Living the Twilio Magic

Twilio Code of Conduct
Team,

What we do at Twilio matters, and how we do it matters even more. We are a Company with a unique spirit that manifests in who we are and how we work together. Most importantly, we go out of our way to help each other, we invest in each others' success, we believe in the power of human potential and we do the right thing.

This Code of Conduct provides us with the resources and information we need to operate with the high ethical standards and live the Twilio Magic. Making the right decisions in our work protects our reputation and builds trust with our customers, partners, and one another. Use this Code as a guide in making decisions that will protect our Company and further enhance our reputation. You’ll also find practical guidance for handling situations where doing the right thing may not be immediately clear, and if you are not sure, reach out to your manager, Legal Team or the hotline.

Focusing on building an impactful, high-growth business while operating under our core values is critical to our success. By living the Twilio Magic, we embrace the role that each of us plays in developing an honest and inclusive culture. Our future success depends on following these principles and taking them seriously.

Thank you for following our Code and living the Twilio Magic in all that you do!

Onward!

jeffiel
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Living the Twilio Magic

We take ethical conduct seriously

Twilio’s unique spirit is manifested in who we are and how we work together. The way we act is what living the Twilio Magic is all about. When we think about how we achieve our mission, it starts by applying our values to what we do every day. The purpose of Twilio’s Code of Conduct is to guide our decision making in thoughtful, legal, and ethical ways. The success of our business is dependent on the trust and confidence we obtain from our employees, customers, and business partners. We gain and demonstrate credibility when we act ethically while achieving our goals.

Who does the Code apply to?

Every employee, consultant, contractor, supplier, and board member is required to read, understand and follow our Code of Conduct. Required resources are provided in each section that include applicable policies Twilions are expected to review and understand. We will provide training and education on the Code as well as other important policies. Failure to follow the Code can result in disciplinary action, up to and including termination.

How we use the Code

While we expect you to follow our Code, we cannot predict every issue that might arise, but using this Code and the resources provided can help guide the right behavior. Use our Code to guide your actions, striving to operate with ethics as a core principle and a commitment to remain true to the Twilio Magic.
Living the Twilio Magic

Making good decisions

Consider these key questions to help identify situations that may be unethical, inappropriate, or illegal. Ask yourself:

- Is it legal?
- Is it consistent with our Code and policies?
- Does it reflect the Twilio Magic?
- Would I feel good if the situation was on the internet or news?
- Is it the right thing to do?
- Am I protecting our people, our brand, and our reputation?

Speaking up if we see shenanigans

It's probably safe to move forward if you answer “yes” to all of these questions. If you aren't sure, or answered “no” to any of the above questions, you should stop and ask for help from your manager, your HR Business Partner or the Legal Team, or report the situation to the Ethics & Whistleblower Hotline 1-844-637-6752 or at www.twilio.ethicspoint.com.

As Twilions, we should feel comfortable to speak up, particularly with respect to ethics concerns. We all benefit when we exercise our power to prevent mistakes or wrongdoing by asking the right questions. We do not tolerate retaliation and expect Twilions to speak up without fear so that we can address the problem.

If any part of this Code conflicts with local laws or regulations, only the sections of this Code permitted by applicable laws and regulations will apply. Any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this Code.
Owning our responsibilities

Living the Twilio Magic requires us to fulfill our responsibilities by upholding our values, embracing our Code, complying with all laws and policies, and speaking up if we suspect a violation. It’s important to use good judgment and ask for help if you are unsure about the right course of action. If you see something that you believe violates our Code or any other Twilio policy, take action and report misconduct to your manager or the Ethics & Whistleblower Hotline immediately. If you believe a violation of law has occurred, you can always raise that through the Ethics Hotline or with a government agency.

Managers have a special responsibility to uphold our values and ensure our culture is maintained. We expect Twilio managers to talk to their team about no shenanigans, emphasizing that all work and every interaction must be done in an ethical manner. When an employee raises a concern, managers must ensure they are treated fairly, without fear of retaliation. As a leader, talk about the Code, model the values, create a speak up culture and stay informed of where to go for answers. We expect our leaders to be prompt and report issues to the appropriate HR Business Partner as soon as possible.

