where We're Going

We treat all Customer Confidential Information with the utmost integrity and handle it in compliance with our contractual commitments and data protection laws.

Why It Matters

Protecting the security and privacy of Customer Confidential Information strengthens customer trust in Salesforce. We comply with the many laws and regulations that apply to the collection, storage, use, transfer, and disposal of Customer Data and always respect the confidential information of our customers.

How We Get There

We protect Customer Confidential Information by:

- Respecting customer instructions regarding the processing, security, and confidentiality of Customer Confidential Information
- Never disclosing Customer Confidential Information to anyone outside of Salesforce without the approval of the [Salesforce Legal team](#)
- Using Customer Confidential Information only as needed to provide services to our customers and sharing it only with those who have permission to view it
- Understanding and following all the data protection and privacy laws that apply to our work in different countries, as well as the two Salesforce's Processor Binding Rules approved by European Union and United Kingdom data protection authorities
- Reporting any suspected or confirmed security incidents to the [Information Security team](#)



What You Need to Know

Customer Confidential Information includes all information disclosed by a customer to Salesforce, whether orally or in writing, that is designated as confidential or that reasonably should be understood to be confidential given the nature of the information and the circumstances of disclosure. Customer Confidential Information includes Customer Data.

Customer Data includes all information and data that customers and their users submit to Salesforce or that are submitted on behalf of customers through Salesforce services or applications, such as contacts, account information, marketing data, health data, and any other information that a customer processes or stores on Salesforce services.

Integrity in Action

Q While corresponding with a partner via email, I accidentally sent the partner a list that contains customer account information, including employee names, email addresses, and phone numbers. What should I do?

A Immediately report the situation to the [Information Security team](#). Even though it was accidental, Customer Confidential Information was shared inappropriately, and Salesforce must take swift action to address what happened in order to comply with applicable data privacy laws and maintain trust with our customers.

Resources



- [Data Processor Binding Corporate Rules \(UK, EU\)](#)
- [Employee Handbook – Information Security](#)
- [Information Security Policy](#)
- [Records Management Policy](#)
- [Records Management Procedures Manual](#)





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Building Trust with Our Company and Investors



Avoiding Conflicts of Interest

Where We're Going

We protect Salesforce and our stakeholders by putting the company's interests ahead of our personal interests or gain. We avoid even the appearance of a conflict of interest in all our business decisions and interactions. We timely disclose a conflict of interest if we cannot avoid it.

Why It Matters

Our reputation is built on our value of trust. Our stakeholders need to know that we are making smart, unbiased decisions. Avoiding conflicts of interest helps ensure we are using good judgment by removing potential bias from the decision-making process. If a conflict of interest arises, we disclose it right away. A conflict of interest is not always a violation of our Code, but not disclosing a known actual or potential conflict is always a violation. When employees are open about potential conflicts, it is easier to find a way to manage them and mitigate their implications. Transparency breeds trust.

How We Get There

We avoid and manage conflicts of interest by:

- Being alert for situations in which conflicts of interest can arise, such as situations that involve personal relationships, outside business activities, or personal financial interests, and staying aware of how our personal relationships and interests can influence, or be perceived to influence, our judgment and decisions
- Discussing potential conflicts of interest with our managers right away
- Disclosing all actual or potential conflicts of interest, including outside business activities and post-government employment restrictions, to the Global Ethics & Integrity team using the Conflict of Interest Submission Portal
- Not engaging in any outside business activities before obtaining complete approval for them, as established by the Conflict of Interest Policy
- Duly complying with actions required by the company to mitigate or resolve a conflict of interest, and properly removing ourselves from decisions where an actual or potential conflict of interest could arise



What You Need to Know

A **conflict of interest** is any situation where an opportunity for personal gain or advancement may compete with the company's best interests. Conflicts of interest can arise when our personal, social, or financial activities or relationships interfere, appear to interfere, or have the potential to interfere with our objectivity, judgment, or loyalty when acting on behalf of the company or any of its subsidiaries.

