



Living the Twilio Magic

Twilio Code of Conduct



A message from our CEO



We do important work every day on behalf of the many businesses and partners around the world that trust Twilio to power their customer interactions. And the way we do it really matters – we infuse trust into everything we do and hold ourselves to a high standard of excellence that we can be proud of

The Twilio Code of Conduct helps each of us make the right decisions for Twilio, the stakeholders we serve, and one another, and it's important that each Twilion understands these materials and takes them seriously. The Code, in addition to the Twilio Magic, is a key part of what sets us apart and enables our success as a business. We hold ourselves accountable to these high standards not because it's written down as a set of policies, but because we share an awesome responsibility as Twilions.

If you're ever unsure of the right thing to do, there are plenty of resources available to help you. Reach out to your manager, the Ethics & Compliance team, Employee Relations, your HR Business Partner, an OG member, or the Ethics Helpline.

Thank you for your thoughtful attention to our Code of Conduct now and as you each continue in your work.

Khozema



Living the Twilio Magic

We take ethical conduct seriously	5
Who does the Code apply to?	5
How we use the Code	6
Making good decisions	6
Owning our responsibilities	6
Reporting concerns	7
Investigations	8

Our Team

We embrace diversity, inclusion and equal opportunity	10
We support and respect each other	11
We keep our workplaces, safe, secure, and healthy	12

Our Responsibilities

We protect confidential information	14
We protect Company assets & use them appropriately	16
We safeguard data privacy	17

We communicate appropriately	18
We maintain accurate business records	19

Our Reputation

We build partnerships based on merit	21
We compete fairly and honestly	22
We do not tolerate bribery	23
We act responsibly with gifts and entertainment	25
We avoid conflicts of interest	27
We do not trade on inside information	30
We comply with international trade laws	31

Our Stakeholders

We contribute to our communities	33
We uphold human rights	34

Resources

Living the Twilio Magic

We take ethical conduct seriously

Who does the Code apply to?

How we use the Code

Making good decisions

Owning our responsibilities

Reporting concerns

Investigations





We take ethical conduct seriously

We reflect Twilio's unique spirit in who we are and how we work together. Achieving our mission 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 a thoughtful, legal and ethical way. The success of our business relies on the trust and confidence we build with our employees, customers and business partners. We establish and maintain credibility when we behave ethically.

Who does the Code apply to?

We expect all employees and Board members to read, understand, and comply with the Code and associated policies. Failure to do so can result in disciplinary action, up to and including termination of employment. Although the Code is written for our employees and board members, it also applies to our contingent workforce (including vendor workers, consultants, and contractors) and suppliers in connection with the services they provide for us. Failure of a member of our contingent workforce or other covered service provider to follow the Code can result in termination of their relationship with Twilio.

Twilio is a remote first company, and remote workers are responsible for following the Code and all relevant employment, corporate and other applicable policies while working remotely, regardless of their work location.

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

Only Twilio's Chief Legal Officer may grant a waiver 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.

Making good decisions

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

Is it legal, honest, and ethical?

Is it consistent with our Code and policies?

Does it reflect the [Twilio Magic](#)?

Would I be comfortable with the situation being reported on social media or the news?

Is it the right thing to do?

Could this situation put our people, our brand, or our reputation at risk?

How we use the Code

The Code contains our standards for ethical conduct at Twilio. By embracing the Code, you commit to upholding the [Twilio Magic](#) and operating in an ethical manner.

Acting in accordance with the Code, acting lawfully, honestly, and ethically, and completing required training are essential for all Twilions. You are also expected to act responsibly and exercise common sense, regardless of whether a policy is in place to prohibit specific behaviors.

To support Twilions in understanding the Code, we are dedicated to providing ongoing training and education on its key principles and guidelines. In situations where the right course of action is not clear, our Company Resources are available to provide guidance and support whenever needed.

Owning our responsibilities

What does it mean to meet the high standards we've set for ourselves? It starts with upholding our values, embracing the Code, and complying with Company policies and applicable laws and regulations. It also involves speaking up if we know of or suspect a violation. Each of us is responsible for exercising sound judgment and asking for help when we are

uncertain about the right course of action. If you observe any behavior that you believe violates our Code or any other Twilio policy, it's your job to report it using one of our Company Resources. In the event of a suspected violation of law, you have the option of raising the issue through the Ethics Helpline or with a government agency. Through these actions, we each do our part to embody the spirit of the [Twilio Magic](#) and uphold our culture.