I’m concerned about retaliation, should I still report?

It takes a lot of courage to speak up when you suspect something’s not right. We do not tolerate retaliation for raising a concern in good faith about potential misconduct, or for cooperating in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact our Ethics & Whistleblower Hotline.

If I make a report to the Ethics & Whistleblower Hotline, is it confidential and kept anonymous?

The Ethics & Whistleblower Hotline is maintained by a third-party confidential reporting company. Reports will be handled promptly and discreetly. Confidentiality and anonymity will be maintained to the greatest extent possible, as allowed by law.

What if I make a report about a suspected violation and it turns out to be wrong?

If you suspect something, say something! Reporting in “good faith” means you are being honest with information you believe is true and accurate, even if after an investigation it turns out the information was not correct. It’s better to report a potential problem than to wait. You can be confident that you are doing the right thing and that your concern will be handled appropriately.

Required Resources

- Ethics & Whistleblower Hotline 1-844-637-6752 or www.twilio.ethicspoint.com
- Twilio Values
Be Inclusive
We embrace diversity, inclusion, and equal opportunity

What we believe
Diversity is best measured in actions, not words. We strive to create equality and belonging in our overall strategy by building products that will reflect the global population and make communication more inclusive for all. We believe that diversity and inclusion are woven into our core values.

How we achieve it
At Twilio, we believe our existence should strengthen our communities and society overall. Twilio commits to becoming an anti-racist Company, and we commit to acknowledging and addressing systemic racism in society through our work with the community and our customers. We also believe that means we must always work to eliminate bias anywhere it may exist in the workplace.

We do that by:
• Hiring, growing, and retaining people with various experiences from within and outside our industry to build a more equitable tech industry
• Examining and eliminating bias
• Creating an inclusive culture where every Twilion feels welcome
• Intentionally prioritizing equity — at all levels of the Company
• Fostering a culture and environment of belonging
• Making reasonable accommodations for those who experience disabilities and for religious beliefs & practices
• Prohibiting unlawful harassment, discrimination, and retaliation
We embrace diversity, inclusion, and equal opportunity

What is equal employment opportunity?

Twilio is committed to the principles of equal employment. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected under applicable federal, state, or local law.
Be Inclusive

We support and respect each other

What we believe

We are committed to a supportive, respectful, and collaborative work environment, where all Twilions can reach their full potential.

How we achieve it

Twilions are expected to do everything they can to create a culture that is free of harassment, intimidation, bias, and unlawful discrimination. To create an environment where harassment, discrimination, and bullying are not tolerated, we expect Twilions to be upstanders when they feel safe to do so. That means evaluating the situation, speaking up in the moment in a safe and respectful way, and then reporting it.

In doing so, we create an environment in which we all:

- Treat others with respect, fairness, and dignity
- Promote a supportive and open community
- Do not tolerate harassment or discrimination
- Resolve problems with respect and never resort to threats or violence
- Speak up if we see offensive, harassing, or violent conduct
What is our policy on harassment, discrimination, retaliation, bullying, and other behavior?

As discussed more fully in our local employee handbook, policies, and internal rules, we prohibit harassment, discrimination, retaliation, and bullying in any form - verbal, physical, or visual - and will not tolerate any mistreatment by or of anyone at Twilio including employees, contractors, consultants, service providers, vendors, guests, clients, or agency partners in the workplace or in a work-related situation. The premise is simple: everyone has the right to be treated with dignity and fairness. This means that Twilio not only prohibits more blatant forms of harassment and discrimination but also will not tolerate subtler forms of “everyday harassment and discrimination” like stereotyping and repeated microaggressions in accordance with applicable law.

Required Resources
• Local employee handbook or relevant local policy
We make health and safety a daily priority not only because it is the right thing to do, but because it promotes a caring work environment where Twilions can thrive.