Conflicts of interest can arise in various ways and can take many different shapes. Our Code cannot describe every possible type of conflict of interest. This is why it is important to understand applicable principles and exercise appropriate and informed judgment. Here are some common situations that can present a conflict of interest:

Personal Relationships

We must not engage in or attempt to influence any business decision that may benefit, or appear to benefit, ourselves or a close personal relation. We avoid putting ourselves in situations where our loyalties to close personal relations could seem like favoritism or could improperly influence our judgment. We do this through:

- Disclosing when a close personal relation is a Salesforce employee or contractor
- Disclosing when we may be in a position to hire, retain, pay, manage, or oversee close personal relations as employees, contractors, or suppliers
- Disclosing if a close personal relation works for or on behalf of (or is) a Salesforce consultant, supplier, partner, competitor, customer, or Public Sector Customer, and is in a position where they can or may influence or make decisions involving or affecting Salesforce

In all cases above, we must recuse ourselves from decisions involving Salesforce and the close personal relation and their company, and we must not engage in discussions about Salesforce or share confidential information with them. For more details on working with close personal relations, refer to the Employment of Relatives and Others in a Personal Relationship Policy.

For purposes of the Code, **close personal relations** include but are not limited to a parent, sibling, spouse, child, in-law, grandparent, grandchild, uncle, aunt, cousin, step-relative, domestic partner, romantic partner, close personal friend, or any other person who regularly resides in your household.



Outside Business Activities

We are expected to devote our full professional energies to our work at Salesforce. We avoid any outside activities, whether for-profit or not-for-profit, that could compete with the company or interfere with our job responsibilities. Unless noted otherwise, side jobs or personal business activities need to be disclosed to the Salesforce Legal team for review and approval, before we engage in them, as established by the Conflict of Interest Policy.

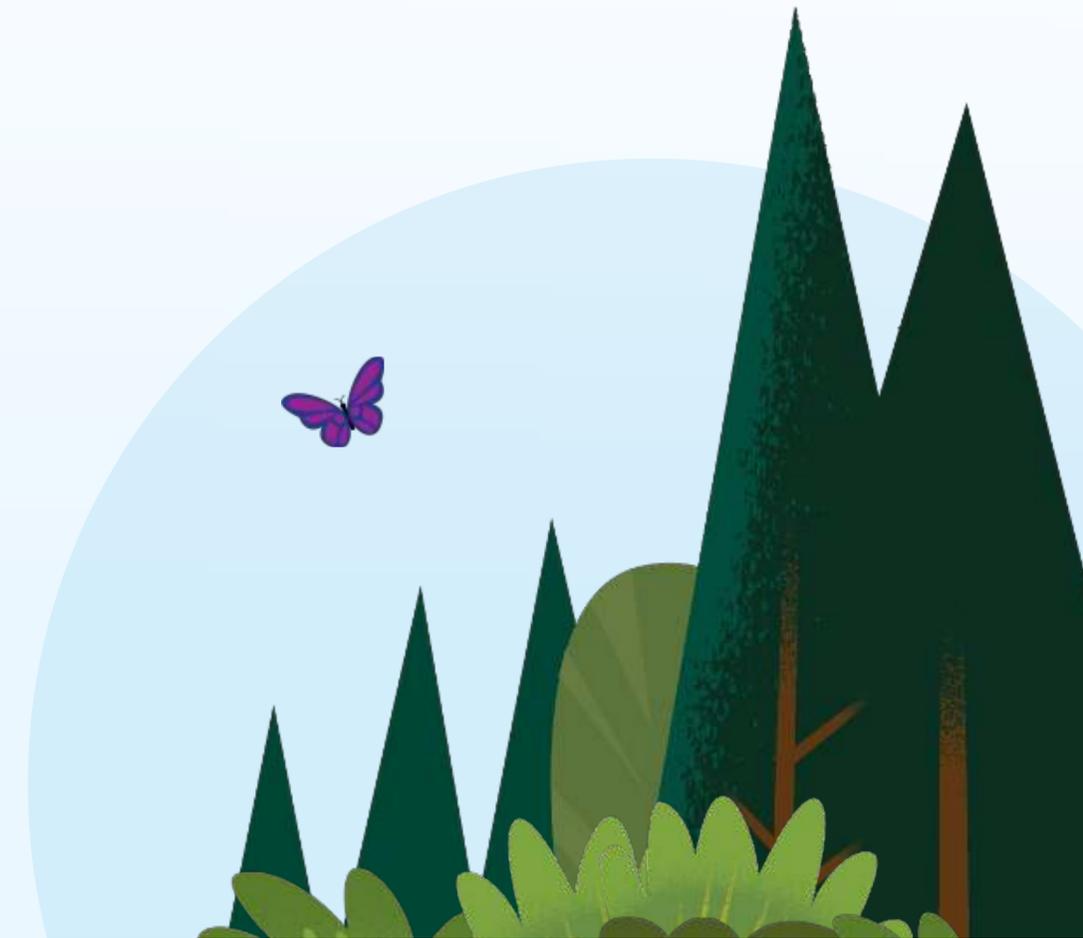
Financial Interests

We ensure that our personal financial interests and those of our close personal relations do not get in the way of our Salesforce decision-making. We avoid holding a significant or controlling interest in any company if that investment could create the appearance of divided loyalty or impact our judgment when acting on behalf of Salesforce. In considering whether an interest is significant, we consider whether the investment could create, or appear to create, an incentive for us to benefit ourself or others at the expense of Salesforce (e.g., we own greater than one percent of the value of the stock of a publicly traded company, or the investment is significant relative to our net worth or base salary).

