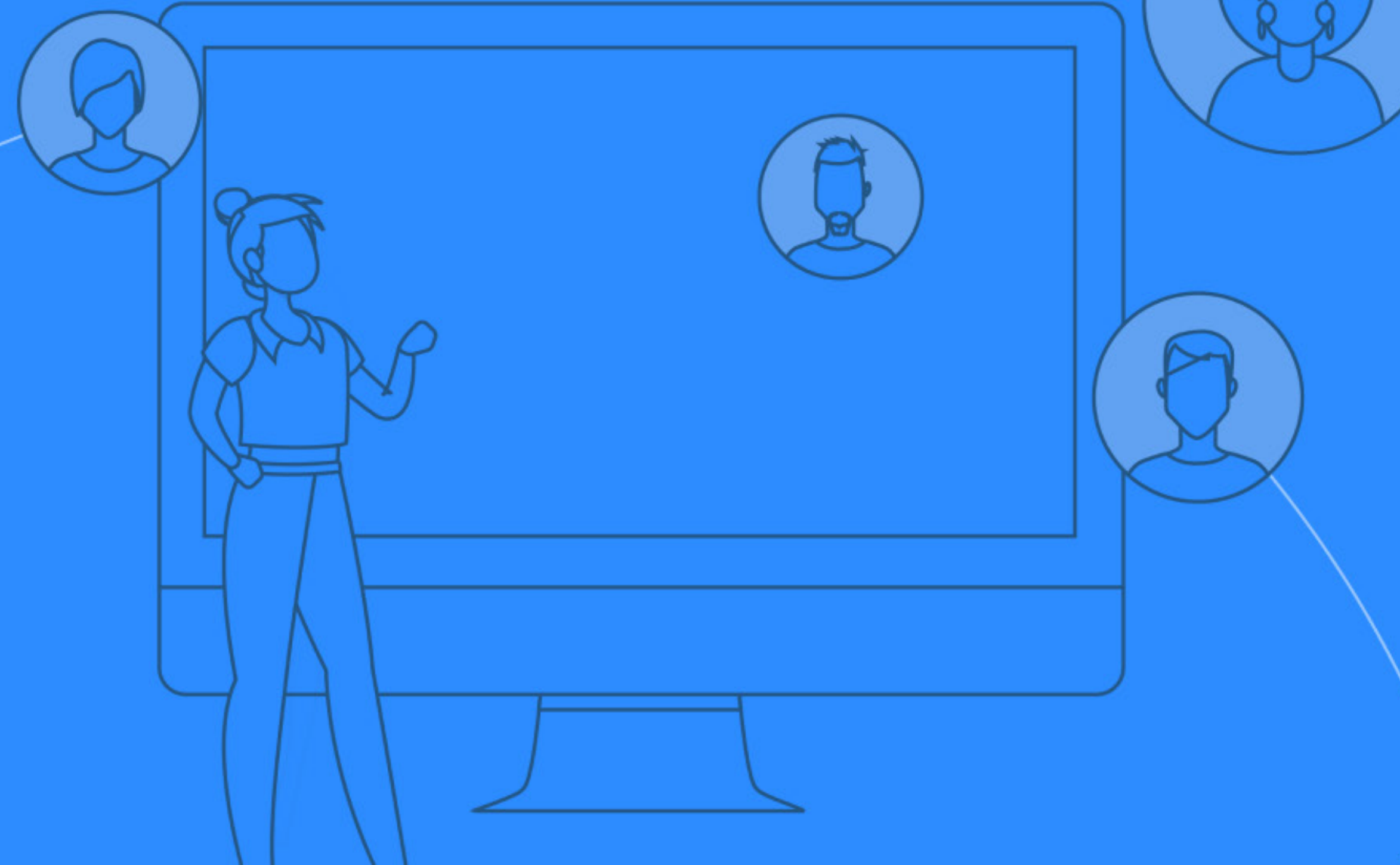


# Code of Business Conduct and Ethics

Leading with Care

zoom



# Message from Eric Yuan

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Dear Zoomies,

As we tirelessly work and innovate to empower people to accomplish more by making video communications frictionless and secure, we must remember to conduct our business with uncompromising integrity and care for our community, customers, company, teammates, and selves. Especially in these challenging and transformative times, our dedication to delivering happiness to our community, customers, and shareholders must include a commitment to doing business the right way, in compliance with the law and ethical business standards. Please read our Code of Business Conduct and Ethics and understand how it applies to your work at Zoom. It is of utmost importance, because I expect every Zoomie to lead with integrity and care, in compliance with the law and our Code.

