Slack Code of Conduct

Version: June 7, 2019
# Contents

ABOUT OUR CODE OF CONDUCT ........................................................................................................... 3

- Code Certification ................................................................................................................................. 4
- Waiver of Code Provisions ..................................................................................................................... 4

LABOR AND HUMAN RIGHTS ......................................................................................................... 5

- Diversity and Non-Discrimination ........................................................................................................ 5
- Prevention of Involuntary Labor and Human Trafficking ...................................................................... 5
- Workplace Health and Safety .................................................................................................................. 5
- Criminal Activity/Arrests .......................................................................................................................... 6
- Alcohol Use/Distribution/Possession/Impairment .................................................................................. 6
- Standards of Conduct ............................................................................................................................. 6

BUSINESS PRACTICES .................................................................................................................... 7

- Recognizing Conflicts of Interest ......................................................................................................... 7
- Working with Family Members and Others with Whom you have a Personal Relationship ........... 7
- Outside Work ......................................................................................................................................... 8
- Outside Advisory or Board Service ........................................................................................................ 9
- Investments and Business Interests ....................................................................................................... 9
- Corporate Opportunities ....................................................................................................................... 10
- Gifts and Entertainment .......................................................................................................................... 10
- Side Deals or Side Letters ...................................................................................................................... 11

COMPLIANCE WITH THE LAW ................................................................................................... 11

- Anti-Corruption, Bribery and Kickbacks ............................................................................................... 11
- Relationships with Government Officials .............................................................................................. 12
- Understanding Insider Trading ............................................................................................................ 13
- Handling Imports and Exports ................................................................................................................ 13
- Competing Fairly .................................................................................................................................... 14
- Fair Dealing ............................................................................................................................................ 14
- Third Parties .......................................................................................................................................... 14
- Financial Integrity, Records and Accounting ......................................................................................... 14
- Document Management and Retention ................................................................................................. 15
- Outside Audits and Investigations ......................................................................................................... 15
- Wage and Hour Laws ............................................................................................................................. 15

SLACK ASSETS, SYSTEMS, AND FACILITIES ........................................................................ 16

- Company Information .......................................................................................................................... 16
- Intellectual Property .............................................................................................................................. 16
- Third Parties’ and Previous Employers’ Information ........................................................................ 16
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Employee Information</td>
<td>17</td>
</tr>
<tr>
<td>Using Technology and Other Tools</td>
<td>17</td>
</tr>
<tr>
<td>Using Company Funds, Assets, and Technology Appropriately</td>
<td>17</td>
</tr>
<tr>
<td>Security: See Something, Say Something</td>
<td>17</td>
</tr>
<tr>
<td><strong>COMMUNICATION</strong></td>
<td>19</td>
</tr>
<tr>
<td>External Communications</td>
<td>19</td>
</tr>
<tr>
<td>Investors and the Media</td>
<td>19</td>
</tr>
<tr>
<td>Social Media</td>
<td>19</td>
</tr>
<tr>
<td>Speaking Events</td>
<td>19</td>
</tr>
<tr>
<td>Political Activities</td>
<td>20</td>
</tr>
<tr>
<td><strong>HOW TO RAISE QUESTIONS AND REPORT CONCERNS</strong></td>
<td>21</td>
</tr>
<tr>
<td>Your Responsibilities</td>
<td>21</td>
</tr>
<tr>
<td>Retaliation is Not Tolerated</td>
<td>22</td>
</tr>
<tr>
<td>Expectations for Slack Managers</td>
<td>22</td>
</tr>
<tr>
<td>Cooperating with Investigations</td>
<td>22</td>
</tr>
</tbody>
</table>
ABOUT OUR CODE OF CONDUCT

This Code of Conduct (the “Code”) of Slack Technologies, Inc. and its subsidiaries (collectively, the “Company” or “Slack”) outlines requirements for how we conduct business at Slack worldwide. It also helps us understand how our values impact the way we do business. Legal, ethical and socially responsible choices and actions are fundamental to our values, and this Code defines the standards in meeting those goals.

This Code has been adopted by our Board of Directors (the “Board”) and applies to every director, officer, employee, and independent contractor of Slack and its subsidiaries. Although Slack operates in many countries around the world and our colleagues are citizens of nations with varying laws, regulations, and customs, Slack’s commitment to conducting business according to the highest standards of ethical conduct applies across national boundaries. Therefore, all Slack employees, directors, and officers are required to read and comply with this Code. In addition, other persons performing services for Slack may be subject to this Code by agreement. This Code is not a contract of employment and it does not convey any specific employment rights or guarantee employment for a specific time. Slack reserves the right in its sole discretion to modify or eliminate any of the contents of this Code without prior notice.