If we believe a personal financial interest could create or appear to create a conflict of interest, we disclose it for review as a potential conflict of interest. The Salesforce 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. To learn more, check out our Salesforce Officer Investment Guidelines.

Corporate Opportunities

Employees are generally prohibited from taking personal advantage of business or investment opportunities discovered through the use of company property, business, or information. An employee is not permitted to take personal advantage of an opportunity unless they have first presented the opportunity to Salesforce for the company's own consideration, and Salesforce chooses not to pursue it. If uncertain whether an opportunity meets this description or how to proceed, please disclose it for review by the Salesforce Legal team.



Integrity in Action

Q My brother is starting a new small business and asked me to assist with the business plan and the go-to-market strategy, given my experience at Salesforce. I plan on assisting during the weekends only and am not anticipating any compensation, as I'm just helping my brother. Do I need to inform Salesforce about it?

A Yes. This is an outside business activity even though it may not be paid. Outside business activities of all types require disclosure and approval using the Conflict of Interest Submission Portal before you can engage in them. As part of the review and approval process, the company will assess potential risks to Salesforce on things like sharing confidential information, competitiveness with Salesforce products and services, and impact on your overall work responsibilities and performance.

Q I'm an Account Executive and my spouse is employed by one of my customers. Do I need to inform Salesforce about the relationship?

A It depends. If your spouse is in a position to influence or make decisions involving Salesforce, then yes, you need to disclose this as a potential conflict of interest, and can do so using our Conflict of Interest Submission Portal. Disclosure ensures that the company has a record of this and can work with your manager on mitigating the risk properly. If your spouse is not in a position to influence or make decisions involving Salesforce, disclosure is not required, but you should not discuss or share Salesforce confidential information with your spouse or their employer.

Q I became romantically involved with a co-worker. Our teammates don't yet know about our relationship. Do I need to inform Salesforce about it?

A Yes. Having a romantic relationship with someone at work is not necessarily problematic, but such relationships need to be promptly and properly disclosed using our Conflict of Interest Submission Portal, so the company can mitigate the risks they can present. In some cases, changing teams or reporting lines may be required. Both parties should disclose the relationship.

Resources



- [Conflict of Interest Policy](#)
- [Conflict of Interest Submission Portal](#)
- [Employee Handbook – Employment of Relatives and Others in a Personal Relationship](#)
- [Salesforce Officer Investment Guidelines](#)

Preventing Insider Trading

Where We're Going

We protect the information entrusted to us. We never use or share inside information about Salesforce or any other company for the purpose of trading securities.

Why It Matters

Through our work, we may learn confidential information about Salesforce or other companies that is not yet known to the public. Our reputation depends on our protecting this information and never using or sharing it improperly. Trading securities while in possession of material non-public information, or sharing it with others so they may trade, is illegal. Punishments for violations are severe, including heavy fines and even jail time.

How We Get There

We prevent insider trading by:

- Understanding what could be considered material non-public information and protecting it from accidental disclosure
- Never buying or selling shares or other securities, whether directly or indirectly, in Salesforce or any other publicly traded company, when in possession of material, non-public information
- Complying with all trading windows, trading blocks and closures, including for transacting in Salesforce securities (subject to certain limited exceptions set forth in the Insider Trading Policy), regardless of the trading platform used
- Never “tipping” – giving material non-public information to others so that they may trade
- Only sharing confidential information and material non-public information with employees who have a business need to know, and never sharing it with friends or family members or anyone outside Salesforce, except under a confidentiality agreement approved by the Legal team for legitimate business purposes
- Only trading securities once material non-public information about the relevant company has become publicly available and investors have had time to absorb it

What You Need to Know

Insider trading occurs when an individual trades securities on the basis of material non-public information or shares material non-public information with others who trade on the basis of that information (also known as “tipping”).