Managers have a special responsibility to uphold our values and maintain our culture of integrity. They lead by example by discussing the Code and ethical conduct with their teams, emphasizing business integrity in all work and interactions. As leaders, they listen with an open mind, treat all employees fairly, and prevent retaliation against anyone who raises a concern in good faith. Finally, they promptly report any unresolved ethics or compliance concerns to the Ethics & Compliance team. Together, we foster a culture built on trust and ethical behavior.

Reporting concerns

As Twilions, we should feel comfortable speaking up, especially if we have ethics-related concerns. By asking questions and raising concerns if something doesn't seem right, we can actively contribute to preventing and detecting wrongdoing. It's important for you to feel safe when speaking up, and we strictly prohibit any form of retaliation against those who raise questions or concerns in good faith.

You can report concerns using any of our Company Resources, including the [Ethics Helpline](#) at +1-844-637-6752 or www.twilio.ethicspoint.com. Details on ethics reporting and our investigations process are contained in our [Global Speak-Up Policy](#).

Q: If I make a report to the Ethics Helpline, is it confidential and kept anonymous?

A: The [Ethics Helpline](#) is hosted and maintained by a third-party company. All reports will be handled promptly and discreetly. If you choose to remain anonymous, we will not make any effort to identify you. If you provide your name, confidentiality and anonymity will be maintained to the greatest extent possible, consistent with and in accordance with applicable law.

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

A: If you suspect something, say something. Reporting in good faith means you're being honest with information that you believe is true and accurate, even if it turns out that you were mistaken. It's better to report a potential problem than to wait. By reporting an integrity concern, you can be confident that you're doing the right thing and that your concern will be handled appropriately.

Q: I'm concerned about retaliation. Am I safe making a report?

A: Yes, you can feel safe speaking up at Twilio. It takes courage to speak up when you suspect that something is not right. Be assured that we do not tolerate retaliation against anyone who raises a concern in good faith about potential misconduct, or for cooperating in an internal investigation. If you believe you have experienced retaliation, contact the [Ethics & Compliance team](#) or the [Ethics Helpline](#).

Investigations

When we become aware of a potential violation of the law, the Code, or any other Twilio policies, Twilio will take action. When Twilio conducts an investigation, we do so fairly, objectively, and thoroughly, and we take appropriate disciplinary action if we determine that a policy violation occurred. Through the investigation process, we make every effort to maintain confidentiality to the greatest extent possible and in compliance with applicable laws.

All Twilions are expected to cooperate with company investigations, and it's important to feel safe doing so. We do not tolerate retaliation against anyone who participated in an investigation of a possible violation of the Code, our policies, or the law.

Learn more

- [Ethics Helpline at +1-844-637-6752](tel:+18446376752) or www.twilio.ethicspoint.com
- [The Ethics Hub](#)
- [Twilio Magic](#)



Our Team

We embrace diversity, inclusion, and equal opportunity

We support and respect each other

We keep our workplaces safe, secure and healthy



What we believe

Our values are best measured in actions, not words. We strive to create a diverse and inclusive workplace where everyone has the opportunity to thrive. By valuing and respecting one another for who we are and what we offer, we will continue to build great things together.

We embrace diversity, inclusion, and equal opportunity

How we achieve it

At Twilio, we believe our existence should strengthen our communities and society overall. We look to identify and appropriately build new pathways for all communities to succeed at Twilio, but also to create systemic solutions for lasting change in the workplace. We work closely with our employee resource group communities to foster an inclusive culture with community advocacy. We work to eliminate bias anywhere it may exist in the workplace.

We do that by:

- Hiring, growing, developing, and retaining people with various experiences from within and outside our industry to build a more equitable tech industry
- Identifying and eliminating bias
- Creating an inclusive culture and eliminating barriers to inclusion so that every Twilion feels welcome
- Intentionally prioritizing equity at all levels of the Company
- Making reasonable accommodations under applicable law for those who experience disabilities and for religious beliefs and practices

Equal employment opportunity

Twilio is committed to equal employment opportunities based on merit, qualifications, and skills. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, ethnic or national origin, religion or religious creed, protected military or veteran status, ancestry, pregnancy status, sex, gender identity or expression, age, parental status, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled. This applies to all aspects of employment, including recruiting, hiring, job assignment, promotion, compensation, training, and benefits.