To summarize the Code in one phrase: In all matters, use good judgment.

The Code is intended to be a very practical guide to handling situations that arise at Slack. The Code is not intended to and cannot address every situation or issue that you might encounter here. Inevitably there will be questions about how to apply and interpret the Code. Please read on for the ways you can get answers to questions about the Code or other situations at Slack. The Code is interpreted on a case-by-case basis, and every set of facts and circumstances is unique.

Every person can make a big difference, so it is vital to act with integrity and in accordance with local laws. Slack requires its global employees, independent contractors, consultants, and others who do business with Slack to comply with all applicable laws, rules and regulations when performing work.

It is always important to do the right thing. Referring to this Code and following Company policies, applicable laws, rules and regulations at all times will help enable you to make the right choices. However, if you ever have questions or concerns about a section of this Code, a Company policy, a law, rule, or regulation, you should contact Slack’s legal team (“Legal”) at #help-code-of-conduct.

Above all, this Code helps employees maintain the trust Slack has built with its customers,
employees and others who have a stake in the Company’s success. That trust is what helps Slack succeed every day.

**Code Certification**
Depending on your position at Slack, we may ask you to certify your knowledge of various facts each quarter, or on another periodic basis. Slack relies on certifications to record transactions, make legal and accounting determinations, and comply with laws. If you do not provide a certification or completely, honestly, and accurately complete a certification, you may be in violation of this Code. This might result in disciplinary action, which may include termination of your employment.

**Waiver of Code Provisions**
It is rare for anyone to be exempted from any part of this Code, regardless of seniority or position. Waivers may only be granted in a manner permitted by law, with review and approval by Slack’s General Counsel, and, if required under applicable regulations, review and approval by the Board or a committee of the Board, with public disclosure of any waiver to the extent required by applicable regulations.
LABOR AND HUMAN RIGHTS

Slack believes all workers deserve a fair and ethical workplace and must be treated with the utmost dignity and respect. Slack expects its own workforce, and those of the companies with which it does business, to uphold the highest standards of human rights.

Diversity and Non-Discrimination
Slack is committed to the principles of equal employment. We are committed to complying with all applicable laws providing equal employment opportunities, and all other applicable employment laws and regulations. In compliance with those laws and ordinances, it is our intent to maintain a work environment free from unlawful discrimination and harassment against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns and volunteers, based on their actual or perceived race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex (including pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), age, sexual orientation, AIDS/HIV status, weight and height, military and veteran status and any other consideration protected by law (collectively referred to as “protected characteristics”). Slack is dedicated to the fulfillment of this policy regarding all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions, and privileges of employment. We will not tolerate discrimination or harassment based upon these protected characteristics or any other characteristic protected by applicable law.

Prevention of Involuntary Labor and Human Trafficking
Slack and the companies with which it does business shall ensure that all work is voluntary. Slack is vehemently opposed to the trafficking of persons or use of any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Workplace Health and Safety
Slack is committed to providing the safest work environment possible. Our programs focus on general safety awareness and incident response. Follow all safety rules and report unsafe situations.
**Criminal Activity/Arrests**
Your safety is important to Slack. As a result, employee involvement in criminal activity during employment, whether on or off Company property, may result in disciplinary action including suspension or termination of employment, subject to the requirements of applicable law. Disciplinary action depends upon a review of all factors involved, including whether or not the employee’s action was work-related, the nature of the act, or circumstances that adversely affect attendance or performance. Any disciplinary action taken will be based on information reasonably available. This information may come from witnesses, police, or any other source as long as management has reason to view the source as credible. Disciplinary actions taken by Slack will not depend upon the disposition of any case in court.

**Alcohol Use/Distribution/Possession/Impairment**
Reporting to work or performing work while impaired as a result of alcohol consumption is prohibited. Lawful off-duty alcohol use, while generally not prohibited by this policy, must be moderate and reasonable and must not interfere with an employee's job performance. Please be especially mindful of this during Gather Hours and other Company-sponsored parties and events.