With gratitude,



Eric Yuan  
Founder & Chief Executive Officer



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## Show You Care by Speaking Up

### 1.1 Why have a Code?

The Zoom Video Communications, Inc. (“Zoom” or the “Company”) Code of Business Conduct and Ethics (this “Code of Conduct” or “Code”) flows directly from our mission and values. We aim for excellence and to deliver happiness for our community, customers, company, teammates, selves, and shareholders by conducting our business with uncompromising integrity and high ethical standards.

Our Code promotes compliance with the law and ethical business conduct across our Company, regardless of our location, functions, or roles. Our Code gives us the tools and information to be good corporate citizens, do the right thing, and avoid even the appearance of wrongdoing.

Our Code requires and sets the company’s expectations that:

- We do business ethically;
- We avoid actual, potential, or perceived conflicts of interest;
- We comply with the letter and spirit of applicable laws and Zoom policies, including full, fair, accurate, and timely disclosure in reports and documents we file with regulatory authorities and in other public communications;

- We act with a duty of truth and candor and are transparent with each other about the way we work together; and
- We promptly report suspected Code violations internally.

### 1.2 To Whom Does our Code Apply?

Our Code applies to all of us globally: directors, executives, and employees of Zoom, Zoom’s subsidiaries, and joint ventures in which Zoom owns a 50% or greater interest or has managerial control. Whenever you see the word “Zoomie”, “Associate”, “you”, “we” or “us” in this Code, it means anyone in those groups. (Zoom may choose to implement separate but equivalent standards to those referenced in this Code for any majority-owned or controlled entities and their employees.) We hold Zoom managers to very high standards and expect them to set the right tone at the top, lead by example, promote our Company values and compliance with our Code, encourage and promote speaking up, and only hire third parties to work on Zoom’s behalf who share our commitments to compliance, ethical business conduct, and good corporate citizenship.



### 1.3 What if I have Questions or Concerns about our Code?

#### Speak Up!

We expect Zoomies to serve as our first line of defense and show care for Zoom by proactively raising questions or concerns about conduct that may be inconsistent with the law, our Code, or a Zoom policy. We have resources available to help you feel comfortable with your responsibility to speak up. When you speak up, your questions and concerns are treated confidentially and with respect. We review them and, where appropriate, investigate and take action to make our Company a better place.

#### How do I raise questions or concerns about our Code?

We want to hear from you regarding any questions or concerns about doing business with integrity. Zoom provides many reporting channels, including managers, the People Experience team, the Legal Department, and the Compliance and Ethics team. The Compliance and Ethics team maintains the following confidential reporting channels for Zoom employees:

- **Chief Compliance and Ethics Officer:** who can be contacted directly and confidentially at [complianceofficer@zoom.us](mailto:complianceofficer@zoom.us) or by mail at the following address:  
Zoom Video Communications, Inc.  
Attn: Chief Compliance and Ethics Officer  
55 Almaden Blvd., 6th Floor  
San Jose, CA 95113
- **SpeakUp Line:** which is hosted by an independent third party to provide an extra layer of confidentiality and anonymity where permitted by law. You can use the SpeakUp Line in a number of ways:
  - Call the SpeakUp Line: 1-800-918-6595 (US)
    - International toll free access information can be found at [speakup.zoom.us](https://speakup.zoom.us)
  - File a SpeakUp Line web report: [speakup.zoom.us](https://speakup.zoom.us)
  - SMS/Text the SpeakUp Line: 408-741-9673 (US)

- **Audit Committee:** Certain reports, such as those regarding the accuracy of Zoom's financial statements or recorded transactions, may also be submitted directly to Zoom's Audit Committee or its Chairperson under our Audit Committee Complaint Procedure.

Your use of these resources is confidential. When using them, you may choose to identify yourself or remain anonymous, where permitted by local law.

We expect Zoomies to ask questions or raise concerns about compliance, and we are always grateful to hear from you. You should also know that if you learn about a potential violation of the law, our Code, or policies, and fail to report it, you may be subject to disciplinary action.

If you encounter a situation and are unsure whether you should speak up, ask yourself these questions about the conduct or issue:

- Is it legal?
- Would it appear appropriate to an outside observer?
- Does it comply with our Code and Company policies?
- Is it consistent with our mission and values?
- If made public, would it reflect positively on Zoom's reputation?

If you cannot confidently answer yes to all of these questions, please speak up using one of the resources in this section as soon as possible.

