GLOBAL SUPPLIER CODE OF CONDUCT
INTRODUCTION

At Salesforce, we are committed to our values of transparency, trust, respect, and communication. We act ethically in all business dealings and expect our Suppliers to do the same. This Global Supplier Code of Conduct (“Supplier Code”) explains our expectations and provides guidance for meeting these shared standards.

This Supplier Code applies to all Salesforce suppliers of products or services, including consulting firms, independent contractors, staffing agencies, agency temps, licensees, regardless of their title or the product or services they provide (“Suppliers”). Suppliers should also encourage third parties they work with to comply with our standards. In your capacity as a Salesforce Supplier, we expect you to know and follow all federal, state, provincial, and international laws and regulations that apply to your work wherever you do business. For clarity, Suppliers also includes partners, meaning any company or individual who has agreed to the Salesforce Partner Program Agreement.

Transparency, trust, respect, communication, and ethical conduct are critical to all successful business endeavors. These values provide the foundation for a strong relationship between Salesforce and our Suppliers. We look forward to working with your company in bringing innovative products and services to market.

Sincerely,

Craig Cuffie
SVP, Global Sourcing and Procurement

“We act ethically in all business dealings and expect our suppliers to do the same.”
RAISING QUESTIONS AND REPORTING CONCERNS

We count on our Suppliers to help our business succeed and to uphold our values and our high ethical standards. To meet this expectation, we are committed to creating an environment where our Suppliers feel comfortable raising concerns and getting help.

HOW TO RAISE QUESTIONS AND REPORT CONCERNS

Our Supplier Code serves as a guide to ethical Supplier conduct. However, no single document can answer every question. If you are unsure of what to do, talk to one of the reporting resources listed below. Voicing concerns helps us all to do business ethically and proactively address problems or issues.

Salesforce conducts business in accordance with the highest legal and ethical standards. If you believe that someone—whether an employee of a Supplier or a Salesforce employee—is not meeting the standards in this Supplier Code, you should report your concerns. If you learn of an issue through your own internal reporting that potentially impacts Salesforce, you should also report it to our Ethics Point Reporting Line at:

• In the U.S.: 1-866-294-3540
• Internationally: 1-503-726-2414
• Online: http://www.salesforce.ethicspoint.com/

The Ethicspoint Reporting Line (“Ethicspoint”) is Salesforce’s hotline for raising concerns or reporting violations of our Supplier Code, policies, or the law. It is managed by an outside company and is available 24 hours a day, seven days a week. Where allowed by local law, you may make an anonymous report to Ethicspoint. Try to provide as much information as possible so that the reported matter can be fully investigated.
We expect that our Suppliers will not retaliate against anyone who makes a good faith report of a violation of our Supplier Code, policies, or the law, either internally or to Salesforce. Acting in \textit{good faith} means that the report is made sincerely and honestly; it does not matter whether it turns out to be true.

Salesforce will promptly and professionally investigate all reported matters submitted to Ethicspoint and respond appropriately. As a Salesforce Supplier, you are expected to cooperate fully with any investigation. You should openly and honestly share the information you have. We will make every effort to safeguard your confidentiality and, if applicable, your anonymity. Subject to existing contractual obligations, Salesforce reserves the right to terminate our relationship with any Supplier who does not comply with this Supplier Code.

“We Salesforce will promptly and professionally investigate all reports and respond appropriately.”
TRUST

USING SALESFORCE TECHNOLOGY, ASSETS, AND FACILITIES

We trust our Suppliers with a wide range of technology and other tools so they can do their jobs effectively. These tools must be used wisely. Suppliers are responsible for protecting both Salesforce’s property and our customers’ assets. All assets—such as funds, data, systems, equipment, materials, premises, or vehicles—should be used only for their authorized and intended purpose. Suppliers have a responsibility to prevent falsification, distortion, misuse, improper access, destruction, or sabotage of Salesforce or customer assets, documents, or other property. Suppliers that have access to Salesforce computing facilities or data must also protect them from theft, carelessness, misuse, and abuse.