**Standards of Conduct**
We want to ensure that Slack is a place where workers can thrive. In order to assure the safety and security of our people and provide the best possible work environment, we expect workers to follow basic, common-sense rules of conduct that will protect everyone’s interests. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but we have provided the following examples of prohibited conduct to assist you:

- Falsification of employment records, employment information or other records;
- Recording the work time of another employee, allowing any employee to record another employee’s work time, or allowing falsification of any time record, whether yours or another employee’s;
- Theft or the deliberate or careless damage of any Company property or the property of any employee or customer;
- Use of Company materials, supplies, tools or products for personal reasons without prior permission from Company management;
- Abuse of Slack’s electronic resources (as more fully explained in the “Using Company, Funds, Assets, and Technology Appropriately” Policy);
- Possessing, distributing, selling, transferring or using or being under the influence of illegal drugs in the workplace;
- Use of alcohol in a matter which violates the “Alcohol Use/Distribution/Possession/Impairment” Policy;
• Provoking a physical fight or engaging in physical fighting during working hours or on premises occupied by Slack;
• Carrying firearms, weapons or dangerous substances at any time, on premises owned or occupied by Slack.
• Using abusive, violent, threatening or vulgar language at any time during working hours or while on premises owned or occupied by Slack;
• Failing to observe working schedules, including meal and rest breaks;
• Violating any safety, health or security policy, rule or procedure of Slack; and
• Committing a fraudulent act or intentional breach of trust under any circumstances.

Although employees and/or Slack may choose to end their employment relationship at any time and for any reason, without following any formal system of discipline or warning, we may exercise discretion to utilize forms of discipline that are less severe than separation for conduct violations. Examples of less severe forms of discipline include verbal warnings, written warnings, demotions and suspensions. Although one or more of these forms of discipline may be taken, no formal order or procedures are necessary. Slack reserves the right to determine which type of disciplinary action to issue in response to any type of performance issue or rule violation.

BUSINESS PRACTICES

Recognizing Conflicts of Interest
A conflict of interest is a situation where an opportunity for personal gain may be contrary to the Company’s best interests.

Avoid even the appearance of a potential conflict of interest. If you believe that you may have a potential conflict of interest, discuss it with your manager right away. Your manager and Legal can help you work out a way to manage the conflict. Remember, it is your responsibility to act appropriately until the situation has been addressed.

Working with Family Members and Others with Whom you have a Personal Relationship

Slack believes that a work environment where employees maintain clear boundaries between their personal and business interactions is most effective for conducting business and enhancing productivity. Notably, this policy does not prevent the development of friendships or
romantic relationships between co-workers. However, it does establish boundaries as to how intimate and family relationships are conducted during working hours and within the work environment.

A familial or intimate relationship among employees can—under certain circumstances—create an actual or at least potential or perceived conflict of interest in the employment setting, especially where one relative, spouse, partner, or member of such a relationship supervises another relative, spouse, partner, or member. We will not take any adverse employment action against any employee for engaging in intimate relationships during non-working hours away from Company premises. However, we will consider such intimate relationships when they affect an employee's job performance, occur during working time or on Company premises, or pose a danger of a conflict of interest; familial relationships will receive the same consideration.

Thus, Slack employees are not permitted to report to someone who is a family member, or someone with whom they are intimately involved. If two employees marry, become related, or enter into an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. Slack will attempt to identify other available positions. If no reasonable alternative position is available or satisfactory to both Slack and the employees, one employee may be required to resign.

In other cases where a conflict or the danger of a conflict arises, even if there is no supervisory relationship involved, the parties may be separated from employment or reassigned, at the discretion of Slack. To further avoid any conflicts of interest, Slack may refuse to hire or place a relative or other intimately associated individual in a position where the potential for favoritism or a conflict exists. All Slack employees in a romantic, sexual, or familial relationship with another Slack employee must disclose the existence of the relationship to their People Partner.

For the purposes of this policy, a relative or familial relationship refers to any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage (e.g., parent, sibling, spouse, child, in-law, grandparent, grandchild, step-relative, or domestic partner). An intimate relationship refers to a relationship between people who are romantically involved.

**Outside Work**

You are the most important resource that we have at Slack. Your time and energy impact the value we have as an organization, and your colleagues depend on you to work as hard as they do.

You are expected to devote your full professional energies to your work at Slack, and any outside activities cannot interfere with your job at Slack.

Do not:

- Use any work time, equipment, or materials for any non-Slack job, business, or inventions. This includes using Slack workspace, computers, Internet access, copy machines, and any other Slack assets or services.
• Use your position at Slack to solicit work for your outside business or other employer, to obtain favored treatment, or to pressure others to assist you in working on your business.

• Participate in an outside employment activity that could have an adverse effect on your ability to perform your duties at Slack.