## 1.4 No Retaliation and Requirement to Cooperate

We expect every Zoomie to show care by promoting a compliant, ethical, and respectful workplace. Reprisals, threats, intimidation, retribution, or retaliation against any person who has in good faith reported a concern, or against any person who assists in an investigation or process with respect to such a report or concern, is prohibited. If you believe that you have been subjected to discrimination, retaliation, or harassment for having submitted a SpeakUp report or other complaint (either internally or to any government agency), or for participating in an investigation relating to such a report or complaint, please immediately report the concern to Compliance and Ethics.

Only authorized members of the Compliance and Ethics and Legal Departments, including outside counsel retained by either, or other subject matter experts expressly authorized by Compliance and Ethics or Legal, are authorized to conduct investigations on behalf of the Company. Zoomies contacted in connection with a Company investigation are expected to fully cooperate and keep information they may learn confidential to safeguard the integrity of the investigation. Failure to keep information related to an investigation confidential can itself be deemed a Code of Conduct violation and may be subject to disciplinary action. Notwithstanding this expectation, employees retain the right to report suspected violations of law to regulatory and law enforcement agencies.

Any violation of this Code or company policies, including fraudulent reports or obstruction of a Company investigation (including dishonesty in an investigative interview or audit), attempting to circumvent or violate a Company policy, or encouraging another to violate a Company policy, is a Code violation, and may result in disciplinary action, up to and including termination of employment and legal proceedings if warranted.

**i** For more information, see our [Speak Up Policy](#).

## 1.5 Waivers and Amendments

Waivers of any provision of this Code must be pre-approved in writing by a committee comprising the Chief Compliance and Ethics Officer and General Counsel, or, in the case of waivers pertaining to executive officers, by the Board of Directors. Such waiver shall be promptly disclosed as required by applicable laws and listing rules.

We are committed to regularly reviewing and updating our Code and policies. We therefore may amend this Code at any time and for any reason. Amendments will be pre-approved by the Board of Directors.





## Caring for our Communities

### 2.1 Anti-Bribery and Anti-Corruption

Zoom expects Zoomies and third parties acting on Zoom's behalf to comply with all applicable anti-bribery and anti-corruption laws. Regardless of local practices or what our competitors do, Zoom prohibits directly or indirectly offering, promising, authorizing or making an improper payment (cash or anything else of value) to anyone, including a government official or government employee, in order to obtain or retain business for Zoom, or to acquire an improper business advantage. You also may not accept any such payment in exchange for conferring an improper business advantage. Zoom also expects its business partners and third parties acting on its behalf to share Zoom's commitment to comply with anti-bribery and anti-corruption laws when doing business that relates to Zoom.

Here are some examples of non-cash things that may violate anti-bribery or anti-corruption laws, or our Code, and could be improper:

- Gifts
- Meals
- Entertainment
- Travel benefits

- Job or internship offers, offered either by you or to you
- Other business courtesies

**i** For more information, see our **Anti-Bribery and Anti-Corruption Policy**, our **Gifts and Hospitality Policy**, and **Section 3.1** below, and if you have any doubt about the propriety of giving or receiving a gift or courtesy, immediately contact **Compliance and Ethics** before acting.

### 2.2 Government Customers

Zoom is committed to following the laws, rules, and regulations that pertain to a government's acquisition of goods and services and the performance of public-sector contracts. There are unique legal requirements that apply to bidding, pricing, disclosure, and certifications for government customers. Activities that may be fine when you are dealing with commercial customers can be prohibited when you are dealing with current or potential government customers and may also give the appearance of a conflict of interest or other impropriety. The penalties for failing to follow government procurement laws are severe and include substantial civil and criminal fines, imprisonment, and debarment of Zoom from doing business with the government. At all times, but especially when dealing with public funds and public officials, Zoomies must follow a high standard of care and strive

to avoid even the appearance of a conflict of interest or other impropriety. When dealing with government customers anywhere in the world, including international governmental organizations, make sure to partner with the Legal Department when bidding for business, and contact Compliance and Ethics with questions related to compliance requirements such as in the area of anti-corruption.

Job or consulting offers from Zoom to government employees and their family members also are subject to legal restrictions and disclosure requirements, especially if a government employee is involved in a matter that pertains to Zoom. It is prohibited to hire any individual, including interns, in exchange for an improper business advantage to Zoom, including securing or retaining business.

## 2.3 International Trade

We are committed to complying with the international trade laws of the United States, including economic sanctions, export controls, and antiboycott laws, and with the applicable trade laws of the countries where we do business.