PROTECTING CONFIDENTIAL INFORMATION

Salesforce protects our Suppliers’ confidential information. In return, Suppliers must protect Salesforce’s confidential information. You should never disclose such information to anyone without our express authorization. This includes all of the following:

• The terms and conditions of your agreement with Salesforce
• Salesforce business and marketing plans
• Salesforce intellectual property (trade secrets, trademarks, copyrights, patents, and other intellectual property) and technical information
• Salesforce product plans and designs
• Salesforce business processes
• Personal employee or contractor information
• Any data generated by Salesforce, or received by Salesforce from a third party, that contains or is based on confidential information

“Suppliers are responsible for protecting both Salesforce’s property and our customers’ assets.”

GLOBAL SUPPLIER CODE OF CONDUCT
Only individuals who need to know Salesforce’s confidential information for the purpose for which Salesforce engaged the Supplier should have access to it, and such individuals may only use it for the purpose for which Salesforce made it available to the Supplier. Additionally, Suppliers must follow all applicable data privacy and information security laws and regulations.

Suppliers must effectively manage the retention, maintenance, access, and disclosure of our confidential information. This includes disposing of confidential or highly sensitive documents securely, such as by shredding. If you learn of an actual or potential data security breach involving Salesforce information, you must notify Salesforce immediately.

Additionally, Salesforce expects you to respect intellectual property rights. For example, you may not obtain, distribute, or use unlicensed copyrighted software or information without proper authorization. Salesforce will take all appropriate measures to address Suppliers’ use of unlicensed software on Salesforce-issued equipment.

Consult your internal resources or your Salesforce business contact for guidance about using confidential information.

QUESTION
Amar does freelance coding for Salesforce, and he is working on a new system that will allow Salesforce employees to access data about our customers more quickly. As part of this project, he has access to lists of contact information of Salesforce’s customers. Can he contact a few of them to see if they have any freelance projects he might be able to work on?

ANSWER
No, Amar cannot use Salesforce’s confidential information for his own purposes. When you work with information that belongs to Salesforce, you have a responsibility to protect it and use it only for authorized business purposes.
FOLLOWING ANTITRUST AND COMPETITION LAWS AND FAIR DEALING

Salesforce is committed to competing fairly and following antitrust and competition laws. We expect the same from our Suppliers. You must never enter into any agreements—whether express or implied—that violate the letter or spirit of anti-competition laws. In particular, Suppliers must never discuss the following topics with competitors:

• Pricing
• Splitting potential customers or territories
• Any other tactic to unreasonably restrict competition

In addition, you must never alter or draft agreements with Salesforce to conceal or falsify deal terms.

We expect Suppliers’ marketing and sales activities on Salesforce’s behalf to be ethical. Seek guidance from a resource within your company if you have any questions about competition law. Suppliers who violate these laws may face immediate termination of their relationship with Salesforce.

PRODUCT AND SERVICE QUALITY

Our Suppliers’ products and services must meet regulatory quality and safety standards, in addition to our internal quality standards, policies, specifications, procedures, and contract requirements. Suppliers also have a responsibility to procure goods and services for Salesforce in a responsible manner. You must:

• Follow established Salesforce procurement rules and procedures, including not beginning any work for Salesforce without an authorized purchase order
• Conduct appropriate due diligence before engaging third parties—such as employees, agents, consultants, suppliers, resellers, or distributors—on Salesforce’s behalf and ensure that they agree to adhere to standards similar to ours
• Not subcontract work from Salesforce unless you obtain written consent

“We expect marketing and sales activities on Salesforce’s behalf to be ethical.”
TRANSPARENCY

RECOGNIZING CONFLICTS OF INTEREST
As part of our commitment to transparency, Suppliers must avoid conflicts of interest. You should disclose actual or potential conflicts of interest relating to your activities as a Salesforce Supplier. Some examples of situations that could create conflicts of interest include:

- Loans or favors that the Supplier, a worker, or a family member receives through your relationship with Salesforce
- Improper advantages gained by acting on information learned through your relationship with Salesforce
- Business opportunities that belong to Salesforce
- Suppliers that employ or are controlled by Salesforce employees or their family members

If you think you might have a conflict of interest, raise the issue right away with your internal resources and Ethicspoint. This will allow Salesforce to manage the situation and resolve it appropriately.