Learn more

• [Twilio 2022 Impact and DEI Report](#)



What we believe

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

We support and respect each other

How we achieve it

Twilions are expected to do everything they can to create a culture that is free from harassment, intimidation, bias, unlawful discrimination, retaliation and bullying. 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 are each accountable for:

- Treating others with respect, fairness, kindness and dignity
- Promoting a supportive and open community
- Prohibiting bullying, incivility, workplace violence, harassment, discrimination or retaliation
- Resolving problems appropriately – never resorting to threats or violence
- Being allies and speaking up if we see offensive behavior or other misconduct

Harassment, discrimination, retaliation and bullying

As discussed more fully in our local employee handbooks, policies, and internal work rules, we prohibit harassment, discrimination, retaliation, and bullying in any form - verbal, physical, or visual. We do not tolerate mistreatment of anyone at Twilio, including employees, contractors, consultants, service providers, vendors, guests, clients, or agency partners. This applies at work or in any work-related situation. The premise is simple: everyone has the right to be treated with dignity and fairness. This means Twilio prohibits all forms of harassment and discrimination, including subtler forms such as stereotyping and repeated microaggressions, in accordance with applicable law.

Learn more

- [Local employee handbook or relevant local policy](#)
- [Global Community Engagement Guidelines](#)

What we believe

We make health and safety a daily priority not only because it's the right thing to do, but because it promotes a caring and supportive work environment where Twilions can thrive.

We keep our workplace safe, secure and healthy

How we achieve it

We foster a culture of health and safety where we prioritize looking out for one another. Performing at our best every day means we carry out our work free from any substance that could hinder our ability to perform our jobs safely and effectively. In addition, acts of violence or intimidation have no place within our company and must be reported immediately. Together, we create a supportive environment where everyone can thrive.

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 at work or Twilio-sponsored events, you must always use good judgment. You should never consume alcohol in a manner that leads to impaired performance, inappropriate behavior, jeopardizes the safety of others, or violates the law. You must also be of legal age to do so. The use of illegal drugs, controlled substances, or any other substance that could compromise the safety of yourself or others or performance is strictly prohibited in any workplace setting, whether it's in company offices, remote workplaces, or during Twilio-

sponsored events. If a manager has reasonable suspicion that an employee's use of drugs or alcohol may be negatively impacting their job performance or the safety of themselves or others at work, they may request an alcohol and/or drug screening. Such suspicions should be based on objective symptoms, such as changes in appearance, behavior or speech.

Safe workplace

We strive to maintain a violence-free workplace. This means that any form of violence or threat of violence is strictly prohibited, whether it occurs in company offices, remote workplaces, Twilio-sponsored events, or any activity where you represent Twilio. You are not allowed to bring any items that could be considered weapons to any Twilio-related location or event, regardless of the circumstances. If you become aware of a potential violation of this policy, report it immediately to your HR Business Partner. In the event of a situation that could be perceived as violent or has the potential to escalate to violence, contact Twilio Security immediately at nest@twilio.com.

Learn more

• [Local employee handbook or relevant local policy](#)

Our Responsibilities

We protect confidential information

We protect Company assets & use them appropriately

We safeguard data privacy

We communicate appropriately

We maintain accurate business records



What we believe

We respect the value of non-public information, regardless of whether it pertains to Twilio or another company. Each of us carries the responsibility to safeguard confidential information that has been entrusted to us.

We protect confidential information

How we achieve it

Twilio's confidential information is a valuable asset that gives us a competitive advantage.

We ensure the protection of confidential information by:

- Restricting access to only those individuals whose job responsibilities require it
 - Securing documents, data, and devices in accordance with the Twilio Information Security Policy
 - Prioritizing privacy and confidentiality of information on Twilio systems
 - Avoiding working in public places or non-private areas where there is a risk of it being viewed or heard by others
 - Requiring appropriate confidentiality agreements for both employees and nonemployees
 - Upholding confidentiality obligations even after leaving Twilio
 - Treating confidential information of third parties (i.e., suppliers, carriers, vendors, customers and business partners) as carefully as you would Twilio's or your own
- Requiring third parties accessing confidential information owned or managed by Twilio to sign appropriate non-disclosure agreements or data protection addendums
 - Limiting the sharing of confidential information to only what is essential and required
 - Immediately reporting any breaches or vulnerabilities to the Information Security and Legal teams

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



Learn more

- [Twilio Information Security Policy](#)

We protect Company assets and use them appropriately

How we achieve it

Our assets encompass everything that Twilio owns and uses to carry out business operations. This can include both tangible and intangible assets, including trademarks, logos, copyrights, patents, business plans, ideas, and other trade secrets. It can also extend to the various electronic resources and equipment provided for work, such as computer equipment, supplies, networking and communications platforms, and corporate credit cards. Intellectual property, confidential information, and other intangible Twilio resources represent substantial investments and hard work, differentiating us from other companies.