Economic sanctions impose limits on the people, countries, and jurisdictions with which Zoom and our partners, including distributors, resellers and other channel partners, can do business. Export controls are rules that may require Zoom to obtain licenses to export certain commodities, software and technology to other countries in connection with Zoom's services. Under U.S. laws, "exports" can also include releasing Zoom software, source code and technology to certain non-U.S. persons, even if they are located in the United States.

Under U.S. law, Zoom also cannot participate in certain boycotts, such as the Arab League Boycott of Israel. It is also unlawful for us to agree to other kinds of restrictions in our contracts or agreements with others, including restrictions based on race, religion, sex, or national origin.

Both individual Zoomies and Zoom itself can be held criminally liable for willful violations of international trade laws. We can also face civil fines even if we did not intend or mean to violate the law. Caution is key – if you are ever unsure whether an international trade law might apply to a Zoom transaction, consult with Compliance and Ethics before moving forward.

**📄 For more information, see our [Export Control and Trade Sanctions Compliance Policy](#).**

## 2.4 Privacy

Zoom is committed to respecting the privacy rights of individuals and to complying with applicable privacy and data protection laws. We also expect that all Zoomies and our suppliers respect the privacy, security, and confidentiality of personal information, which is any information that is linked or linkable to an individual. This includes personal information relating to our users, customers (and their end users), Zoomies (and their dependents), our suppliers, and any other individuals whose data we handle, such as IP Addresses, account numbers, meeting information or any other information that reasonably identifies an individual. We must be transparent about our use of personal information, and treat such information in accordance with individuals' reasonable privacy expectations, our

Privacy Statement, and applicable data protection laws. Where we are using personal information to provide services to a customer, we must use that personal information only in accordance with our Privacy Statement or in accordance with the law or other applicable policies.

Zoomies and suppliers who do not protect the privacy, security, and confidentiality of the personal information they handle may cause harm or distress to affected individuals, may put Zoom in breach of our legal obligations under our contracts and applicable data protection laws, and could expose Zoom to legal or regulatory enforcement.





Officers and employees should not expect a right to privacy on Zoom equipment or networks. All communications, e-mails, or Internet use on Zoom equipment or networks may be subject to monitoring by Zoom where permissible and in accordance with applicable laws for legitimate business purposes.

**i** For more information, see the [Data Handling Principles](#), [Community Standards](#), [Privacy Statement](#), and [Employee Handbook](#).

## 2.5 Charitable Donations

Through Zoom Cares, we are committed to combining our funding, technology, and technical expertise to address educational and social inequities, and climate change. Charitable donations, sponsorships, or initiatives that involve Zoom assets are managed and must be pre-approved by Zoom Cares. We commit to doing due diligence and to avoiding conflicts of interest before we make Zoom Cares donations. We will not use charitable donations to gain improper business advantages or facilitate approvals from anyone, including from government officials. Zoomies are encouraged to support personal charitable causes if they so choose but must not use Zoom assets, such as work time, chat, email, the Zoom platform, equipment, or funds to engage in personal charitable activities.

## 2.6 Political Contributions and Activities

Zoom encourages your personal political and civic engagement if you so choose on your own personal time and at your own expense. You may not use Zoom funds to make a political contribution. Also, you should avoid creating an impression that your personal civic or political activities or statements reflect Zoom's or Zoomies' activities or statements. Do not make public comments (including posts on social media platforms) that anyone might think are official Zoom comments or are endorsed by Zoom.

Our interactions with governments are governed by lobbying laws, regulations, and disclosure requirements. Zoom may have an obligation to register and/or report Zoom's lobbying activities under applicable law, including the government relations-related activities of employees and outside consultants or advisors. To be clear, only certain Zoom employees in the Government Relations Department are authorized to lobby on behalf of Zoom. If anything you work on is related to lobbying government officials or even seems related to lobbying, you must coordinate with Zoom's Government Relations Department.

**i** For more information, see the [Social Media Policy](#) and the [External Communications Policy](#).

## 2.7 Human Rights

Zoom is committed to respecting and promoting fundamental human rights across its business operations and supply chain. Ethical business conduct and decision-making sits at the heart of our organization and we expect it of all Zoomies.

Zoom is against human trafficking and any form of modern slavery, involuntary labor, or unethical or abusive conduct. We expect the same of our suppliers and partners, including distributors, resellers, and other channel partners. If you become aware of any such issue or conduct (or the risk of it), you must report your concerns to Compliance and Ethics immediately.



## Caring for our Customers

### 3.1 Gifts and Hospitality

Business gifts and hospitality are meant to create goodwill and sound working relationships. Never use them to gain an improper business advantage or facilitate approvals from anyone, including government officials.