• Use confidential Slack information to benefit your other employer, outside business, or invention.

You must inform your manager and Legal before you take on any outside employment that might cause a potential conflict. You can contact Legal regarding such matters by posting in the #help-code-of-conduct channel.

Outside Advisory or Board Service
Slack encourages everyone to participate in non-profit activities, consistent with our commitment to giving back to our communities.

For any non-profit activities that do not involve board membership, but that would conflict with or could conflict with Slack’s business, Slack employees must obtain approval from their manager and Legal. You can contact Legal regarding such matters by posting in the #help-code-of-conduct channel.

If you have been asked to sit on the Board of Directors of such a non-profit organization, you might also need to get approval from our General Counsel, as further explained in the adjacent example.

Investments and Business Interests
Many Slack employees have investments in publicly-traded stock or privately-held businesses. In general, these are fine, but investments might give rise to a conflict of interest if you are involved in or attempt to influence transactions between Slack and the business at issue. Financial interests that pose a potential conflict of interest require approval from your manager and our General Counsel. If a real or apparent conflict arises, disclose the conflict to Slack’s General Counsel.

Example:

**Question:** May I serve on the board of directors of an outside enterprise or organization?

**Answer:** (1) Before accepting board positions on non-profit organizations that do not relate to Slack’s present or reasonably anticipated business, employees must obtain written permission from both their manager and a Director-level manager on their team. (2) Before accepting board positions on non-profit organizations that do relate to Slack’s present or reasonably anticipated business, employees must obtain written permission from their manager and Legal. (3) Before accepting board positions on for-profit organizations that do or do not relate to Slack’s present or reasonably anticipated business, employees must obtain written permission from their manager and Slack’s General Counsel. Executive Team members must obtain permission from the CEO or General Counsel before accepting such positions. When in doubt, please post your question in the #help-code-of-conduct channel, for Company review and guidance.
via the #help-code-of-conduct channel.

If you, a relative, or a member of your household (including a roommate) is considering investing in a Slack supplier, customer, or competitor, take great care to make sure that the investment does not compromise your obligations as a Slack employee. Things to consider in determining whether there is a real or seeming conflict:

- The size and nature of your investment;
- Your ability to influence Slack’s decision;
- Your access to Slack’s confidential information; and
- The nature of the relationship between Slack and the other company.

Corporate Opportunities
Slack officers, directors and employees are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate information or position, unless the opportunity is disclosed to and pre-approved by the Legal team. No officer, director or employee may use Company property, information or position for improper personal gain, and no officer, director or employee may compete with the Company directly or indirectly. Officers, directors and employees owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises. These opportunities include, for example, inventing products or services and writing books.

Gifts and Entertainment
This policy applies to both giving and receiving gifts or other things of value as part of your job at Slack. Gifts are usually goods or services, but can be any item of value, including entertainment (such as tickets or invitations to concerts, sporting events, etc.). Exchanging gifts and entertainment can help build strong working relationships with customers and other business partners. In some cases, however, gifts and entertainment may create a conflict of interest or unfair bias that could influence business decisions or be seen as bribes. Employees may not give or receive gifts or entertainment to or from current or potential vendors, suppliers, customers, or other business associates unless all of the following conditions are met:

- **Customary.** The item is a customary business gift and would not embarrass Slack, if publicly disclosed. Cash is never an acceptable gift. Giving or receiving cash is viewed as a bribe or kickback and is always against Slack policy.

- **No favored treatment.** The purpose of the gift is not to obtain special or favored treatment.

- **Legal.** Giving or accepting the gift is legal in the location and under the
circumstances where given.

- **De Minimis Value.** Generally, if your gift does not involve a government official, a gift whose value is de minimis is permissible.

- **Recipient is not a government official.** Never provide a gift, including meals, entertainment, or other items of value, to a U.S. or foreign government official without obtaining approval from Legal in advance. See the Relationships With Government Officials Policy below.

Make sure you know the Company’s policies in this area. See Slack’s Anti-Corruption Policy for further information on the Company’s gifts policies. Any questions regarding whether a gift is appropriate irrespective of value should be directed to Legal via the #help-code-of-conduct channel.

### Side Deals or Side Letters

All the terms and conditions of agreements entered into by Slack must be formally documented. Contract terms and conditions define the key attributes of Slack’s rights, obligations, and liabilities and can also dictate the accounting treatment given to a transaction. Making business commitments outside of the formal contracting process, through side deals, side letters, or otherwise, is unacceptable. You should not make any oral or written commitments that create a new agreement or modify an existing agreement without approval through the formal contracting process.