We protect our competitive advantage by:

- Following Twilio's established security controls, including how and where we access Twilio data or resources
- Only using Twilio systems, internet, and third-party technology for lawful, ethical and business appropriate activities
- Never using Twilio equipment to access, download or transmit materials that violate our harassment policies – including pornography or anything that could be perceived as contributing to a hostile workplace
- Understanding that all activity on Twilio equipment, networks, systems or communications platforms – including things we write, store, send, or download – may be monitored as part of Twilio's legitimate interest in protecting our assets

- Ensuring that we access data regarding Twilio employees, customers and business partners in compliance with applicable laws and Twilio policies
- Never misusing messaging apps for work (i.e., capturing and sharing screenshots of Twilio confidential information on unauthorized online platforms), which could result in unauthorized access to our business data and compromise the security of our customer and stakeholder information
- Protecting our intellectual property, logos and confidential information by working with the Legal team and utilizing non-disclosure and licensing agreements
- Never sharing passwords
- Securing laptops, important equipment and personal belongings
- Always wearing our Twilio badge when in the office, and never giving that badge to anyone else
- Never bringing guests on site without going through the visitor approval process
- Spending Twilio's money as we would our own – responsibly and in support of Twilio objectives

By following these guidelines and practices, we uphold our commitment to protecting our company assets and maintaining a secure and ethical work environment.



What we believe

Being an owner requires us to use Twilio's physical, electronic and information assets responsibly and appropriately at all times.

Learn more

- [Twilio Information Security Policy](#)
- [Twilio Global Acceptable Use Policy](#)
- [Local employee handbook or relevant local policy](#)

What we believe

We are entrusted with data from our employees, customers, customers' users, and business partners, including personal data and communications data. We are committed to treating such data with care.

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

A: Contact the Security Incident Response Team immediately at securitysirt@twilio.com. They will be able to coordinate with an appropriate cross-functional team, including members of the Privacy team, to provide guidance on the necessary steps based on the specific circumstances of how and with whom the data was inadvertently shared.

We safeguard data privacy

How we achieve it

Being an owner requires each of us to handle all data appropriately. We are committed to protecting the privacy and security of data, and we have implemented policies and procedures that facilitate the necessary extra level of protection. Ensuring the proper protection and handling of personal data and private communications is crucial to maintaining trust in our relationships.

We build trust by:

- Developing secure products and services that protect customer, employee and business partner data
- Being transparent about how and why we collect, use, and otherwise process personal and communications data
- Abiding by all applicable privacy and data protection laws and regulations
- Following Twilio's privacy principles in our Binding Corporate Rules as well as accompanying privacy policies and standards
- Honoring our customers' privacy choices
- 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

Examples of personal data and private communications data include:

- Individually identifying health or health-related information
- Names of family members
- Employee identification numbers and government identification numbers (passport, drivers license and national identification)
- Contact information, including email addresses and telephone numbers
- Credit card or personal financial account information
- IP address/device identification numbers
- Customer message detail records
- Customer email communications
- Call or video recordings or transcriptions

Learn more

- [Twilio Privacy Notice](#)
- [Twilio Global Employee Privacy Notice](#)
- [Twilio's Binding Corporate Rules – Controller and Processor Policies](#)

What we believe

We believe that as owners, it is essential for our communications to be honest, recognizing the significance of our words and their impact.

We communicate appropriately

How we achieve it

We speak with one voice when communicating about our business.

We exercise utmost caution to ensure that we are:

- Not speaking on behalf of the Company unless authorized to do so
- Not disclosing confidential information or relationships
- Not disparaging our customers
- Not posting anything on social media that might be seen as threatening, harassing, or bullying
- Using social media wisely, making clear that any personal postings are our own individual views, and are not being shared on behalf of Twilio
- Using internal tools like Megaphone to find approved content that is appropriate to share with our networks

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

- Could the post possibly contain confidential trade or business secrets?

- Could the post be perceived as disrespectful to our customers, clients, suppliers, vendors, carriers, partners or competitors?
- Is it clear that I'm writing on my own behalf?
- If I'm discussing Twilio or our competitors, am I being honest and transparent about my role as a Twilio employee?

Responding to the media or government inquiries

If you receive any media inquiries or requests for comments, you must immediately forward them to press@twilio.com. We want to make sure our responses come from the appropriate channels, so we leave discussions with industry professionals, analysts and the press to the experts. When it comes to government inquiries or requests, it's essential to provide truthful and accurate responses. But before you do, engage the Legal team for guidance. And if you're ever considering meeting with a government agency or official on behalf of Twilio, contact the Legal team first. They will make sure everything is in order and provide any necessary approvals.