GIFTS AND ENTERTAINMENT
While it may sometimes be appropriate to exchange business courtesies in certain locations, it is never appropriate to give or receive a gift or offer of entertainment if it is extravagant, creates a sense of obligation, or is given with the intent to influence a business decision.

Generally, Suppliers should not offer gifts or entertainment to Salesforce employees valued at over $150 per gift. In addition, Suppliers should not offer gifts or entertainment to Salesforce employees at any time during a Request for Proposal (RFPs) or other vendor-selection process.

“Suppliers should not offer gifts or entertainment to Salesforce employees valued at over $150 per gift.”
ANTI-CORRUPTION, BRIBERY, AND KICKBACKS

No matter where you conduct business for Salesforce, all Suppliers must follow anti-corruption laws. These include the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. You must not tolerate, permit, or engage in any form of corruption, extortion, or bribery. This is true whether you are working with government officials or individuals in the private sector.

Here are a few key points to keep in mind about bribery and corruption:

• **Bribery** is offering or giving something of value in order to improperly influence the recipient’s actions. Bribery is illegal everywhere Salesforce does business, and the consequences for offering or accepting a bribe are severe. You may never offer, authorize, give, promise, or accept any form of a bribe, extortion payment, improper payment, gift, or benefit while working on Salesforce’s behalf.

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

• A **facilitation payment** is a tip or small payment made to a government official in order to expedite a routine government action—for example, issuing a permit or providing utility service. These payments are illegal in most jurisdictions and are not allowed under Salesforce’s policies.

If you believe corrupt practices are occurring within our supply chain, report your concerns to Salesforce immediately.

QUESTION

Janelle works for a staffing agency that is trying to set up a Salesforce tech support center, but she is having trouble getting permits to hire local workers. A local businessman tells her, “I can get the permits for you, but we’ll need to offer the clerk a cash gift. If we do that, you can open your office in a month.” Should Janelle agree to this plan?

ANSWER

No, she shouldn’t. What her local contact is describing is a bribe. That’s not how Salesforce operates, and it’s not how our business partners operate. Janelle should notify Salesforce about this situation, even if she does not go through with the plan.
FINANCIAL INTEGRITY, RECORDS, AND ACCOUNTING

Salesforce relies on our books and records to report our financial results, make required legal filings, and make business decisions. As our Supplier, you must keep accurate books and records of all your business dealings with Salesforce. These records must be in accordance with applicable standard accounting practices.

If you know of any actual or potential financial, accounting, or books and records issue related to Salesforce, speak to a Salesforce resource or submit a report to Ethicspoint.

UNDERSTANDING INSIDER TRADING

As a Salesforce Supplier, you may have access to material, non-public information about Salesforce or other companies. Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a company’s securities. You must never buy or sell securities while in possession of material, non-public information or provide that information to others who might trade on it.

If you have any concerns regarding inside information or inadvertent disclosure of inside information, please contact Ethicspoint.

HANDLING IMPORTS AND EXPORTS

Salesforce complies with all international trade laws and regulations that apply to our business, and expects our Suppliers to do the same. Remember that import and export laws apply not only to goods but also to technology, software, intellectual property, and technical information.
RESPECT AND SOCIAL RESPONSIBILITY

Salesforce is committed to diversity and treating team members and partners with fairness, dignity, and respect. We believe in doing business only with Suppliers who share this commitment. We expect our Suppliers to comply with all employment and safety laws, support human rights for all people, and foster a diverse and inclusive workplace. In addition, we expect that our Suppliers will not allow, promote, or facilitate any hate-related or violent speech or materials, whether in the workplace or through electronic communications or transmission of data.

DIVERSITY AND NON-DISCRIMINATION

Salesforce believes that including diverse partners in our business is important to our success. For that reason, we seek to work with Suppliers who perform at a high level and add a diverse perspective to the Salesforce team. We expect our Suppliers to identify, adopt, and integrate diversity into their own supply processes and hiring, including equal treatment of minority- and women-owned businesses in the supplier selection process.