What we believe

We look out for each other by promoting a culture that is healthy and safe. Performing our best everyday means we report to work free from any substance that could prevent us from doing our jobs safely and properly. It also means acts of violence or intimidation have no place at Twilio and will be immediately reported.

How we achieve it

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

Drugs and alcohol
We believe that substance abuse is incompatible with the health and safety of Twilions, and we don’t permit it. While we do not prohibit the consumption of alcohol in our offices, you must use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law, and you must be of legal age to do so. Illegal drugs in our offices or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that an employee’s use of drugs and/or alcohol may adversely affect the employee’s job performance, or the safety of the employee, or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee’s appearance, behavior, or speech.

Safe workplace
Twilio is a violence-free workplace. That means we will not tolerate any level of violence or the threat of violence in the workplace. You are not permitted to bring anything that could be considered a weapon to work, under any circumstances. If you become aware of a potential violation of this policy, report it to your HR Business Partner immediately. In case of anything that could be considered violence, contact Twilio Security immediately at nest@twilio.com.
Being an Owner
We protect confidential information

What we believe
We respect the value of non-public information, whether it belongs to Twilio or another company. We must protect all confidential information that has been entrusted to us.

How we achieve it
Twilio’s confidential information is a valuable asset that gives us a competitive advantage.

We take ownership in protecting confidential information when we:

- Limit access to only those whose jobs require it
- Secure documents, data, and devices in accordance with the Twilio Information Security Policy
- Avoid working in public places where there’s a risk of it being viewed or heard by others
- Require all Twilio employees to sign confidentiality provisions and non-employees to sign an appropriate confidentiality agreement
- Remember the obligation to protect confidential information continues even after leaving Twilio
- Treat third-party (i.e. vendor, supplier, customer, or business partner) confidential information just as carefully as you would your own
- Ensure that third-party access to confidential information we own or manage has the appropriate Non-Disclosure Agreement or Privacy and Security Addendum signed and is shared only to the extent necessary
- Immediately report any breaches to the Information Security team and the Legal Team
Being an Owner

We protect confidential information

Examples of confidential information

• Trade secrets
• Research and development ideas
• Proprietary source code
• Contracts, sales, pricing, and invoice data
• Existing or potential client lists
• Nonpublic financial data or projections
• Employee lists and salary data
• Potential acquisitions or investments
• New product or marketing plans

Required Resources
• Twilio Information Security Policy
Being an owner requires us to use our physical, electronic, and information assets responsibly.

What we believe

How we achieve it

Our assets include everything that Twilio owns and uses to conduct business. This can include intangible assets such as our trademarks, logos, copyrights, patents, business plans, ideas, and other trade secrets. It can also include the range of electronic resources and equipment provided to perform our work such as computer equipment, supplies, networking and communications platforms and corporate credit cards. Intellectual property, confidential information and tangible Company resources represent significant Company investment and hard work which sets us apart from other companies.
Being an Owner

We protect our Company assets & use them appropriately

**We protect our competitive advantage by:**

- Following Twilio’s established security controls
- Only using Twilio systems, internet, and third-party technology for lawful and ethical activities
- Accessing data regarding our employees, customers, or business partners only in line with applicable law and consistent with Twilio policies
- Securing laptops, important equipment, and personal belongings
- Always wearing our Twilio badge when in the office, and never giving that badge to someone else
- Never bringing guests on site without going through the visitor process
- Spending Twilio’s money as you would your own – i.e. responsibly
- Knowing what our intellectual property is and following our policies on how to protect it
- Protecting intellectual property, logos, and confidential information by following legal practices, such as non-disclosure agreements and licensing
- Understanding that things we write, store, send, or download on Twilio systems, may be monitored as part of Twilio’s legitimate interest in protecting our assets

**Required Resources**

- Twilio Information Security Policy
- Local employee handbook or relevant local policy
We safeguard data privacy

What we believe

Our employees, customers, our customer’s users, and our business partners entrust us with their data, including their personal data and their communications data.

We are committed to treating that data with care.