### COMPLIANCE WITH THE LAW

#### Anti-Corruption, Bribery and Kickbacks

Never resort to bribery, facilitation payments, kickbacks or other corrupt practices. There is no potential benefit that can justify damaging our integrity and reputation or the trust others place in us. All bribery is prohibited. All Slack employees and our business partners must fully comply with the Foreign Corrupt Practices Act ("FCPA") and other applicable laws prohibiting the bribing of public officials or individuals in the private sector (such as the U.K. Bribery Act). Even though the FCPA is a U.S. law, it applies to our actions everywhere.

- **Bribery** is offering or giving something of value in order to improperly influence the recipient’s actions. Bribery is illegal in every jurisdiction in which Slack does
business, and the consequences can be severe, including prison time.

- A facilitation payment is a tip or small payment made to a government official in order to expedite a routine government action, such as issuing a permit or providing utility service. This is illegal in most jurisdictions and not allowed by Slack.
- A kickback is the return of a sum paid (or due to be paid) as a reward for fostering a business arrangement. Accepting or offering a kickback violates this Code.

Please refer to the Anti-Corruption Compliance Policy for additional information.

### Relationships with Government Officials

If you interact with government officials on Slack's behalf, be particularly careful about gifts, meals, and entertainment. Laws and regulations governing what companies can give to government officials are very strict, including in the U.S. Be sure you know what the rules are. Contact Legal before offering or providing any gifts, meals or entertainment to government officials. All interactions with government officials that are not sales-related require the oversight of Legal.

A government official is any officer or employee of a government or any department, agency, instrumentality or public international organization, or any person acting in an official capacity for or on behalf of such person. Government officials also include any: (i) officer, employee or person acting in an official capacity on behalf of a political party; (ii) a candidate for political office; (iii) an officer or employee of a state-owned or state-controlled company, regardless of the officer’s or employee’s rank or title; (iv) uncompensated honorary officials who have influence in the award of business; (v) members of royal families; (vi) any entity hired to review or accept bids for a government agency; (vii) officials, whether elected, appointed or under a contract, permanent or temporary, who hold a legislative, administrative, or judicial position of any kind in a country or territory; (viii) any person who performs public functions in any branch of the national, local, or municipal governments of a country or territory or who exercises a public function for any public agency or public enterprise of such country or territory; and (ix) spouses and other

### Examples:

**Question:** I own stock in companies that do business with Slack. Is this a problem?

**Answer:** Probably not. However, it could be a concern if you are influencing a transaction between Slack and the other company, or the transaction is significant enough to potentially affect the value of your investment.

**Question:** Does Slack’s Code of Conduct apply to new stock transactions involving other companies?

**Answer:** Yes. For example, say you learn about a customer’s nonpublic expansion plans through discussions about a Slack subscription purchase. If you purchase stock in the customer’s company or advise others to do so, it likely is illegal insider training and a breach of your duty of confidentiality to Slack.
immediate family members of any of the persons listed above.

**Understanding Insider Trading**

While working at Slack, you may learn information about Slack, our customers, partners, or other third parties that is confidential. Trading a public company’s stock while in possession of material information that is not known to the public is illegal and prohibited by our policies. Consequences for violations are severe, including jail time.

Information is *material* if a reasonable investor would consider it important in deciding whether to buy or sell a company’s securities.

Information that is material and is not available to the public is called *inside information*. Common examples of inside information include key changes in management, mergers and acquisitions, other major business plans and financial results that have not been released outside the company.

You cannot give inside information to anyone else, either. This is known as *tipping*, and is also illegal and prohibited by our policies.

The bottom line is: at Slack, no one may buy or sell securities based on inside information, and no one may tip off others to do so. It does not matter how we learned it—using material nonpublic information to make a trade is never acceptable. It violates the law and the trust we have built with our fellow employees, our users, customers, partners, and investors. You are required to keep all customer information, whether or not material, confidential. Please refer to the full Insider Trading Policy for additional information.

**Handling Imports and Exports**

When working with international customers, keep in mind that there may be additional steps required before delivering products or services internationally. Many countries periodically impose restrictions on exports and other dealings with certain countries, persons, or groups. Export laws may control trading of commodities or technologies. Laws may cover travel to or from a sanctioned country, imports or exports, new investments, and other related topics. Certain laws also prohibit support of boycott activities.