In particular, our Suppliers must make all employment-related decisions based on skills and aptitude, never on legally protected personal characteristics. While these characteristics may vary by local law, they generally include:

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

Solid teamwork also requires all employees to treat each other with dignity and respect. Suppliers must never allow harassment or bullying in the workplace. In particular, our Suppliers must not tolerate behavior—including gestures, language, and physical contact—that is sexual, coercive, threatening, abusive, or exploitative in nature.

For more information on Salesforce’s commitment to equality and our expectations of all Suppliers in our supply chain, please see: https://www.salesforce.com/equality/
WORKPLACE HEALTH AND SAFETY
We also expect our Suppliers to provide workers with a safe and healthy workplace that complies with all applicable health and safety laws and regulations. You must take proactive measures to prevent workplace hazards. This commitment to safety also means that our Suppliers must never tolerate any threats or acts of violence, including intimidation, bullying, and attempts to instill fear in others.

HUMAN RIGHTS AND LABOR CONCERNS
Our Suppliers must respect each individual’s rights, personal dignity, and privacy. While you work on behalf of Salesforce, you must:

• Respect employees’ right to freely associate and bargain collectively in accordance with all applicable laws and regulations
• Follow all applicable laws and regulations regarding child labor
• Allow all employees to leave their employment freely upon reasonable notice, and never use any forced labor or involuntary prison labor
• Compensate employees fairly and follow local wage regulations or collective agreements; where these do not exist, compensate employees at a level that allows them to meet their basic needs
• Ensure that working hours, including overtime, do not exceed applicable legal limits
• Ensure fair and proper hiring, firing, and evaluation practices
PROTECTING THE ENVIRONMENT
Salesforce is committed to protecting and respecting our environment. At a minimum, we expect our Suppliers to follow all applicable environmental laws, regulations, and standards. This includes requirements for chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. Suppliers should have their own environmental management system, including goals to reduce environmental impact, measures and controls (including audits), reporting, and training. Suppliers must comply with all requirements regarding conflict minerals, exercise proper due diligence, and provide evidence that they are in compliance.

COMMUNITY INVOLVEMENT
Salesforce seeks to work with Suppliers who share our commitment to social and economic development and the sustainability of the communities we serve. Therefore, we encourage our Suppliers to proactively and positively engage with their communities.

“We expect our Suppliers to follow all applicable environmental laws, regulations, and standards.”
COMMUNICATION

Transparency, trust, respect, communication, and the highest ethical standards must be the foundation for all decisions taken on Salesforce’s behalf. Communication means that we—and our Suppliers—take the proper steps to train our employees on our values and commitments. In addition, we expect our Suppliers to communicate their ethical standards back to us through monitoring, auditing, and good record-keeping.

TRAINING AND COMMUNICATION

We expect our Suppliers to establish policies and procedures to ensure compliance with this Supplier Code and all applicable laws and regulations. Management at Supplier companies is responsible for the following:

• Communicating the principles in this Supplier Code to employees and third-party partners through training, policy, or other messaging
• Managing compliance with this Supplier Code by employees and third-party partners
• Promptly reporting violations and concerns to the appropriate contact
• Keeping reports confidential to the extent possible and permitted by law
• Protecting employees from retaliation for making a report in good faith

Supplier management must ensure that their direct reports understand these standards.
MONITORING AND AUDITING
Salesforce expects our Suppliers to produce and maintain honest and accurate accounting and business records. That includes reasonable documentation to demonstrate compliance with this Supplier Code. Suppliers should monitor their own operations—including next tier Suppliers—through appropriate due diligence, audits, and similar activities. Salesforce reserves the right to audit or inspect Suppliers’ records and facilities, as applicable and permitted by law.

COMPLYING WITH CONTRACTS
Salesforce’s relationships with our Suppliers are governed by contracts and obligations negotiated by both parties. You should be familiar with—and comply with—the requirements of the agreements in place. Remember that your Salesforce contractual obligations also apply to the vendors and subcontractors who work with you on the services that you provide to Salesforce. If there is a conflict between this Supplier Code and a contract, raise the issue with your internal resources or a Salesforce resource.

“Our relationships with our Suppliers are governed by contracts and obligations negotiated by both parties.”