How we achieve it

Being an owner requires each of us to handle this data appropriately. We are committed to protecting the privacy and security of data and have implemented policies and procedures that facilitate the extra level of protection required. Ensuring that personal data and private communications data is protected and handled properly is critical to maintaining the trust we are given in these relationships.

We build trust by:

- Building secure products and services that protects our customers’, employees’ and business partners’ data
- Being transparent about how and why we collect, use, and otherwise process personal and communications data
- Following privacy and data protection laws
- Following Twilio’s privacy principles in our Binding Corporate Rules as well as accompanying privacy standards
- Honoring our customers’ privacy choices by using the data in a manner to which the customer agrees
- Limiting the use and transfer of personal data or communications data to the minimum amount necessary
- Using and processing data for legitimate business purposes and on a limited “need-to-know” basis
We safeguard data privacy

Examples of personal data and private communications data include:

- Individually identifying health information
- Family members’ names
- Employee ID, government identification number (such as a passport, license, or national ID number)
- Contact information such as email addresses or telephone numbers
- Credit card or personal financial account information
- IP address/device ID
- Customer message detail records
- Customer email communications
- Call or video recordings or transcriptions

I accidentally sent a report that includes certain customer personal data to the wrong customer. What should I do?

Contact the Security Incident Response Team at security-sirt@twilio.com who can convene an appropriate cross-functional team, including members of the privacy team, to help guide appropriate remediation efforts based on the circumstances of how and with whom the data was inadvertently shared.
We communicate appropriately

What we believe

We believe being owners requires our communications to be honest, relying on the fact that what we say matters.

How we achieve it

We speak with one voice when communicating about our business.

We are extremely careful to ensure that we:

- Do not speak on behalf of the Company unless authorized to do so
- Do not disclose confidential information and relationships
- Do not disparage our customers
- Use social media wisely, making clear any personal postings are your own individual views and not on behalf of Twilio
- Do not post on social media anything that might be seen as a threat, harassment, or bullying
We communicate appropriately

If you’re still unsure about whether to post something on social media, ask yourself:

1. Could the post possibly contain confidential trade or business secrets?
2. Could the post be perceived as disrespectful to our customers, clients, suppliers, vendors, partners, or competitors?
3. Am I being clear that I am writing the post on my own behalf?
4. Am I being transparent about working at Twilio if I am posting about Twilio or its competitors?

Responding to the media or government inquiries

Any and all media inquiries or requests for commentary should be immediately referred to press@twilio.com. Don’t engage with industry analysts or members of the press.

Do not engage in conversations about Twilio with industry analysts or members of the press.

Additionally, responses to inquiries from a government agency must be truthful and provide accurate information. Upon receiving this type of request, you must provide it to the Legal Team before responding.

Required Resources

- Corporate Communications Policies and Procedures
No Shenanigans
We build partnerships based on merit

**What we believe**

We work with others who commit to our high ethical standards. We view our customers, suppliers, and vendors as true partners. We require transparency and honest behavior in all of our interactions.

**How we achieve it**

We are committed to dealing fairly with our customers, suppliers, and vendors— one dishonest act can seriously damage the relationship. We know our partners can affect our reputation and require these partnerships to be based on a commitment to ethics and mutual trust.

**We build partnerships of merit by:**

- Making decisions based on quality, price, and service
- Choosing business partners that are committed to our ethical standards and agree to follow our Supplier Code of Conduct
- Treating our partners fairly
- Avoiding things that could create even the appearance of a conflict of interest

**Required Resources**

- Supplier Code of Conduct

**What is a Partnership? Is that the same thing as a third-party relationship?**

We consider partners the same as third parties. We may enter into purchase commitments or agreements with these entities to assist in performing operations. These partnerships could include suppliers, distributors, agents, contractors, consultants, clients, vendors and even customers.
We compete fairly and honestly

What we believe

We believe in being bold, but our hunger to build a meaningful and impactful Company can only be achieved when we compete fairly and honestly.

How we achieve it

We compete fairly by delivering a high-quality product, and never by entering into any agreements that interfere with fair trade. By putting our customers first, we build brand loyalty and market share.