Slack employees are responsible for knowing and following the appropriate rules and procedures for imports and exports. If you are involved in international transactions, you must know what is expected of the Company, including any requirements related to taxes, verification, licensing and permits. Please contact Slack’s General Counsel via the [#help-code-of-conduct](https://slack.com) channel with any questions.
Competing Fairly
Agreements with competitors are subject to rigorous scrutiny in all countries. Competitors are expected to compete, and compete aggressively, on all terms. Agreements with our customers and suppliers can also give rise to scrutiny, particularly if Slack has a leading position in the market. Laws prohibit agreements that would restrain trade. A few common—and illegal—examples include:

- Price fixing, where competitors or partners agree to charge a certain price for certain products or services.
- Bid rigging, where competitors agree among themselves to bid in a way that allows a certain bidder to win.
- Dividing or allocating markets, where competitors agree to limit their sales presence so that each company can be the only available choice for buyers in a given market.
- Boycotting, where competitors agree to avoid a particular customer or supplier.

Keep in mind that agreements do not have to be signed contracts to be illegal. An informal understanding between you and a competitor, or even a conversation that implies an understanding, may be a problem. If any of these topics come up while you are talking with a competitor, stop the conversation immediately and report it to the Legal team.

Fair Dealing
Slack is committed to being honest and truthful with all of its customers, vendors, and other business partners. Never misrepresent the quality, features or availability of our products, and never do anything illegal or unethical to win business.

Trying to obtain information by lying or pretending to be someone you are not is unethical and could be illegal. Do not do it. And if you receive another company’s confidential or proprietary information by mistake, return or destroy it. You may also reach out to the Legal team if you have questions.

Third Parties
Slack engages with third parties such as agents, consultants, suppliers, resellers, or distributors, only after they have passed a legal due diligence process. In the course of performing your job, you might need to disclose confidential Slack information to such third parties. Such disclosure should only occur after you ensure that there is a non-disclosure agreement ("NDA") in place which has been approved by the Legal team.

Financial Integrity, Records and Accounting
Slack’s books, records, accounts and financial statements must be maintained in appropriate detail so that they properly reflect the Company’s business activities. Doing so is required both by law and by the Company’s internal controls. Our financial,
accounting and legal groups are responsible for procedures designed to assure proper internal and disclosure controls, and everyone must cooperate with these procedures to ensure the integrity of the Company’s books, records, accounts and financial statements.

All information must be recorded accurately, whether it is tracking work hours, expenses (including your expense reports) or sales contracts. When these are timely and accurate, we are able to make informed decisions about how to run our business and plan for the future. Our records, including disclosures and filings, must be accurate, complete and timely, so that Slack fulfills its obligations to external stakeholders, including its stockholders.

**Document Management and Retention**

When deciding which documents or data to save, archive or delete, always use good business judgment and comply with applicable Company retention policies.

You may be notified that “legal hold” has been placed on documents or data in your possession or in various Slack channels. If this happens, please review the legal hold notice carefully. If you have any questions about the notice and what you should do, please contact Legal. Importantly, never alter, conceal or destroy any documents or data subject to a legal hold.

**Outside Audits and Investigations**

From time to time, Slack employees may encounter internal and external auditors, attorneys, or investigators who request information from you as authorized by Slack. You are required to provide these individuals with timely and accurate information. Never mislead or attempt to influence any investigation, audit or inquiry.

Like every company, Slack sometimes receives requests for information from national or local government officials. If they contact you, be sure to notify Legal for assistance in handling the request promptly, accurately and completely.

**Wage and Hour Laws**

Slack is committed to following all applicable wage and hours laws and regulations. To help ensure that all work performed for us is compensated correctly, employees who are compensated on the basis of hours worked must report and record time accurately in accordance with Company procedure.
SLACK ASSETS, SYSTEMS, AND FACILITIES

Company Information
Many details about how we operate need to be kept confidential in order for us to remain competitive and successful.

Employees are responsible for safeguarding all confidential and sensitive data such as:

- Business plans and strategies
- Financial results
- Product designs and concepts
- Sales goals and marketing plans
- Terms and conditions and fees paid by customers
- Financial data
- Other non-public data that might be of use to competitors

For detailed information about how to protect information and what your specific responsibilities are, view our information security policies here.

Intellectual Property
Slack depends on good ideas, so it is important to protect those ideas through legal tools such as copyrights and patents. Collectively, this intangible property is called intellectual property (“IP”), and it includes all copyrights, patents, trademarks, trade secrets, design rights, logos and brands. Keep in mind that Slack owns the rights to all IP created with Company materials or on Company time. Please refer to your respective contractual obligations with Slack concerning IP, including but not limited to a proprietary information and inventions agreement.