Information that is material and is not available to the public is called **material non-public information**. Information is material if a reasonable investor would consider it important in deciding whether to buy, hold, or sell a company’s securities.

Common examples of material non-public information include key changes in management, significant pending or proposed mergers and acquisitions, other major business plans, and financial results that have not been publicly released.

Integrity in Action

Q

My manager just told our team about a possible acquisition of another public company. We will be putting in long hours analyzing the financials of the deal over the next month. I’m excited about the opportunity to work on such a high-profile project, and I need to let my family know why I’ll be working a lot more. Is it okay to tell them the news?

A

No. You can let your family know that you will be working additional hours over the coming month, but do not disclose why or reveal any information about the potential acquisition. Disclosing this confidential information not only would violate your duty of confidentiality to the company and the Code of Conduct, but it could be considered “tipping,” and would put you, the person you told, and the company and the deal itself at significant risk. If anyone traded on this information, both you and the tippee could be held liable for insider trading.

Resources



[Insider Trading Guidelines](#)

[Insider Trading Policy](#)

[Insider Trading Video](#)



Protecting Our Information Assets

Where We're Going

Our data, confidential information, and intellectual property are crucial assets for our business. We honor the privacy of personal data and protect our information assets from any unauthorized disclosure or misuse.

Why It Matters

Information assets are fundamental to our business. These include our confidential business information, intellectual property, the personal data of current and former employees, and the personal data related to marketing leads and other business development activities. Safeguarding these assets upholds the privacy of our employees and business partners and protects our reputation and the future of our business.

How We Get There

We protect the information assets in our possession or control by:

- Safeguarding personal data and confidential or proprietary information, and limiting access only to those who need it to do their job on behalf of Salesforce
- Providing notices to individuals about how their personal data can be collected, used, and shared
- Properly securing the documents, devices, and systems where our information assets are stored and processed, according to our company policies
- Protecting confidential information of other companies, business partners, and third parties we work with, including by not sharing or using confidential information belonging to any former employers

What You Need to Know

Personal data includes data and characteristics that can be tied, directly or indirectly, to an individual, such as home addresses, medical information, tax identification numbers, IP addresses, fingerprints, or location data.

Confidential information about our business can include:

- 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
- Any non-public information that might be of use to competitors, cybercriminals, or other malicious actors

Resources

- [Global Controller Privacy Policy](#)
- [Information Security Policy](#)
- [Records Management Policy](#)
- [Records Management Procedures Manual](#)

Protecting Our Financial Assets

Where We're Going

Our financial assets and records support our work and help us meet our commitments to our stakeholders. We preserve the integrity of these assets and protect them from any fraud, waste, or abuse.

Why It Matters

Our books, records, accounts, financial statements, and disclosures must properly and accurately reflect the company's business activities. This is required by law and helps us make informed decisions and ensure that our investors have access to accurate information about the company. Avoiding fraud and waste, and acting in the company's best interests when it comes to financial assets, helps keep Salesforce strong, viable, and successful.

How We Get There

We protect our financial assets by:

- Recording all information accurately and in a timely manner, including work hours, expenses and expense reports, and sales contracts and revenue
- Ensuring that all transactions include proper supporting documentation and required approval records
- Following our records management procedures and retention schedules when saving, archiving, or destroying paper or electronic documents
- Never misrepresenting or concealing important facts about the company's financial performance
- Promptly disclosing all sale and purchase transactions with the same company that occur within meaningful proximity in time (typically within approximately three months of each other) to the [Revenue Recognition team](#)
- Never doing anything that could cause an error or misrepresentation in our financial statements, such as entering into a side agreement, shifting expenses into the wrong quarter, or entering false information into our systems
- Never altering, concealing, or destroying any document under a legal hold
- Looking out for fraud, theft, misuse or other unethical behavior
- Reporting to [EthicsPoint](#) any irregularity or red flag that could indicate fraud or corruption

What You Need to Know

In addition to laws governing the accuracy of our financial statements, Salesforce is also subject to and must comply with applicable anti-money laundering laws. **Money laundering** hides the original source of funds obtained through illegal activities. To uphold integrity in our communities, we must be alert for red flags in financial records and accounts that could indicate money laundering or other forms of corruption.

Signs of money laundering may include:

- A lack of basic information or documentation about a company
- Using complex organizational structures or shell companies
- A company using an offshore bank or only wanting to pay in cash

Integrity in Action

Q A customer wants to buy Salesforce products, but is not confident in their ability to implement the products. They don't have the budget to hire an implementation partner. Is it okay for me, as their Account Executive, to agree in an email that I will "take care of" the implementation?