We compete honestly and within legal boundaries when we:

- Gather competitive intelligence through appropriate public sources and never misrepresent who we are
- Avoid any agreement with competitors that limit competition by setting prices, dividing territories, markets, or customers
- Refuse to participate in any form of bid rigging with a competitor
- Refuse to agree with a competitor to boycott another company or prevent another company from entering the market
- Are careful at conferences and trade shows by avoiding discussions of competitively sensitive subjects, such as non-public prices or costs
- Refuse to use our market strength to unfairly harm or unlawfully prevent competition
- Do not use and immediately contact Legal if we come into contact with proprietary information of a competitor or other third party that we do not have permission to possess
- Prohibit employees from inappropriately using any third-party confidential information, including from prior employers
I had a conversation at a trade association meeting with a competitor about an upcoming government bid. He asked me what our current pricing was and if we could agree to not go below a certain amount. Was this ok?

No. You should never discuss these topics with a competitor. Report the conversation immediately to the Legal Team. Any violation of competition laws could result in damage to our reputation, prison sentences and significant fines. You can help protect Twilio by reporting it to the Legal Team so they can handle it.
We do not tolerate bribery

**What we believe**

We win business on the strength of our products, people, and services. Corruption is shenanigans and has no place at Twilio. As Twilions, we build our business with transparency, trust, and a commitment to doing the right thing.

**How we achieve it**

Our success is based on the quality of services we provide to our customers and never on unethical behavior. If you feel that payment of a bribe is necessary, walk away from that situation and refuse to engage in these shenanigans. Business obtained in this manner is not the business we want.

**We avoid these shenanigans by:**

- Never bribing or paying kickbacks
- Avoiding hidden terms in deals or side deals and seeking transparency in all transactions
- Not engaging in corrupt payments to speed permits, approvals, or government processes
- Hiring candidates on their merit and not based on a personal benefit to a customer or government official
- Using reputable partners and reporting any concerns of unethical behavior
- Ensuring charitable donations support a legitimate cause, and not donated as part of a favor
- Keeping accurate business records
We do not tolerate bribery

Red flags
Stop and seek help if you hear statements like these

“This is just the way we do business here.”

“Approval isn’t required for this type of payment.”

“If you donate to this charity or to this candidate, we could speed things up.”

“Can you pay the commission to this other person” or in a different country.

“We can write a side letter for that part of the deal, it doesn’t need to be in the main contract.”

I was asked to get an internship at Twilio for a relative of a government official who is currently reviewing some of our business activities in the region. Is this something I can do?

No. You can provide the information to have the relative apply as all other candidates do. Doing anything more than that could be viewed as a bribe.

What is a bribe?
Bribes can appear in many forms and are not always obvious. The promise of a job, gift, trip, charitable contribution can all be considered a bribe if provided for favorable treatment.

What is a kickback?
Kickbacks can be money, a gift or other item of value given to someone who helped with a transaction. We need to be diligent in gifts that are provided to vendors by ensuring they are of minimal value and can’t be construed as a kickback. For example, Twilions involved in HIPAA-eligible products must ensure that any gifts to healthcare customers must be of nominal value and a common business practice.

Required Resources
- Anti-Bribery and Anti-Corruption Policy
- Supplier Code of Conduct
We act responsibly with gifts and entertainment

**What we believe**

We are careful in giving and receiving gifts so that we can make the decisions that are best for our reputation.

As Twilions, we build our business with honest business practices, neither giving nor receiving inappropriate gifts.

**How we achieve it**

Any gifts we give or receive reflect our commitment to operating without shenanigans. Where there is no intent to improperly influence others, and depending on the circumstances, it can be appropriate to exchange modest gifts depending on who is receiving the gift. Many countries in which we do business prohibit and severely restrict the giving and receiving of gifts, travel, lodging, meals, or entertainment to government officials. We are responsible for understanding and complying with these laws and regulations.