Third Parties’ and Previous Employers’ Information
In some cases, employees may be responsible for protecting information that belongs to other people or companies.

- Third parties: In the course of doing business, sometimes employees will learn confidential information about customers, suppliers and other business partners. Protecting and keeping strictly confidential the data of these third parties is one of Slack’s most important duties. In addition, you are not permitted to accept or use any third party’s confidential information.
- Former employers: You are not permitted to bring any materials or information from a prior employer to Slack. When a new team member joins Slack, employees must respect that this person cannot share confidential information about previous employers. Similarly, you are still responsible for protecting Slack’s information if you leave the Company.
**Personal Employee Information**

Personal information provided to the Company must be protected.

If your job enables you to have access to employees’ personal information (data like home addresses, medical information, Social Security numbers, compensation), you are responsible for helping to protect it and keeping it strictly confidential. That means using the information only for legitimate business purposes and never sharing it with anyone who does not have a work-related reason to see it.

**Using Technology and Other Tools**

We trust our employees with a wide range of technology and other tools that make it possible to do their jobs effectively, and these tools must be used wisely.

**Using Company Funds, Assets, and Technology Appropriately**

Any computers and other devices that Slack provides are Company property. The same is true of our Slack instance, our email system and Internet access. A certain amount of personal use is permitted, but Company technology should mainly be used for business purposes.

Since all of these tools and technology belong to the Company, employees should not have any expectation of privacy in their use. Slack may monitor anything created, stored, sent or received on Company technology, to the extent allowed by law. Do not use Company technology to violate the law or Slack policies or to create, store or send content that others might find offensive.

It is also important to carefully avoid any usage that might lead to loss or damage, such as a breach of the Company’s IT security protocols.

Company property also includes Slack’s brand and reputation, funds, facilities and employee work time.

**Security: See Something, Say Something**

You are Slack’s first line of defense. If you see something suspicious, say something by reporting safety and security concerns to our reception team. Suspicious network activity or emails should be reported to the security team. Reporting helps Slack keep our people and our brand safe while defeating attacks faster to minimize or prevent damage.

---

**Example:**

**Question:** May I occasionally use my Slack email address for my outside business?

**Answer:** You may never use your Slack email for an outside business.

**Question:** What if my veterinarian emails me with an update about my pet, and I need to respond utilizing work internet access.

**Answer:** Non-excessive use of Slack email for personal purposes is fine.
The security of our premises and property is the shared responsibility of all employees. Proper access credentials must be visibly displayed by employees, contractors and visitors at all times while on Slack premises. No one should be granted access into our premises without a valid credential. View our physical security policies here.
COMMUNICATION

External Communications
Slack has an open and transparent culture, and our communication policies govern how we communicate to the public responsibly. Please see the Corporate Communications Policies and Procedures for additional information affecting external communications.

Investors and the Media
All inquiries from the media must be directed to the Public Relations Team. If you have any questions, contact pr@slack.com. Similarly, inquiries from investors or the investment community must always be directed to the Finance Team. You can find our complete media engagement policies here.

Social Media
We have a Social Media Policy that goes into more detail about what employees can and cannot do on social media, but in general, remember that the Internet is a public place and never forgets anything, so handle yourself accordingly. Some dos and don’ts for employee include:

- Protect Slack’s proprietary information.
- Do not comment on legal matters, trade secrets or disclose confidential information.
- If you are discussing Slack or our products, be open about the fact that you work for us.
- Be very mindful when mentioning customers or prospects, because they may be listening and associate your comments with Slack.
- Be clear that your statements are your own opinion, not those of Slack, but be mindful that people may associate what you say with Slack because you work here.
- Generally represent yourself well and use your best judgment at all times.

Example:

**Question**: If I am an employee and I make a presentation on my own time, may I accept a payment?

**Answer**: That depends. If you are representing Slack, you may not accept payment. If you are on your own time and are not representing Slack, you may be allowed to accept payment. Before accepting this type of opportunity check with your manager, People Partner, or post in #help-code-of-conduct.