**Government Officials:** Unless you get express written pre-approval from Compliance and Ethics, do not give or accept gifts or hospitality involving government officials.

**Improper Business Courtesies:** When giving or accepting gifts and hospitality, Zoomies should take great care to avoid even the appearance of impropriety. Some gifts and hospitality are always inappropriate. For example, never give or accept gifts or hospitality that:

- are meant to influence anyone improperly, including to win or retain business, whether a government official, commercial customer or potential customer, or anyone else;
- are in exchange for any favor or benefit;
- involve cash or cash equivalents (such as gift cards);
- are illegal;
- are not permitted by the recipient's employer (you are

responsible for understanding the rules applicable to the prospective recipient before offering any business courtesy); or

- could in any way embarrass Zoom if the fact of the gift became public.

**Active Sales Negotiations:** Gifts and Hospitality should not be offered to or accepted from existing or prospective customers with which Zoom is in active sales negotiations unless you get pre-approval from Compliance and Ethics.

**Procurement and Sourcing:** Gifts and Hospitality should not be accepted by Procurement and Sourcing Associates from current or potential vendors or suppliers unless you get pre-approval from the Head of Procurement and Sourcing and from Compliance and Ethics.

Do not accept gifts or hospitality if someone might reasonably think that it could affect your judgment or actions at work. Our customers, suppliers and the public at large should know that Zoomies' judgment is not for sale.

**i For more information, see our Anti-Bribery and Anti-Corruption Policy and our Gifts and Hospitality Policy. These policies apply everywhere in the world, even if a practice is considered "a way of doing business."**

### 3.2 Fair Dealing

We strive to outperform our competition fairly and honestly. We will outperform our competition by having superior products and services, not through unethical or illegal business practices.

You may not use or acquire proprietary information or trade secrets that were obtained improperly or try to obtain such things improperly yourself. Do not improperly try to get current or former employees of other companies (or anyone else) to give you confidential information. If you find yourself with information that could be a trade secret or other confidential information of another business or customer, or if you have any questions about this section of the Code, you must immediately consult your manager, Compliance and Ethics, or the Legal Department.

You are expected to deal fairly with our customers, employees, and anyone else with whom you have contact in the course of performing your job. Employees involved in procurement have a special responsibility to adhere to principles of fair competition when purchasing products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service, and reputation, and not based on special favors.

**i For more information, see our Procurement Policy.**

### 3.3 Competition

Zoom is committed to conducting business in compliance with the antitrust and competition laws to which we are subject. The purpose of those laws is to protect competition, innovation, and consumer choice so that consumers get the best products and services at the lowest price.

To facilitate compliance with competition laws, Zoom prohibits the following types of agreements, concerted practices, or understandings with a competitor, whether formal or informal, written or oral:

- Price fixing, customer or supplier allocation, market allocation, bid rigging, group boycotts, agreements to eliminate a competitor, agreements to eliminate quality, and agreements to limit capacity, production, or sales.
- Agreements with a second party regarding salaries or other terms of compensation, and agreements between employers not to hire (“no poach”) one another’s employees.

Additionally, the following is also prohibited, unless prior written approval is received from Zoom’s Legal Department:

- Information sharing: Discussion, providing, or receiving, whether formal, social or otherwise and whether bilaterally, in the context of industry associations or otherwise, of confidential or business sensitive information with those outside the Company, in particular with competitors. This includes information about prices, costs, profits, profit margins, production volumes, discounts, sales terms, tenders, bids or

quotes, customer or supplier relationships, business strategies and future business plans, among other topics. It also includes sensitive HR information, including wages, benefits, and other compensation.

- Resale Price Agreements: Agreements, formal or informal, that directly or indirectly establish or fix the price or other trading conditions at which or where a partner or other third party may resell a product or service.

Finally, Zoom expects employees to contact the Legal Department or Compliance and Ethics (which will refer the question to the Legal Department) before adopting any of the following practices, because they can create antitrust risk if shown to have a harmful object or effect on competition:

- Conditioning the sale of a particular product or service only if the purchaser agrees to buy another product or service (sometimes called “tying”);
- Requiring a significant portion of the market to deal exclusively with our company;
- Applying materially different trading terms to equivalent transactions (for example, charging equivalent customers different prices);
- Pricing below cost to harm a rival or drive them out of the market;
- Offering customers rebates or discounts that effectively prevent competitors from serving a significant portion of the market;
- Hoarding scarce resources or facilities;
- Non-compete and exclusive dealing arrangements;

- Selective distribution arrangements; or
- Restrictions to sales channels (e.g. restricting the resale of products via the internet).