When we give or receive any gift, we ensure it does not:

- Have the appearance of or attempt to influence decision-making
- Create a sense of needing to return the favor
- Violate any law, regulation, Twilio policy, or partner policy

We do not give gifts that are:

- Lavish or excessive
- Cash or cash equivalents
- Frequent or asked for
- Undocumented in Twilio records
- Inconsistent with local business practices
- Inappropriate for the occasion
We act responsibly with gifts and entertainment

**Government officials**

We must never promise, offer or give gifts, entertainment, gratuities, meals, lodging, travel, or similar items to a government official without carefully reviewing Twilio’s Anti-Bribery and Anti-Corruption Policy. Special rules apply to the giving of courtesies to government officials and what may be fine for a commercial business partner might pose a problem for a government official and for Twilio. It isn’t always obvious who a government official is and given the risks if we do not follow the rules, it is important to seek guidance ahead of time. We never give gifts to thank government officials for doing their jobs. However, infrequent and modest gifts and business entertainment for government officials that is directly tied to promoting Twilio services and products might be permissible. If you have any concerns, consult with the Legal Team at ethics@twilio.com before giving any gifts or business courtesies to a government official.

**Required Resources**

- Anti-Bribery and Anti-Corruption Policy
- Travel & Entertainment Policy

A vendor has offered me tickets to the Super Bowl. Can I accept them?

**C**

No. Even if you think the gift won’t affect your ability to be fair in future business decisions, others may not see it that way. This gift is above the limit we allow.
We avoid conflicts of interest

What we believe

We put Twilio’s company goals and customer interests before personal gain. This commitment to ethical behavior helps us make unbiased, smart decisions that benefit our business.

How we achieve it

We use good judgment and act in Twilio’s best interests when we avoid situations in which competing loyalties could cause the pursuit of a personal benefit at Twilio’s expense. Even the appearance of a conflict can be as damaging as an actual conflict. It’s simple: we must always act in the best interest of our Company.

We put Twilio’s best interests before our own when we:

- Disclose potential conflicts of interest
- Refuse to accept gifts, entertainment and other business courtesies that could influence decision making
- Remain alert for situations where personal activities or relationships could affect our objectivity
- Remove ourselves from resolving conflicts of interest where we are a party
- Avoid competing loyalties
- Only benefit from employment with Twilio through our normal compensation program
- Avoid using Twilio work for personal gain
- Obtain pre-approval for Board seats, consulting, or other outside employment
We avoid conflicts of interest

While potential conflicts of interest can present themselves in many different scenarios, below are common areas that often arise.

Financial interests
We avoid making personal investments in companies that are Twilio competitors or business partners when the investment might cause, or appear to cause, action that could harm Twilio. If weighing whether to make a personal investment, ask whether it will create a conflict of interest and consider the relationship between the business of the outside company. Any passive investment of not more than two percent (2%) of the total outstanding shares of a publicly-traded company is permitted without Twilio approval, provided that the investment is not so large financially (either in absolute dollars or percentage of your total investment portfolio) that it creates the appearance of a conflict of interest.

Outside employment
Outside employment, consulting engagements, advisory roles, board seats, and starting businesses require caution. We avoid conflicts by obtaining approval through the Outside Activities Disclosure process prior to beginning any employment, consulting, teaching, board, or other position outside Twilio. Activity that actually or potentially competes with Twilio will not be approved.

Business opportunities found through work
Business opportunities found through work at Twilio belong to Twilio first. If you want to pursue a business opportunity that arose through work at Twilio, contact your manager and HR Business Partner.

Use of Twilio products
Avoiding potential conflicts of interest also means that you should not use Twilio products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over users outside of Twilio.

Inventions
Developing or helping to develop outside inventions that (a) relate to Twilio’s existing or reasonably anticipated products and services, (b) relate to your position at Twilio, or (c) are developed using Twilio corporate resources may create conflicts of interest. Additionally, such inventions may be subject to the provisions of your Proprietary Information and Invention Assignment Agreement, or other employment agreements. If you have any questions about potential conflicts or intellectual property ownership involving an outside invention, contact the Legal Team.