Learn more

- [Corporate Communications Policies and Procedures](#)

We maintain accurate business records

How we achieve it

We keep complete and accurate records because it's good business practice and helps us meet applicable legal requirements. Financial accuracy also reflects on our reputation and credibility, and allows us to make business decisions based on sound data. We maintain Twilio's accounts, financial statements and records accurately, with reasonable detail and in conformity with applicable law and internal controls.

We manage our records properly by:

- Following policies relating to maintenance and disposal, including preserving and protecting documents on a legal hold
- Providing full and accurate information to government and regulatory agencies
- Ensuring that financial statements, accounts, time reports, expense reports and other records are accessible, accurate, complete and secure
- Properly classifying transactions in the appropriate accounting period, account and department
- Insisting on transparency in all transactions – never allowing hidden terms or side deals
- Verifying that only individuals with appropriate signatory authority approve expenditures and enter agreements that bind the Company

Learn more

- [Signature Authority Matrix](#)
- [Global Procurement Policy](#)

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 in them, but I moved them to the trash area for pickup.”



“Can you sign off on my expense report so my manager won't see how much we spent on this dinner?”

What we believe

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

Our Reputation

We build partnerships based on merit

We compete fairly and honestly

We do not tolerate bribery

We act responsibly with gifts and entertainment

We avoid conflicts of interest

We do not trade on inside information

We comply with international trade laws



What we believe

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

We build partnerships based on merit

How we achieve it

We are committed to dealing fairly with our customers, suppliers, carriers and vendors, knowing that even one dishonest act can seriously damage these relationships. We know that our partners' actions can impact our reputation, and enter these partnerships 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 comply with our Supplier Code of Conduct
- Treating our partners fairly
- Avoiding and actions that could create even the appearance of a conflict of interest

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

A: 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, carriers, vendors, distributors, agents, contractors, consultants, and even customers.

Learn more

• [Supplier Code of Conduct](#)



What we believe

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

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 or that may otherwise violate local legal requirements. By putting our customers first, we build brand loyalty and market share.

We compete honestly and within legal boundaries by:

- Gathering competitive intelligence through appropriate public sources – never misrepresenting who we are
- Avoiding any agreement with competitors that limits competition by setting prices, dividing territories, markets or customers
- Refusing to participate in any form of bid rigging with a competitor
- Never entering into an agreement with a competitor to boycott another company or prevent another company from entering the market
- Being mindful of information shared at conferences and trade shows and avoiding discussions of competitively sensitive subjects, such as non-public prices or costs

- Never using our market strength to unfairly harm or unlawfully prevent competition
- Never using confidential or proprietary information of a competitor or another third party without their permission, and immediately contacting the Legal team if we come into contact with such information
- Prohibiting employees from inappropriately using any third party's confidential information, including information belonging to prior employers

Q: While attending a trade association meeting, I had a conversation with a representative from a Twilio competitor about an upcoming government bid. The representative asked me what Twilio's current pricing was, and if we could both agree not to go below a certain amount in our bids. Was this okay?

A: No. You should never discuss these topics with a competitor. You must report the conversation immediately to the Legal team. Any violation of competition laws could result in damage to Twilio's reputation, prison sentences, significant fines, debarment or other sanctions.

We do not tolerate bribery

How we achieve it

Our success is based on the quality of services we provide to our customers – never on unethical behavior. If you’re ever in a situation where you believe that payment of a bribe is necessary, walk away from the situation and refuse to engage. Business obtained in this manner is not the business we want – and it exposes Twilio to significant legal, financial, and reputational risk.

We avoid corruption by:

- Never offering, paying, seeking or accepting bribes or kickbacks
- Avoiding hidden terms in deals or side deals
- Insisting on transparency in all transactions
- Never making payments known as “expediting,” “facilitating,” or “grease” payments, to speed permits, approvals, or government processes
- Making hiring and promotion decisions based exclusively on merit, and never at the request of a customer or government official
- Using reputable agents and intermediaries
- Ensuring that any charitable donations are made in support of legitimate causes, and never given at the request of a customer or government official
- Keeping accurate and detailed books and records

Red flags

Stop and seek help if you hear statements like these:



“This is just the way business is done 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.”

What we believe

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

Never offer or accept anything of value from any third party, whether it is an existing or prospective customer, vendor, or supplier, if it could be considered a kickback. For instance, employees involved in HIPAA-eligible products must ensure that any offering to healthcare customers is of nominal value and is consistent with common and appropriate business practices.

What is a bribe?

Bribes can take many forms and may not always be obvious. Promises of employment, gifts, trips or charitable contribution can all be considered bribery if it appears that the promise was made in exchange for favorable treatment.

What is a kickback?