A No. Since this would be a commitment executed outside of Salesforce's standard contract approval processes, it would likely constitute a side agreement or side letter, which is prohibited under Salesforce policy, regardless of intent. Side agreements can lead to inaccuracies and misrepresentations in our financial statements, which could seriously damage our reputation and result in civil and criminal investigations of the company and its personnel.

Q I am an Account Executive and am negotiating a deal with my customer. During the negotiation, the customer suggested that Salesforce purchase some products from them, to help expedite the sales cycle with Salesforce. Do I need to let anyone know about this request, or seek any approvals before proceeding?

A Yes. Concurrent transactions (selling to and buying from the same company in close proximity in time) require disclosure internally. Concurrent transactions can present risk and require special approvals if the arrangement is also reciprocal, meaning that the buying and selling transactions are tied to each other. This is the case even if the two transactions are not occurring within close proximity in time. Reciprocal transactions are prohibited unless disclosed to both our Procurement and Revenue Recognition teams and approved by the Salesforce Chief Financial Officer and Chief Legal Officer. You should escalate this request from your customer up your management chain, make the required disclosures, and seek the necessary approvals. Please refer to the Concurrent Transactions Policy for further details on disclosure and approval of these transactions.

Resources



[Concurrent Transactions Policy](#)

[Concurrent Transactions Policy Guidelines](#)

[Global Anti-Fraud Policy](#)

[Records Management Policy](#)

[Side Letter Guidelines](#)



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Building Trust with Our Communities



Building a Sustainable Future

Where We're Going

We consider the planet to be a key stakeholder. We aim to blaze the trail toward bold climate action and the achievement of key sustainability priorities.

Why It Matters

At Salesforce, we believe business is the greatest platform for change. We integrate sustainability into all aspects of our business and are committed to leading environmental stewardship for a better future.

How We Get There

We build a sustainable future by:

- Procuring renewable energy or renewable energy certificates equivalent to the global electricity we use, and purchasing carbon credits equivalent to our residual greenhouse gas emissions annually
- Protecting and restoring nature, and supporting customers on their net zero, nature positive journey
- Partnering to design and create energy- and resource-efficient data centers and workspaces
- Including environmental criteria when selecting and evaluating suppliers and business partners
- Supporting environmental resource groups and sustainability champions within the Salesforce ecosystem

Resources



- Global Environmental Policy



Respecting Human Rights

Where We're Going

Upholding the dignity of every human being is embedded in our core values and our business. We honor the principles of internationally recognized human rights and expect our suppliers and business partners to do the same. Salesforce is committed to working with all its stakeholders to promote human rights and avoid human rights abuses.

Why It Matters

We are deeply committed to respecting the human rights of individuals and communities throughout our business and value chain. We believe human rights abuses have no place in our global society.

How We Get There

We respect human rights by:

- Providing a healthy and safe work environment for our employees, contractors, interns, volunteers, and guests
- Advocating for equal treatment and opportunity throughout our organization and the communities where we operate
- Paying our employees fairly
- Never using forced or involuntary labor of any kind
- Ensuring suppliers know and follow our human rights requirements

Integrity in Action

Q I have been working with a supplier for quite some time. I recently became aware that they were convicted of wage theft – the practice in which an employer does not pay proper wages due to workers. What should I do?

A You should immediately report this situation to [EthicsPoint](#). Upon receiving your report our Legal team will review and provide proper guidance on next steps, which may include stopping our engagement with that supplier.

Resources



[Global Supplier Code of Conduct](#)

[Human Rights Policy](#)

Investing in Our Communities

Where We're Going

We support the communities where we live and work through corporate philanthropy and by encouraging employees to volunteer their time, talents, and resources.

Why It Matters

Giving back is in our DNA. Salesforce partners with qualified nonprofit organizations (or equivalents in local jurisdictions) and select educational institutions around the world to provide them with the resources needed to create lasting change in their communities. Our employee volunteering and giving programs enable employees to support the causes they care about.

How We Get There

We invest in our communities by:

- Volunteering through our volunteer time off (VTO) program and logging VTO hours via the Employee Impact Hub
- Making charitable contributions to eligible recipients through Employee Giving Programs
- Complying with eligibility requirements for any corporate or employee charitable contribution or donation
- Ensuring that corporate donations are for charitable purposes and not an attempt to obtain improper influence, gain, or advantage
- Ensuring corporate donations are free from improper conflicts of interest
- Following all company policies for corporate giving

Integrity in Action

Q

My customer asked me if Salesforce would donate to their corporate foundation. I have a large pending deal with the customer and the donation is not part of the documented deal negotiation, but I believe it could help to close it. What should I do?