Required Resources
- Outside Activities Disclosure form
We avoid conflicts of interest

Friends, relatives and co-worker relationships
We avoid participating in the management or decision-making regarding potential or existing Twilio business relationships that involve relatives, spouse or significant other, or close friends. To be clear, just because a relative, spouse or significant other, or close friend works at Twilio or becomes a Twilio business partner doesn’t mean there is a conflict of interest.

We avoid a conflict by:

- Removing ourselves from being the hiring manager for a position in which a relative, spouse or significant other, or close friend is being considered;
- Removing ourselves from any decision-making concerning a conflicted person’s performance review, compensation, promotion, discipline, or termination; and
- Avoid being a relationship manager for a company associated with a spouse or significant other.

Finally, romantic relationships between co-workers can, depending on the work roles and positions of the co-workers involved, create an actual or apparent conflict of interest. If a romantic relationship does create a conflict, it may require changes to work arrangements or even the termination of employment. Report any romantic relationship that could create a conflict of interest to the appropriate HR Business Partner.

Note: If you find yourself in any of these situations, ask yourself whether the action you’re considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at Twilio’s expense. If the answer is “yes,” the action you’re considering is likely to create a conflict of interest situation, and you should avoid it.

My sister owns a company that provides the service we have been looking for and I can get Twilio a good deal on the services. Can I hire her?

No, you cannot because it’s a conflict of interest to make a business decision that will benefit a relative. Remove yourself from the situation to avoid a conflict of interest. Pass the opportunity along to your manager or another decision maker that is not in your reporting chain.
No Shenanigans

We do not trade on inside information

What we believe

It is imperative that we follow the law when it comes to buying or selling shares of Twilio, or any other company’s stock. We do not engage in insider trading because it’s illegal and would harm our reputation.

How we achieve it

We are sometimes exposed to information about Twilio, or other companies we conduct business with, that requires us to act with caution. This knowledge makes us “insiders.” Trading on inside information, or tipping someone off, is a crime, violates trust with Twilio’s investors, and is unfair to other investors. Examples of non-public material information can include:

- New products in development
- Significant litigation or a pending regulatory action
- An acquisition or merger
- Positive or negative quarterly earnings
- New or lost customers

We only trade shares of Twilio when the trading window is open, and we do not have non-public material information. Consult the policy for further guidance or updated communications for specific circumstances.

Required Resources
- Insider Trading Policy
I heard we were going to buy one of our competitors. This information isn’t public yet. I’d like to help out a friend and tell her what I know. Can I share it with my friend since I won’t be benefiting?

No. Even though you aren’t personally profiting doesn’t matter. The law also prohibits you from tipping someone off to inside information. Remember, inside information is any material, non-public information about Twilio or any other company. Information is considered material if a reasonable investor would rely on it in deciding whether to buy or sell the company’s stock. If you are unsure if information is material or non-public, ask the Legal Team.
No Shenanigans

We maintain accurate business records

What we believe

We are honest and complete in what we report because keeping accurate records is critical in meeting our regulatory obligations and earning the trust of our customers and investors.

How we achieve it

We keep complete and accurate records because it is a good business practice and helps us meet our legal requirements. Financial accuracy also reflects on our reputation and credibility. We maintain Twilio’s accounts, financial statements, and records accurately, with reasonable detail and in conformity with applicable law and internal controls.

We avoid shenanigans with our records when we:

- Manage records properly by following policies relating to maintenance and disposal, including preserving and protecting documents on a legal hold
- Provide full and accurate information to the government or regulatory agencies
- Ensure financial statements, accounts, time reports, and expense accounts are accurate and complete
- Properly classify transactions in the appropriate accounting period, account, and department
- Ensure records are accessible, complete, and secure
- Avoiding hidden terms in deals or side deals and seeking transparency in all transactions
- Ensure only those Twilions with the appropriate signature authority authorize and confirm expenditures and agreements that bind the Company

Required Resources

- Signature Authority Matrix
- Procurement Policy
We maintain accurate business records

Red flags

Stop and seek help if you hear statements like these

“Just make the numbers work this quarter.”

