



# SUPPLIER CODE OF CONDUCT

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# Introduction

At Twilio, we are guided by Twilio Magic, the principles we use to build an impactful, high-growth business while staying true to ourselves. We are committed to conducting business ethically and legally across all our global operations, and we expect our business partners to share in this commitment. Our Supplier Code of Conduct (the “**Supplier Code**”) sets out expectations for our business partners in the areas of business integrity, labor practices, anti-corruption, health and safety, and environmental impact. Twilio is committed to protecting human rights and strives to develop environmentally and socially sustainable chains of responsibility within our sphere of influence.

Twilio expects the business partners that we work with, including all vendors, consulting firms, staffing agencies, agency temps, partners and licensees (“**Suppliers**”), to adhere to the high standards set forth in this Supplier Code as a condition of doing business with Twilio. If you suspect illegal or unethical practices, it is your responsibility to report it to Twilio and local authorities.

## Compliance with the Supplier Code

Suppliers shall abide by, and Suppliers shall require any subcontractors, providers, or agents that they use to abide by, (i) all applicable laws, regulations and other legal requirements in jurisdictions in which they operate and (ii) the Supplier Code.

## Reporting Misconduct

We expect Suppliers to strive to act honestly, directly and transparently in all aspects of business. Part of conducting business with Twilio includes compliance with this Supplier Code. We have the right to terminate business with a Supplier who fails to adhere to the Supplier Code. If it is determined a Supplier does not adhere to the Supplier Code, they must correct their actions. To promote a high standard of ethical and professional conduct, we have an ethics reporting hotline, where, as permitted by law, employees, contingent workers, contractors, customers and Suppliers can address any issues on a confidential and anonymous basis. Suppliers should report any known or suspected violations of the Supplier Code, laws, or regulations to Twilio’s Ethics Helpline +1-844-637-6752 or website [www.twilio.ethicspoint.com](http://www.twilio.ethicspoint.com). Any questions regarding the scope or compliance with the Supplier Code may be directed to [ethics@twilio.com](mailto:ethics@twilio.com).



# Human Rights And Labor Compliance Standards

We believe that unleashing human potential – both inside and outside our company – is the key to our success. Invest in each other.

## General Rights of Workers

Twilio acknowledges and respects basic and fundamental human rights. Suppliers shall treat workers with dignity and respect as understood and defined by the International Labor Organization, United Nations Declaration of Human Rights, and any applicable law. Suppliers shall make all relevant information about their employees' rights easily accessible to the employees.

## Humane Treatment

Twilio requires its Suppliers to ensure there is no inhumane treatment or threat to workers, including any violence (gender-based or otherwise), corporal punishment, mental or physical coercion, harassment (sexual or otherwise), unreasonable restrictions on entering or exiting work and residential facilities, arbitrary arrest or detention, bullying, shaming, threats of any of the foregoing or any other forms of intimidation. Suppliers must treat all workers with dignity and respect.





### **Health and Safety**

We expect Suppliers to provide all employees with safe and healthy working conditions that comply with local laws. Safe and healthy working conditions include offering emergency training and resources, practicing industrial hygiene, and enacting equipment safety initiatives, as appropriate. Suppliers should take proactive measures to prevent workplace hazards.

### **Labor Practices**

Twilio recognizes that our business decisions have a direct impact on people and communities. We are committed to enacting fair labor practices and expect Suppliers to share that commitment.

### **Fair Compensation**

Twilio requires Suppliers to comply with the local minimum wage laws and benefits requirements. Additionally, Suppliers should not unlawfully use deductions from wages as a disciplinary measure.

### **Working Hours, Rest Days, and Compensation**

Twilio expects its Suppliers to ensure their workers have reasonable work schedules that comply with local laws. While it is understood that overtime may be required, Twilio expects Suppliers to carry out their services in a way that promotes humane and productive working conditions. Suppliers shall comply with local laws regarding payment and working hours, including overtime, rest days and public holidays. Compensation paid to employees shall comply with all applicable local wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

### **Freedom of Association**

Open communication and direct engagement between workers and management are effective ways to resolve workplace and compensation issues. Twilio requires that you respect employees' right to freedom of association, collective bargaining and to form and join a labor union of their choosing in accordance with local laws. Suppliers will not unlawfully discriminate in employment decisions against or engage in threatening or harassing behavior towards workers because of their affiliation with worker groups.

### **Child Labor**

We do not tolerate the use of child labor and will not work with suppliers that utilize child workers. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers must monitor any and all employees under the age of 18 to ensure they are performing age-appropriate tasks, in age-appropriate working conditions, and are protected from any type of labor likely to jeopardize their health or safety.

### **No Forced Labor or Human Trafficking**

Twilio condemns human trafficking and forced labor and will not work with Suppliers who engage in these practices. Suppliers must ensure that they do not use involuntary prison labor, or forced, bonded, or indentured labor, and do not employ anyone against their will. We expect Suppliers to adhere to all applicable anti-modern slavery and human trafficking laws, including the UK Modern Slavery Act 2015. Workers shall not be required to relinquish control of identity or immigration papers (including but not limited to passports, drivers' licenses, or work permits). Additionally, Suppliers must ensure that all work is voluntary and that their

employees are free to resign their employment in accordance with applicable law. Workers shall not be required to pay employers' agents' or sub-agents' recruitment fees or other related fees for their employment.

### **Grievance Procedures**

We require Suppliers to offer reasonable procedures so that their employees can bring workplace concerns to management.