A kickback refers to the act of giving or receiving illicit payments, favors, or bribes, often in exchange for preferential treatment, business contracts, or other unethical advantage where one party benefits at the expense of the other.

Learn more

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Global Travel and Expense Policy](#)
- [Supplier Code of Conduct](#)



Q: A vendor offers you a cash incentive to prioritize their products. How should you respond?

A: Decline the vendor's offer and immediately report the incident to the Ethics & Compliance team.

Q: I was asked to secure an internship at Twilio for a relative of a government official who is currently reviewing some of Twilio's business activities in the region. Is this okay?

A: No. You can only provide information that would allow the relative to apply for an internship, just like any other candidate. Doing any special favors at the request of a government official could be viewed as a bribe.

What we believe

We are careful in giving and receiving gifts and entertainment so we can make decisions that support the Company's commitment to business integrity. We're all responsible for building our business with honest and transparent business practices. This means we don't give or receive excessive or inappropriate gifts or entertainment, and we keep accurate records relating to the associated costs and people involved.

We act responsibly with gifts and entertainment

How we achieve it

Any gifts or entertainment given or received must reflect our commitment to operating with integrity. Where there is no intent to improperly influence others, it can be appropriate under certain circumstances to exchange modest gifts or host entertainment for third parties. A lot depends on who is receiving the gift. The general limit for gifts and entertainment given or received is \$100 USD or local equivalent.

Gifts and entertainment given or received must not:

- Appear to be an attempt to influence decision-making
- Create a sense of obligation for the recipient to return the favor
- Violate any law, regulation, Twilio policy, or partner policy
- Be lavish or excessive
- Appear to be a quid pro quo, or given in exchange for an improper or personal benefit
- Be cash or cash equivalents
- Be frequent or repetitive
- Be undocumented in Twilio records
- Be inconsistent with local business practices
- Be in poor taste or inappropriate for the occasion

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

A: No. The value of this gift exceeds the allowable limit. And 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.

Government Officials and Public Entity Customers

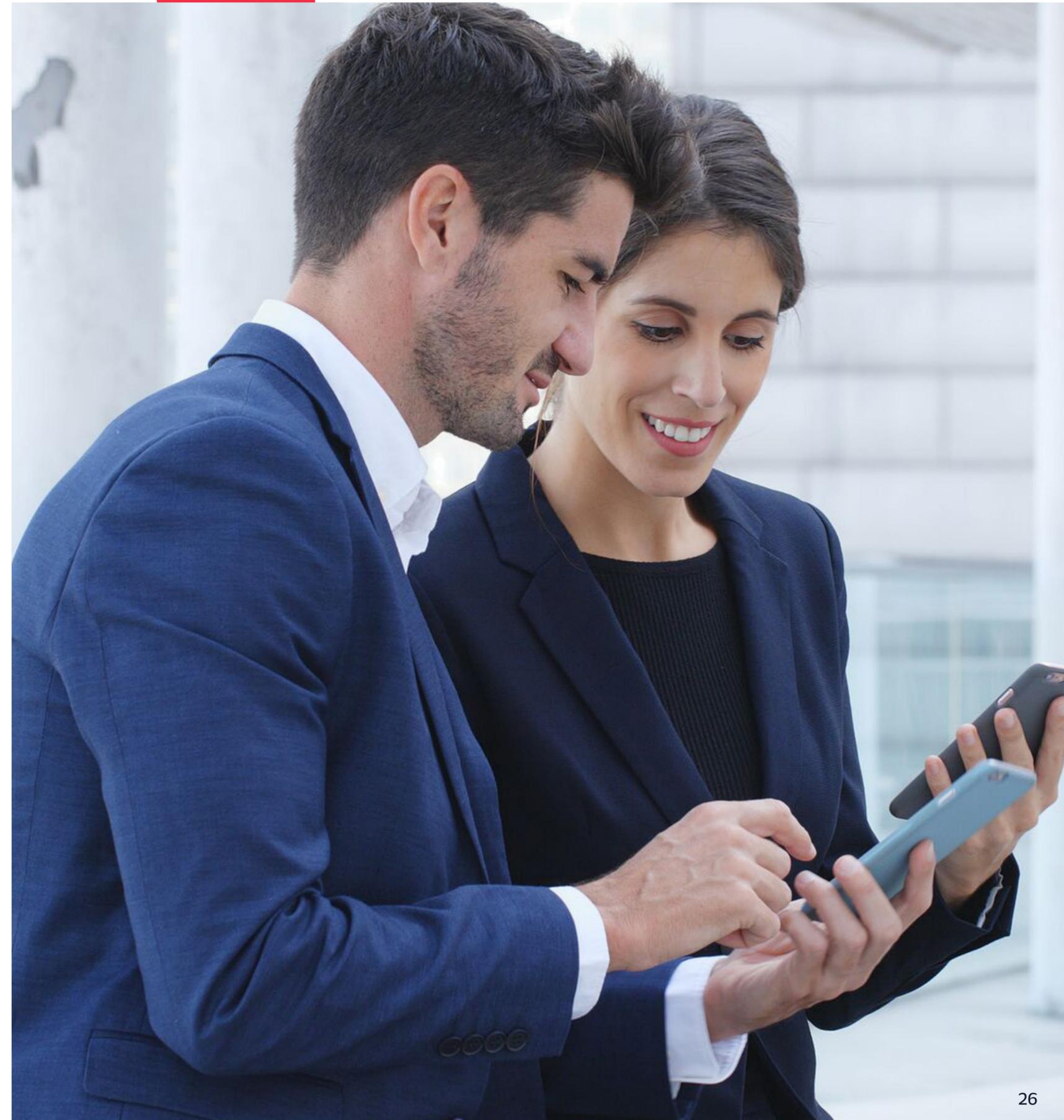
Special rules apply to the giving of courtesies to government employees and officials. Many countries in which we do business prohibit the giving and receiving of gifts, travel, lodging, meals or entertainment to government officials. We are responsible for understanding and complying with these laws and regulations. Even the appearance of impropriety in connection with gifts and entertainment creates risk for Twilio - both for our brand and with regulators.