A

You should not proceed with the donation. Corporate donations should be strictly for charitable purposes, and should not be used to influence or reward a business transaction or decision, as set out in the Company Donations Policy. You should not make this donation as it could be perceived as an improper attempt to influence the customer's decision about the pending deal. You should explain to the customer that Salesforce policies do not allow for you to make this donation.

Resources



[Company Donations Policy](#)

[Employee Impact Hub](#)

[Employee Impact Policy](#)

Participating in the Political Process

Where We're Going

We support active, ethical participation in the political process as a company and as individuals.

Why It Matters

Political expression and participation is a fundamental right, and Salesforce encourages employees to be civically engaged. However, it is important to separate our personal political activities from those of the company. Salesforce may make political contributions and support candidates and causes that uphold our corporate values and promote the interests of the company, always in compliance with applicable campaign finance and election laws.

How We Get There

We participate ethically in the political process by:

- Being clear that our employees' individual political participation is their personal choice and not an endorsement from Salesforce
- Never using company time (including volunteer time off), or resources of any type, digital or otherwise, for personal political activities
- Never representing company policy and legislative priorities to [Government Personnel](#), the media, or other outside sources unless you have received authorization to do so from the Global Government Affairs team
- Obtaining proper approval before running as a political candidate for elected office

Integrity in Action

Q I want to get involved in a local political campaign. Is it okay to use a company email list or group, or Slack, to suggest that other employees vote for my candidate of choice?

A No. Using company resources of any type (including work time, Salesforce email, Slack, or network access) to engage in personal political activity is not allowed. Private conversations about public affairs and politics are okay, but company resources may not be used for employees' personal political advocacy. Reach out to the [Government Affairs team](#) with questions.

Resources



[Global Corporate Lobbying Compliance Guideline](#)

[Personal Political Contributions Pre-Approval](#)

[U.S. Political Contributions Policy](#)

Communicating About Salesforce

Where We're Going

We communicate responsibly and openly at Salesforce. When speaking about the company – to the media, the general public, or internally – we make sure to provide consistent and accurate information.

Why It Matters

Communication plays a critical role in our business. We support our open and transparent culture by making sure we communicate appropriately with one another and taking care when communicating with the public or on social media. We ensure the right to free speech and acknowledge the importance of civil discourse, always respecting differing views and considering the impact our communications may have on Salesforce.

How We Get There

We communicate properly about Salesforce by:

- Always being respectful of fellow employees in our internal communications, whether via phone, email, Slack, messaging services, virtual meetings, or any content we create or use
- Sharing only information that is accurate, appropriate, and complete
- Seeking the required approval from our Public Relations team to speak or present at an event, or to speak or make external statements as a Salesforce representative or on behalf of Salesforce
- Directing any inquiries from the media to our Public Relations team, any inquiries from investors or the investment community to the Investor Relations team, and all other inquiries to the Salesforce Legal team
- Never commenting on legal or other sensitive matters or disclosing non-public information to external parties
- Protecting confidential or proprietary information in all our communication
- Being clear that our statements reflect our own opinions, not those of the company
- Being open about the fact that we work for Salesforce when discussing the company or its products
- Remembering that postings on the internet are considered public records, which live forever and can be used by external parties in public relations and news cycles as references

What You Need to Know

Social Media

Almost every employee participates in some form of social media, and all employees are allowed to post about their professional careers and jobs provided that they follow the guidelines above. Regardless of the activity, the lines between our personal and professional identities can blur when we post something in the public domain, and social media posts may impact how others view Salesforce. Remember, the internet is a public place, so handle yourself accordingly.

Integrity in Action

Q

I saw an online posting that said bad things about the company. The author even claimed to work at Salesforce, and based on the username, I think I know who it is. What should I do?

A

You should discuss your concerns and what you have seen with your manager, and report that to the [Social Media team](#), as detailed in the Social Media Policy. Always maintain a respectful and professional demeanor online, just as you would in person. Do not engage in responding to the post online, and don't question the person you believe to be the author of the message, as those actions could improperly escalate the situation.

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[Employee Handbook – Social Media](#)

[Global Communications Policy](#)



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Global Ethics & Integrity team

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Global Gifts and Entertainment Policy questions

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Global Government Affairs team

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