# Environmental And Community Impact

We believe in thinking long term and recognize that environmental sustainability is critical to succeed as a business and a community. Twilio expects Suppliers to share in this commitment by responding to challenges posed by climate change and working toward protecting the environment.

## Environmental Protection

We expect our Suppliers to follow all applicable environmental laws, regulations, and standards. This includes requirements for chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. Suppliers are encouraged to develop and maintain business practices to promote energy efficiency, reduce pollution (including greenhouse gas emissions), and conserve resources.

Twilio has committed to set science-based emissions reduction targets—across the entire value chain—that are consistent with keeping global warming to 1.5 degrees Celsius (1.5°C) above pre-industrial levels. As part of these targets, we have committed that the majority of our Suppliers by emissions will commit to set science-based targets by 2027. Therefore, we seek to work with Suppliers that have publicly committed to or set a science-based

target to reduce greenhouse gas emissions in line with the guidelines of the Science-Based Target initiative.

## Community Impact

Twilio strives to promote the well-being of the communities in which Twilio does business. We believe that social responsibility supports our success as a business. Through Twilio.org, our social impact arm, we believe that we fuel communication that gives hope, power, and freedom. Suppliers are encouraged to actively engage the communities in which they do business to promote sustainable social and economic practices and development. Suppliers should assess the potential impact of their activities on the local community and take steps to mitigate and avoid any negative impacts on the environment and community.



## Respectful Workplace

Twilio is intentional about prioritizing equality of opportunity, upholding the rights of workers, and treating workers with dignity and respect, and Twilio expects the same from Suppliers. Twilio expects that all Suppliers provide a workplace that is free of harassment, discrimination, and retaliation in accordance with local law for all workers.

- **Non-Discrimination.** Consistent with applicable law, Suppliers may not engage in any discriminatory practices in hiring, compensation, access to training, promotion, termination, and/or retirement based on race, color, sex, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or veteran status.
- **Respect and Dignity.** Suppliers shall provide a working environment that is free of abusive, violent, threatening, disruptive, demeaning, and other improper behavior. Suppliers will not tolerate harassment and other disrespectful conduct, including sexual harassment, discrimination, and bullying. Suppliers are expected to refrain from corporal punishment, threats of violence or other forms of physical coercion.
- **Accommodations.** Suppliers will provide reasonable disability, religious, or pregnancy-related accommodations consistent with applicable local law.



# Business Integrity

We strive to always act in an honest, direct, and transparent way. Twilio is committed to conducting our business in compliance with all applicable laws, and we expect our Suppliers and business partners to do the same.

Twilio also expects Suppliers to refrain from disrespectful, unprofessional, harassing, defamatory actions and any activities on social media that are prohibited by law or the terms of use on social media platforms. Suppliers will not act or speak on behalf of Twilio, represent themselves as Twilio, or express any views attributable to Twilio unless expressly authorized by Twilio to do so.

## Business Practices and Ethics

Suppliers must not engage in any unlawful activity in conducting business for or on behalf of Twilio, nor should Suppliers instruct others to do so.

## Ethical Conduct

Suppliers must adhere to the highest standard of ethical conduct, respect all local laws, and not engage in any form of illegal or improper business practices such as extortion, fraud or any other act which could enable corruption in any manner. Suppliers shall comply with all legal requirements regarding accurate marketing and sales, and shall act with integrity when handling competitive or proprietary information. Suppliers should not engage in false or misleading accounting practices and should not use fictitious, inaccurate or misleading documents to support transactions related to business with Twilio.

## Fair Dealing

We expect Suppliers to comply with all applicable laws and regulations regarding fair competition and antitrust.

## Anti-Corruption

Twilio is committed to conducting its business in compliance with all laws prohibiting bribery and other corrupt practices. Suppliers must comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, equivalent laws of Supplier’s jurisdiction, and all applicable anti-corruption regulations and international anti-corruption conventions.

## Conflicts of Interest

A “conflict of interest” occurs when personal or professional interests or activities interfere with, or appear to interfere with, the best interests of Twilio or Supplier.



We trust that Suppliers will:

- Avoid conflicts of interests and situations that may have the appearance of a conflict of interest.
- Disclose to Twilio any material transaction or relationship that reasonably could be expected to give rise to an apparent or actual conflict of interest regarding its relationship with Twilio.

### **International Trade and Export Controls**

Twilio expects Suppliers to comply with all applicable import, export, customs, sanctions, embargoes, boycott and other trade compliance laws and regulations.

### **Data protection and privacy**

Twilio is committed to protecting the privacy and security of personal data in our developer ecosystem, and of our employees, contractors, contingent workers, customers and end users. We expect Suppliers to comply with both the contractual protections agreed with Twilio and all applicable data privacy laws and regulations when processing the personal data of Twilio's employees, contractors, contingent workers, customers and end users.

### **Intellectual property and confidential information**

Suppliers may not share, disclose or use Twilio's intellectual property, confidential information, or any other proprietary or non-public information that the Supplier acquires through its engagement with Twilio except as provided for in the applicable contract with Twilio or as provided by express written consent by Twilio.







### Monitoring and Auditing

We expect that every Supplier will:

- Monitor its own operations through appropriate due diligence, audits or other activities.
- Maintain honest and accurate accounting and business records that comply with all relevant legal and regulatory requirements.
- Comply with its agreement with Twilio including any permissions to review records or facilities.
- Establish a process to communicate Supplier Code requirements to its subcontractors, providers and agents and to monitor such parties' compliance with the Supplier Code.

Visit our **Twilio Supplier** page for more information.