It's never appropriate to give gifts to thank government officials for doing their jobs. What may be appropriate for a commercial business partner could pose a serious problem for a government official, and for Twilio.

You must never promise, offer or give gifts, entertainment, gratuities, meals, lodging, travel, or anything of value to a government official or public entity customer unless you have received prior written approval from the [Ethics & Compliance team](#).

Learn more

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Global Travel & Entertainment Policy](#)





What we believe

We put the Company's goals and our customers' interests before personal gain. This commitment to ethical behavior helps us make unbiased, smart decisions that benefit our business.

We avoid conflicts of interest

How we achieve it

We act in Twilio's best interests when we avoid situations in which our loyalties are divided or we are personally benefiting 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 by:

- Disclosing outside business activities and any potential conflicts of interest
- Not accepting any gifts, entertainment or other business courtesies that could influence our decision-making
- Remaining alert for situations where personal activities or relationships could affect our objectivity
- Removing ourselves from resolving conflicts of interest where we are a related party
- Only benefiting from our employment with Twilio through our normal compensation program
- Obtaining pre-approval for board seats, consulting or other outside employment

While potential conflicts of interest can arise in many different scenarios, below are some common examples.

Financial interests

We avoid making personal investments in Twilio business partners or businesses that are competitive with Twilio. Such investments could harm Twilio and cause a perception that your loyalties are divided. Before making a personal investment, consider the conflict of interest risk and disclose any potential conflicts to the Ethics & Compliance team. Any passive investment of not more than two percent (2%) of the total outstanding shares of a publicly-traded company is permitted, as long as 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 new business start-ups require caution. We avoid conflicts by obtaining approval through the Outside Activities Disclosure process prior to beginning any such position outside Twilio. Activity that actually or potentially competes with Twilio will not be approved.

Business opportunities

Business opportunities found through your work at Twilio belong to Twilio first. If you're interested in pursuing a business opportunity that arose through your work at Twilio, you must first obtain approval from your manager and your HR Business Partner.

Use of Twilio products

You must 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 Twilio.

Inventions

Developing or helping to develop outside inventions may create conflicts of interest if they relate to your position at Twilio or to Twilio's existing or reasonably anticipated products and services, or if they are developed using Twilio corporate resources. Such inventions may also be subject to the provisions of your Proprietary Information and Invention Assignment Agreement, or other employment agreements. Contact the Legal team if you have any questions about potential conflicts or intellectual property ownership involving an outside invention.



Learn more

- [Outside Activities Disclosure form](#)

Friends, relatives, and co-worker relationships

It's a conflict of interest for a Twilion to participate in management or decision-making of potential or existing Twilio business relationships that involve relatives, spouses or significant others, or close friends. We avoid conflicts by recusing ourselves from:

- The hiring process for any position in which a conflicted person (family member, spouse, significant other or close friend) is being considered
- Decision-making concerning a conflicted person's performance review, compensation, promotion, discipline, or termination
- Managing accounts for any company that is associated with a conflicted person

Personal Relationships

A personal or romantic relationship between co-workers can create an actual or apparent conflict of interest for the individuals involved, depending on their work roles and positions. Twilions must not be directly or indirectly involved in the management of any individual with whom they have a personal relationship. In addition, they must not have the ability to review or influence such an individual's employment status, job evaluation, pay, benefits, or any other work condition. You are required to report any romantic relationship that could create a conflict of interest to your HR Business Partner.