Competition and antitrust laws impose severe penalties for certain types of violations, including criminal or administrative penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances, and competition law violations may also result in significant harm to our reputation and ability to do business as well as impede the validity and enforceability of our contracts. If you are not sure whether a course of conduct is okay under this Code, ask the Legal Department or Compliance and Ethics.

## Caring for our Company

### 4.1 Conflicts of Interest

Zoomies have a duty to act in the best interests of Zoom and not in our individual self-interest. A conflict of interest may exist where the interests or benefits of one person or entity conflict or appear to conflict with the interests or benefits of Zoom. Your decisions and actions related to Zoom should be based on the best interests of Zoom and not based on personal relationships or benefits, either for yourself or for others (such as a family member or an entity in which you or a family member have significant involvement, relationship, or financial interest). Zoomies or those associated with Zoom must never use or attempt to use their position with Zoom to obtain improper personal benefits.

Conflicts of interest include actual conflicts of interest (a real, existing conflict), potential conflicts of interest (a situation that may result in a conflict), and perceived conflicts of interest (a situation that appears to be a conflict, even if it is not). It is important to avoid even perceived conflicts of interest: they can damage Zoom's reputation and yours as much as actual or potential ones can.

There are many kinds of conflicts of interest.

Here are some examples:

- serving as a director, advisor, employee, or contractor for a company or nonprofit that has a business relationship with Zoom or is a competitor or potential competitor of Zoom;
- owning stock in a competitor, customer, partner, vendor, supplier, or acquisition target of Zoom, which may be perceived by others as causing you to choose the interests of the other company over the interests of Zoom, other than ownership of less than a 1% interest in any equity securities of a publicly traded company;
- influencing Zoom's decisions or business dealings for personal gain or to the benefit of a current or potential competitor, customer, partner, vendor, supplier, or other business entity in which you have a financial interest;
- engaging in a private financial transaction with another Zoomie that may interfere with your or another Zoomie's work for Zoom, without pre-approval from Compliance and Ethics, or that may constitute a violation of law or regulation;
- developing a personal relationship with a subordinate employee of Zoom, or with an employee of a competitor or customer (or potential competitor or customer) that might interfere with the exercise of impartial judgment and decisions;
- being aware of Zoom's plan to hire your family member, relative, or a person with whom you have a romantic relationship, for a position that directly or indirectly reports to you; and
- exploiting or taking advantage of business opportunities discovered through your position with Zoom or through your use of Zoom's property or information for personal gain, rather than for the benefit of Zoom.



Evaluating whether something is a conflict of interest can be difficult and may involve a number of factors. If you are aware of an actual, potential or perceived conflict of interest, do not engage in that activity and disclose the conflict right away. Please refer to our Conflicts of Interest Policy for more information.

We also abide by securities laws that govern conflicts of interest involving our executive officers and directors. Related party transactions must be approved by Zoom's Board of Directors or the Audit Committee of the Board of Directors, as required by applicable laws and regulations, and such approval shall not be deemed a waiver of this Code. For more information, please contact the Legal Department or Compliance and Ethics.

## 4.2 Insider Trading

Employees who have access to confidential (or "inside") information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. All nonpublic information about Zoom or about companies with which we do business is considered confidential information. To use material nonpublic information in connection with buying or selling securities, including "tipping" others who might make an investment decision on the basis of this information, is not only unethical, it is illegal. Employees must exercise the utmost care when handling material inside information.

**i** Please refer to our **Insider Trading Policy** for more detailed information, including restrictions on disclosing inside information to friends, family members, and others.

## 4.3 Confidential and Proprietary Information

One of our most important assets is our confidential information. Zoomies may learn of information about Zoom that is confidential and proprietary. You also may learn of information about Zoom before that information is released to the general public. Zoomies who learn of or have access to confidential information should take care to keep this information confidential. Confidential information includes non-public information that might be of use to competitors or harmful to Zoom or Zoom's customers if disclosed, such as business, marketing and service plans, financial information, including Zoom's actual cost to provide its products and services, product ideas, source and object codes, engineering ideas, designs and techniques, databases, customer and supplier lists, pricing

strategies, inventions, personally identifiable information pertaining to Zoom's employees, users, or other individuals (including, for example, names, addresses, telephone numbers, email addresses, financial account information, health and medical information, and social security numbers), and similar types of information provided to Zoom by Zoom's employees, users, suppliers, and partners. This information may be protected by patent, trademark, copyright, trade secret, privacy, and data protection laws.