Speaking Events
If you are an employee, and you have been invited to speak or present at an event and are representing Slack when you do so, you must notify the Public Relations Team before accepting and have them review and approve any materials you present or discuss. Refer to the Speaking Engagement Policy for full process and details. Before accepting free travel or accommodations, check that the proposed gift is within the gift rules or ask Legal for approval.
Political Activities

Slack does not make political contributions to individual candidates or parties. However, Slack employees are encouraged to be involved in the political activities of their choice. Slack employees should be clear in such activities that their participation is their own choice and that the views they advocate are they own not necessarily those of Slack.

- Slack has historically allowed limited political activity in internal Slack channels, but the use of Company time, facilities or resources for personal political activities is subject to revocation if abused or if it becomes too much of a distraction for employees or the Company.
- If you are involved in lobbying, make sure you know the rules.
- Contact Legal if you anticipate making a large political contribution as employee, even as an individual, to ensure compliance with disclosure laws relevant to the Company.

Slack’s workforce is a big community made up of individuals with diverse beliefs and viewpoints. You should respect everyone’s opinion, especially when you disagree with it. You are not permitted to attempt to impose your personal beliefs or opinions on others.

Employees may keep their personal activities outside of Slack confidential, but always keep in mind that you are a representative of Slack. Your conduct can affect the perception of Slack. You cannot have personal activities that conflict with or interfere with your job duties at Slack.
HOW TO RAISE QUESTIONS AND REPORT CONCERNS

We promote an environment that fosters honest, good faith communications about matters of conduct related to our business activities, whether that conduct occurs within Slack, involves one of Slack’s contractors, suppliers, consultants, or customers, or involves any other party with a business relationship to Slack. Consistent with our commitment to ethics, compliance, and the law, we welcome your good faith questions and concerns about any conduct you believe may violate our Code, especially conduct that may be illegal, fraudulent, unethical, or retaliatory.

If you are not sure how to handle something, or if you think there is a problem, speak up! No matter how small the issue is, we want to hear from you. We cannot fix issues we do not know about.

Your Responsibilities

Slack’s Code of Conduct and its principles apply to our global employees, independent contractors, consultants, and others who do business with Slack. You are required to:

- **Follow the Code.** Comply with Slack’s Code of Conduct, principles, and review any applicable legal requirements with counsel.

- **Speak up.** If you have knowledge of a possible violation of Slack’s Code of Conduct or its principles, other Slack policies, or legal or regulatory requirements, you must notify Slack. Slack employees may make such reports through their manager (provided their manager is not involved in the violation), the People Team, Legal, or any other mechanism outlined in their applicable employee handbook. Anyone (including employees, independent contractors, consultants, and others who do business with Slack) may also report Code violations through Slack’s EthicsPoint Hotline. EthicsPoint reports may be made online at https://secure.ethicspoint.com/domain/media/en/gui/51295/index.html; or by calling the EthicsPoint Hotline at 1-844-727-0825. Please note that you may be able to submit any reports to EthicsPoint anonymously, if the laws of your jurisdiction permit.

- **Use good judgment.** Apply Slack’s principles of business conduct, review our policies, review legal requirements, and then decide what to do.

- **Ask questions.** When in doubt about how to proceed, discuss it with a Slack manager, People Team representative, or Legal. If you need more support or have questions, contact the #help-code-of-conduct channel.

Failure to comply with Slack’s Code of Conduct, or failure to report a violation, may result
in disciplinary action up to and including termination of employment or the end of your working relationship with Slack.

**Retaliation is Not Tolerated**
Slack will not retaliate—and will not tolerate retaliation—against any individual for filing any good-faith complaint with Slack or through EthicsPoint, or for participating in the investigation of any such complaint.

**Expectations for Slack Managers**
While this Code applies to everyone at Slack equally, employees in a managerial role have extra responsibilities.

Most specifically, you must report matters that may indicate a violation of the Code or any other Company policy to the People Team or Legal.

If you are a manager, you are in the best position to set the right tone for your team, including by doing the following:

- Lead by example, always choosing the right course of action.
- Speak up when you see a problem and encourage others to do the same
- Make sure your direct reports understand the Code and what is expected of them.
- Always be receptive to questions, concerns or comments, and make sure that issues are directed to the people at Slack who can help.

**Cooperating with Investigations**
Slack will conduct investigations of all alleged or actual violations of our policies, procedures, and laws. All employees and business partners are required to cooperate with any Slack investigation. You must take your participation in any investigation seriously. The following actions will result in disciplinary action, including possible termination of employment:

- Failing to provide evidence when requested;
- Providing false or misleading information in an investigation;
- Not fully cooperating with an investigation; or
- Not following instructions related to an investigation (for example, discussing the investigation with other employees if you are instructed not to).