RingCentral Vendor Code of Conduct

Updated June 1, 2020
Version 1.2
Prior version

Introduction

RingCentral, Inc. (“RingCentral”) is committed to the highest standards and ethical conduct. This Code applies to RingCentral vendors and their subsidiaries, affiliates, and subcontractors (each a “Vendor”) conducting business with or on behalf of RingCentral. Vendors are expected to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices. RingCentral requires its Vendors to operate in accordance with the principles in this RingCentral Vendor Code of Conduct (“Code”) and in full compliance with all applicable laws and regulations. This Code is not intended to create new or additional rights for any third party. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.
Vendors must promptly inform their RingCentral contact (or a member of RingCentral management) when any situation develops that causes the Vendor to operate in violation of this Code. While Vendors are expected to self-monitor and demonstrate their compliance with this Code, RingCentral may audit Vendors or inspect Vendors’ facilities to confirm compliance. RingCentral may require the immediate removal of any Vendor representative(s) or personnel who behave in a manner that is unlawful or inconsistent with this Code or any RingCentral policy. Compliance with this Code, and attending training on this Code, as may be offered by RingCentral, is required in addition to any other obligations in any agreement a Vendor may have with RingCentral.

Legal and Regulatory Compliance Practices

All Vendors must conduct their business activities in full compliance with the applicable laws and regulations while conducting business with and/or on behalf of RingCentral, and must, without limitation:

- Comply with all applicable trade controls, as well as all applicable export, re-export, and import laws and regulations.

- Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
- Not participate in international boycotts that are not sanctioned by the United States (U.S.) government or applicable laws.
- Not participate in bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. RingCentral is committed to observing the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act ("FCPA") and the anti-corruption and anti- money laundering laws of the countries in which RingCentral operates. Vendors must comply with all applicable anti-corruption and anti-money laundering laws, including the FCPA, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations. Vendors must not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses, and charitable donations) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office to (i) improperly influence any act or decision of the official, employee, or candidate for the purpose of promoting the business interests of RingCentral in any respect, or (ii) otherwise improperly promote the business interests of RingCentral in any respect.

Business Practices and Ethics

Vendors must conduct their business interactions and activities with integrity and must, without limitation:

- Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy.
- Speak to the press on behalf of RingCentral only if the Vendor is expressly authorized in writing to do so by RingCentral.
- Avoid gifts to RingCentral employees because even a well-intentioned gift might constitute a bribe under certain circumstances or create conflicts of interest. Any gifts, meals, or entertainment must comply with applicable law, must not violate the giver's and/or recipient's policies on the matter, and must be consistent with local custom and practice.
- Avoid the appearance of or actual improprieties or conflicts of interests. Vendors must not deal directly with any RingCentral employee whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the Vendor.
- Avoid insider trading by not buying or selling RingCentral or another company's securities when in possession of information about RingCentral or another company that is not

available to the investing public and that could influence an investor’s decision to buy or sell the security

- **Labor Practices and Human Rights**

RingCentral expects its Vendors to share its commitment to human rights and equal opportunity in the workplace. All Vendors must conduct their employment practices in full compliance with all applicable laws and regulations, and must, without limitation:

- Treat workers with the utmost dignity and respect and uphold the highest standards of human rights. RingCentral believes all workers in our supply chain deserve a fair and ethical workplace.
- RingCentral is an equal opportunity employer. RingCentral hires and promotes only the most qualified employees. RingCentral does not discriminate on any legally recognizable basis, including but not limited to race, creed, color, religion, national origin, ancestry, citizenship status, age, disability, sex (including pregnancy, lactation, childbirth, or related medical conditions), marital status, familial status, membership or activity in a local human rights commission, status with regard to public assistance, veteran status, sexual orientation, gender identity, genetic information, or any other characteristic protected by applicable federal, state, or local law. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and coworkers.
- Commit to a workplace free of harassment and abuse. Vendor shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.
- Ensure that all work is voluntary. Vendor shall not traffic persons or use 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.
- Comply with all local and national minimum working age laws or regulations and not use child labor.
- Ensure that workers have an effective mechanism to report grievances and that facilitates open communication between management and workers.
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- **Health and Safety**
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- Vendors are expected to integrate sound health and safety management practices into all aspects of business, and must, without limitation:
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- Provide a safe and healthy work environment and fully comply with all safety and health laws, regulations, and practices including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing.
- Prohibit the use, possession, distribution, or sale of illegal drugs while conducting business with or on behalf of RingCentral.
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- **Environmental Regulations and Protection**.
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- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.
- Adhere to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.
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- **Protection of Assets and Intellectual Property**
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- Vendors are responsible for the proper use of RingCentral assets. This responsibility applies to all RingCentral assets, including work product, billing, physical assets such as inventory, equipment, computers, systems, facilities and supplies, intellectual property, such as patents, copyrights, trademarks, inventions, technology and trade secrets, and other proprietary or nonpublic information.
- Vendor shall respect intellectual property rights and safeguard customer information. Vendor shall manage technology and know-how in a manner that protects intellectual property rights.
- Vendor shall comply with all RingCentral requirements and procedures for maintaining passwords, confidentiality, security and privacy as a condition of providing RingCentral with goods or services or receiving access to the RingCentral internal corporate network, systems, and buildings. All data stored or transmitted on RingCentral-owned or -leased equipment is to be considered private and is the property of RingCentral. RingCentral may monitor all use of the corporate network and all systems (including email) and may access all data stored or transmitted using the RingCentral network.
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- **Reporting Questionable Behavior**
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- If you wish to report questionable behavior or a possible violation of the Code, you are encouraged to work with your primary RingCentral contact in resolving your concern. If that is not possible or appropriate, please contact RingCentral through any of the following methods:
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- Web: may report a complaint on a confidential and anonymous basis by logging into https://secure.ethicspoint.com/domain/media/en/gui/44428/index.html and filing a report.
- Mail: Send a letter to the Director of Compliance at RingCentral, Inc., Legal and Corporate Affairs, 20 Davis Dr., Belmont, CA 94002.
- If your concerns relate to accounting, internal controls or auditing matters, or if the General Counsel or other designated Legal Department contact or another executive officer is implicated in any violation or suspected violation, you may submit a report, either anonymously or not, by logging into https://secure.ethicspoint.com/domain/media/en/gui/44428/index.html.
- Concerns submitted through the above processes that are financial or accounting related will be reviewed by a member of the Audit Committee and General Counsel or their delegates, as appropriate. All other concerns will be reviewed by the General Counsel or a designated representative from the Legal Department.
- RingCentral will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Code.
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- RingCentral is committed to continuously reviewing and updating our policies and procedures. RingCentral therefore reserves the right to amend, alter or terminate this Code at any time and for any reason, subject to applicable law.