In addition, because Zoom interacts with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information the same way that you are required to treat Zoom's confidential and proprietary information. Moreover, you must treat as confidential the fact that Zoom has an interest in, or is otherwise involved with, another company.

You must keep confidential and proprietary information confidential unless and until that information is released to the public through approved and authorized channels. Every Zoomie has a duty to refrain from disclosing confidential or proprietary information about Zoom or any other company that you learn while working here, until that information is publicly disclosed. You should also refrain from discussing confidential or proprietary information with outsiders and even with fellow Zoomies, unless they have a legitimate need to know the information in order to do their job. Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties.

You should also avoid accidentally disclosing confidential

or proprietary information and avoid discussing sensitive or proprietary information in public or semi-public places. Zoom emails, voicemails, and other communications are presumed confidential; as such, do not forward or share them outside of Zoom except where you need to for legitimate business reasons.

If you handle information protected by any Zoom privacy policy, you must handle that information in accordance with the applicable policy. Please see our Employee Handbook (for employees outside of the U.S., refer to your local Employee Handbook), [Community Standards](#), [Privacy Statement](#), and your Employee Confidentiality and Assignment of Creative Works Agreement, as applicable. The prohibitions in this section and applicable policies do not apply to the lawful reporting of waste, fraud, or abuse related to the performance of a government contract to the appropriate government investigative or law enforcement agency. Furthermore, notwithstanding the foregoing, Zoomies may disclose Zoom's confidential and proprietary information to third parties in the ordinary course of business, provided that such disclosure has been pre-approved in writing by the discloser's manager and such third party has entered into a non-disclosure agreement with Zoom with respect to such information.

#### 4.4 Assets and Intellectual Property

Zoomies are expected to safeguard our Company's assets and intellectual property. Our physical assets, such as office supplies, computer equipment, products, and buildings, should be used only for legitimate business purposes, although limited incidental personal use may be permitted. Zoomies may not personally use or misappropriate our intellectual property, including source code, technology, corporate name, any brand name, or other trademark owned or associated with Zoom.

Zoomies also may not, while acting on behalf of Zoom or while using Zoom's computing or communications equipment or facilities:

- access the internal computer system or other internal resource of another entity without express written authorization from the entity responsible for operating that resource (also known as "hacking"); or
- commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as "spam"), or access material, that if it were to become public, would embarrass you or Zoom (except as necessary and required in the fulfillment of job duties and with written authorization from your supervisor), trafficking in contraband of any kind, or espionage of any kind.

If you receive authorization to access another entity's internal computer system or other resource, you must make a permanent record of that authorization so that it may be retrieved for future reference, and you may not exceed the scope of that authorization.

Zoomies are also expected to respect the assets and intellectual property of others and refrain from misappropriating or misusing such assets. Source code is a form of intellectual property and its use must be tracked as required by the Legal Department, even if the source code is designated as open source.

If you learn of or suspect any misuse of Zoom's or another entity's assets or intellectual property, tell your manager or Compliance and Ethics immediately.

**i For more information about our policies governing the use of intellectual property and other assets, please refer to our Employee Handbook, [Community Standards](#), [Data Handling Principles](#), and [Corporate Network Policy](#), in addition to the obligations in your Employee Confidentiality and Assignment of Creative Works Agreement, as applicable.**

## 4.5 Accurate Business Records and Financial Integrity

Our Chief Executive Officer, Chief Financial Officer, and Chief Accounting Officer are our “senior financial officers” and are responsible for ensuring that disclosures in our periodic reports and other public communications comply with applicable laws and regulations.

Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees, and others with whom we do business. We also rely upon our records to prepare the periodic and current reports that we file with the SEC. Securities laws require that disclosures in these reports comply with applicable laws and regulations.

The integrity of our records and public disclosures depend upon the validity, accuracy and completeness of the information supporting the entries to our books of account, and that depends on you. Our corporate and business records must be accurate and honest. Do not make false or misleading entries under any circumstance. We require that:

- no record be created or entry be made in our books that hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- all books, accounts, and records that document our business activities or the disposition of our assets be accurate and fairly reflect the true nature of the relevant transactions or assets, in reasonable detail;
- transactions must be supported by appropriate and accurate documentation;
- the terms of sales and other commercial transactions must be reflected accurately in the documentation for those transactions and all such documentation must be reflected accurately in our books and records;

- employees must comply with our system of internal controls and cooperate fully with our finance and accounting department, as well as our independent public accountants and counsel, to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete;
- no employee may take or authorize any action that would knowingly make or cause to make our financial records or financial disclosure fall out of compliance with generally accepted accounting principles, the rules and regulations of the SEC, or other applicable laws, rules, and regulations; and
- no cash or other assets may be maintained for any purpose in any unrecorded or “off-the-books” fund.