Romantic relationships that create a conflict may require changes to work arrangements, or even termination of employment.



Q: My sister owns a company that provides the service we have been looking for. I can get Twilio a good deal on the services due to the family connection. Can I engage her company as a service provider?

A: No. It's a conflict of interest for you to make a business decision that will benefit a relative. You must remove yourself from the situation and let your manager know you cannot be involved. Your manager may decide to pursue the opportunity, or assign it to another decision maker outside of the reporting chain. The selection of this vendor must follow the appropriate procurement process.

What we believe

It's 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.

We do not trade on inside information

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. We never give or receive "tips" of material non-public information about Twilio or any company.

Examples of material, nonpublic 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 Insider Trading Policy for further guidance or updated communications for specific circumstances.

Q: I heard we were going to buy one of our competitors. This information isn't public yet. I'd like to help a friend by telling her what I know. Is this okay since I would not be profiting personally?

A: No. It does not matter whether you would be personally profiting from sharing this information. The law 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're unsure whether information is material or non-public, ask the Legal team.

Learn more

- [Insider Trading Policy](#)



What we believe

Our work at Twilio takes us around the world. To operate on a global scale, we are committed to conducting business ethically and in strict compliance with all applicable laws and regulations, including laws that govern international trade.

We comply with international trade laws

How we achieve it

We comply with the letter and spirit of applicable international trade laws. By respecting the laws where we do business, we contribute to a fair society and help strengthen those communities.

We uphold business integrity by:

- Doing business only with countries and third parties that are free from trade embargo and economic sanctions concerns
- Avoiding marketing or distributing any product across international borders without first consulting the Legal team
- Alerting the Legal team if we are asked to participate in a boycott of a company or country
- Being honest with government representatives and officials
- Ensuring that our partners are not “Restricted Persons” from a sanctions perspective

Learn more

- [U.S. Export Controls & Economic Sanctions Compliance Program](#)

Our Stakeholders

We contribute to our communities

We uphold human rights



We contribute to our communities

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 from a local to global scale.

Our goal at Twilio is to limit our impact on climate change and to carry out our business activities in a sustainable manner. As a business that is conducted largely online, our carbon footprint may be smaller than manufacturing or other businesses, but we still strive to limit our impact on climate change. In addition, we strive to develop environmentally and socially sustainable chains of responsibility with our suppliers, carriers, vendors and other third parties. More details on Twilio's commitment to environmental sustainability are contained in the [Twilio Impact and DEI Report](#).

Learn more

- [Twilio Impact and DEI Report](#)
- www.twilio.org



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 crisis, and to prevent crises from happening.

We uphold human rights

How we achieve it

We condemn all forms of human trafficking and sexual exploitation. We will not employ underage children or utilize forced labor. At Twilio, we uphold human rights in all aspects of our work. Our commitment to doing business only with those who uphold the same standards helps us demonstrate our respect for 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 commit to ensuring that our impact is positive. Through focused policy implementation, decision-making and investments in non-profit organizations, we are actively engaged in effecting positive change in the global community.

Learn more

- [Statement on Human Rights](#)
- [Supplier Code of Conduct](#)



What we believe

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

Resources



At Twilio, we are Living the [Twilio Magic](#) when we follow the letter and spirit of the guidance and policies outlined in this Code. The Code is not intended to be exhaustive, but is instead a guide for helping you operate with integrity and transparency. If you face a problem and aren't sure of the best course of action, or if you know or suspect that a legal or policy violation has occurred, contact one of our Company resources.

- Your manager
- Your HR Business Partner
- Employee Relations
- The Legal team
- The Ethics & Compliance team
- The [Ethics Helpline](#): +1-844-637-6752 or www.twilio.ethicspoint.com





Today's leading companies trust Twilio's Customer Engagement Platform (CEP) to build direct, personalized relationships with their customers everywhere in the world. Twilio enables companies to use their communications and data to add intelligence and security to every step of the customer journey, from sales to marketing to growth, customer service and many more engagement use cases in a flexible, programmatic way. Across 180 countries, millions of developers and hundreds of thousands of businesses use Twilio to create magical experiences for their customers.

For more information about Twilio (NYSE: TWLO), visit: www.twilio.com.

All rights reserved. Copyright © 2023 Twilio Inc.