“Let’s wait and put the sale from this quarter onto next quarter so we can meet the target.”

“I got rid of a stack of files I found in a filing cabinet to get us more space. I have no idea what’s there, but I moved them to the trash area for pick up.”

“Can you sign off on my expense report so that my supervisor doesn’t realize how much we spent on this dinner?”
No Shenanigans

We comply with international trade laws

What we believe

Our work takes us around the world. To operate on a global scale, we are committed to conducting business ethically and in strict compliance with all trade laws.

How we achieve it

We comply not only with the letter but also the spirit and intent of all international trade laws. By respecting the laws where we do business, we contribute to a fair society and help strengthen those communities.

We act with no shenanigans when we:

- Do not conduct unauthorized business with countries or third parties that are under a trade embargo or economic sanctions
- Avoid marketing or distributing any product across international borders without first understanding the regulatory landscape
- Alert the Legal Team if we are requested to participate in a boycott of a company or country
- Are honest with government representatives and officials
- Ensure that our partners are not “Restricted Persons”

Required Resources
- U.S. Export Controls & Economic Sanctions Compliance Program
Empower Others
We contribute to our communities

What we believe

We believe the tools we build can improve lives everywhere. Twilio commits our technology, funding, and time to help organizations change lives in times of crises and prevent crises from happening in the first place.

How we achieve it

We are committed to serving the broader communities in which we live and work. Our commitment is reflected in our social impact arm at Twilio. Our mission at Twilio.org is to fuel communications that give hope, power, and freedom. Through Twilio.org we connect social impact organizations, passionate software developers, and the full power of the Twilio platform to ignite positive change on a local to global scale.

How can I make a difference in Twilio’s environmental and sustainability efforts?

We strive to develop environmentally and socially sustainable chains of responsibility with our suppliers, vendors and other third-parties. Remember our key values: Be Bold and Draw the Owl. We encourage employee initiative; there’s no instruction book, it’s ours to write. If you have an idea to add to these efforts, figure it out and invent the future. Remember, we are bold and driven by a hunger to build a meaningful and impactful Company. We embrace ideas and want our Twilions to recall that every big idea starts small.

Required Resources

- www.twilio.org
We uphold human rights

What we believe

We believe every human being has the right to be safe and secure. We conduct our business in a manner that protects human rights.

How we achieve it

We condemn all forms of human trafficking and commercial sexual exploitation. We will not employ underage children or utilize forced labor. At Twilio, we uphold human rights in all aspects of our work. Doing business with those who uphold the same strict standards helps us respect human dignity.

At Twilio, we identify and mitigate risks to human rights that could impact our employees and our customers. These areas include protecting our customer and employee information and focusing on ethical labor practices, diversity, and anti-discrimination. We take these issues seriously, and through our Twilio Magic, which are the principles we use to build an impactful business while staying true to ourselves, we ensure that our impact is a positive one. Through focused policy implementation, decision making and investments in other non-profit organizations, we are actively engaged in effecting positive change in the global community.

Being an Owner Resources

- Statement on Human Rights
- Supplier Code of Conduct
At Twilio, we are Living the Twilio Magic when we follow the letter and spirit of the guidance and policies outlined in our Code of Conduct. The Code isn’t exhaustive but demonstrates that when you ground your decisions in values and follow the principles described here, you operate within our ethical Code.

If you face a problem and aren’t sure what the best course of action is, reach out to a manager, Human Resources, Legal Team, or the Ethics & Whistleblower Hotline. And always remember, if you see something, say something!

**REPORTING OPTIONS:**

Ethics & Whistleblower Hotline 1-844-637-6752  
[www.twilio.ethicspoint.com](http://www.twilio.ethicspoint.com)

**WAIVER**

Twilio’s General Counsel may grant waivers under this Code for Twilio employees other than executive officers or senior financial officers. Any waiver or modification of this Code for a member of the Board of Directors, executive officer, or senior financial officer must be approved by the Board of Directors and promptly disclosed, in each case as may be required by applicable law or the rules of the stock exchange on which Twilio’s common stock is listed for trading.