These requirements apply with regard to all Zoom transactions, business activities, and assets, no matter their value.

**i** For more information, see the [Audit Committee Complaint Procedures](#) and our [Speak Up Policy](#).

## 4.6 Side Deals and Unauthorized Reselling

Zoom formally documents the terms and conditions of the agreements into which it enters. We do not permit agreements, promises, or commitments by or on behalf of Zoom with a customer or partner from whom revenue has been or will be recognized that is not written in the final executed agreement, quote, purchase order, or other document delivered to Zoom's Legal Department. Zoomies are prohibited from making oral or written commitments that create a new or modify an existing agreement, quote, or purchase order.

Zoomies are prohibited from enabling and facilitating the unauthorized resale of Zoom licenses or products to any third party. Zoomies who learn about unauthorized reselling are obligated to timely report it.

**i For more information, see the Revenue Recognition Policy and Sales Booking Policy.**

## 4.7 Careful Communications

Our brand is one of our most valuable assets, and Zoomies are responsible for protecting it by carefully and professionally communicating about our Company, products, services, and financials both internally and externally. Only designated and authorized spokespersons may make public-facing statements, and those statements must be accurate, reliable, and pre-approved by the Legal Department as required.

Communications with the media and requests to publish articles or speak about Company products and services must be pre-

approved by Corporate Communications. Marketing sponsorships and materials must be pre-approved by the Marketing and Legal Departments. Only Investor Relations or their designees may communicate with shareholders and the financial analyst community.

**i For more information, see our External Communications Policy.**

## 4.8 Social Media

Zoomies should be responsible in their use of social media to have conversations and build connections. We value the reputation you have helped us build and preserving it is vital to our business. As Zoom brand ambassadors, be sure that you have the authority to post as such. We expect you to use social media in a way that is respectful of others and directly aligns with our company values (Community, Customers, Company, Teammates, Selves). When posting about Zoom, take care to avoid representing your personal views as those of Zoom, and make sure people know you are a Zoomie when posting about Zoom's products and services or about a competitor's products and services. Also take care to avoid violating Company confidentiality, including by posting about new features, products, financial performance, or services that are not yet publicly disclosed, or anyone's privacy or confidentiality by posting personal information about others.

Even in your private life, Zoom may have an interest in what you post. This may arise if your post potentially violates the law, our Code, or our Company values. Do not post information about colleagues without their consent.

**i See the Social Media Policy and Employee Handbook for more information.**





## Caring for our Teammates and Selves

### 5.1 Respectful Workplace

A respectful workplace includes acting with truth and candor with one another, as well as following the law, our Code of Conduct and Company policies and values.

Zoom takes pride in our commitment to promoting a diverse, equitable, and inclusive workplace that values individual differences. Every Zoomie is accountable for creating and maintaining a welcoming and respectful work environment where people of all backgrounds and individual characteristics can thrive.

We are committed to providing equal employment and advancement opportunities and to prohibiting harassment involving our employees, potential employees, partners, investors, customers, and other stakeholders. We do not tolerate unlawful discrimination or harassment on the basis of race, color, creed, religion, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity or expression, national origin, ancestry, citizenship, age, physical or mental disability, legally protected medical condition, family care status, military or veteran status, marital

status, domestic partner status, sexual orientation, genetic information or characteristics, or any other basis protected by law. Zoom also prohibits discrimination and harassment based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.

**i** For more information, see our [Employee Handbook](#).

### 5.2 Safe and Healthy Workplace and Sustainability

We are committed to a workplace that is free from violence, and we prohibit conduct that could cause a Zoomie to feel threatened or unsafe. Just as our platform is a tool that helps our customers amplify their sustainability efforts, we also strive to minimize the environmental impact of our operations and products. We are committed to conducting our business in a manner that reduces our environmental footprint, conserves resources, and protects the environment and the health and safety of our teammates, customers, and the communities we serve.

**i** For more information, see our [Community Standards](#) and [Employee Handbook](#).

### 5.3 Substances in the Workplace

Zoom cares about our teammates' health and is committed to promoting safe and efficient working conditions. Zoomies are expected to avoid illegal or controlled substances that impair your ability to fully perform your job. Do not possess, use, solicit, distribute, or manufacture illegal drugs or substances in the workplace or while working.

**i** For more information, see our [Employee Handbook](#).

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