

The logo consists of the characters '8x8' in a bold, black, sans-serif font. The background features a large orange shape on the left and a light teal line forming a geometric pattern on the right.

Code of Business Conduct and Ethics

Revised July 28, 2025



Language Translations

Language Translations

French

Indonesian

Portuguese

Romanian

Thai



The background is a solid teal color. In the top-left corner, there is a white geometric shape that looks like a stylized corner or a piece of paper being folded. It consists of several straight lines forming a polygon.

Introduction

At 8x8, we lead with integrity, respect every individual, and commit to doing the right thing, every time, everywhere.

We All Own This Code: This Code applies to all 8x8 employees, officers, directors, contractors, and others acting on our behalf. To keep this Code living and effective, the Legal and Compliance teams update it regularly, track compliance, offer multilingual access, link it to related policies, and require all employees to certify their understanding. Ownership lies with our legal and compliance leaders, and with you.

We Do What's Right: This Code sets the standard for how we work. We follow the law, honor our internal policies, protect privacy, use Company resources responsibly, and compete fairly. We embrace inclusion, guard confidential information, uphold human rights, and act with accountability, whether working in-office or remote, locally or globally.

We're All Accountable: We hold ourselves and our partners to the same high standards. We expect ethical behavior from third parties, responsible use of technology, including AI, and unwavering focus on customer trust and data security. Our decisions reflect a security-first mindset, environmental awareness, and global compliance.

We All Have a Voice: You're empowered to speak up, ask questions, and report concerns without fear. Retaliation has no place here. We back your voice with strong anti-retaliation protections, real-time guidance, and clear reporting channels.

We Live Our Values: 8x8 seeks to strengthen customer trust, simplify global operations, and innovate with purpose. Without our values, metrics alone could lead us off course—we'd be efficient, but not always right. The Code is not just a document; it's the heart of how we work. Our commitment to doing what's right is unwavering, and we live it company-wide. From boardrooms to customer calls, whether remote or in-office, and across every continent, we live our values in every corner of the business.

This Code isn't just a rulebook, it's a shared promise. Let's uphold it, together.

The image features a solid teal background. In the top-left corner, there is a white geometric shape defined by a teal outline. This shape consists of several connected line segments, forming a complex, angular polygon that points towards the top-left. The rest of the page is a uniform teal color.

Our Responsibilities

8x8 is committed to ethical conduct, legal compliance, and accountability. This Code applies to all employees, officers, directors, contractors, agents, and third-party representatives.

Our Responsibilities FAQs

Q: My manager asked me to do something that feels wrong. What should I do?

A: 8x8 relies on you to use your best ethical judgment. Don't do anything that you believe may be wrong. You may express your concerns directly to your manager. If you're uncomfortable addressing with your manager (or you are not satisfied with your manager's response), you can report your concerns to Legal, Compliance, or the Ethics Helpline.

Q: I'm not a legal expert. How can I be sure I'm following the rules?

A: Use good judgment and ask when unsure. If something feels off, pause and check with Legal or HR.

Q: What if doing the right thing hurts the business?

A: Ethics come first. Long-term integrity matters more than short-term results.

◆◆ **Need help?** Contact [Legal](#), [HR](#), or [Compliance](#).

Remember: Ethics come first, always.

Ethics Hotline: (1-833-444-7180)

[Ethics Website](#)

Core Values	<ul style="list-style-type: none"> • Act with honesty and integrity • Comply with laws and policies • Be transparent in disclosures • Avoid conflicts of interest • Speak up without fear of retaliation
Responsibilities	<ul style="list-style-type: none"> • Follow the Code and laws • Use sound judgment • Report misconduct • Cooperate in investigations
Leadership Expectations	<p>Managers must:</p> <ul style="list-style-type: none"> • Lead ethically • Ensure team awareness • Create a safe space for speaking up • Address concerns promptly
Reporting Misconduct	<p>Report to:</p> <ul style="list-style-type: none"> • Your manager • Legal, HR, or Compliance • Ethics Helpline <p><i>Retaliation is prohibited</i></p>
Conduct Standards	<ul style="list-style-type: none"> • Compete fairly • Reject bribery and corruption • Maintain accurate records • Use assets responsibly • Foster a respectful, inclusive workplace • Protect data and privacy
Our Commitments	<ul style="list-style-type: none"> • Promote sustainability and social responsibility • Support human rights and fair labor practices
Legal Accountability	<ul style="list-style-type: none"> • Violations may lead to discipline or legal action • Everyone is responsible for understanding and applying the rules that govern their work

Where to Go for Help: Reporting & Investigations

You are required to report any known or suspected violations of:

- The Code of Business Conduct & Ethics
- Applicable laws or regulations
- Any Company policy or procedure

Here are your reporting options:

- Talk to your manager
- Speak with another manager
- Use the Ethics & Compliance Helpline:

8x8.com/ethicshelpline

Confidential and anonymous reporting is available. Refer to the [Compliance and Reporting Policy](#) for more details.

Email support teams directly:
[Compliance](#) and [Legal](#)
[HR](#)

No Retaliation, Ever

8x8 does not tolerate retaliation, period. If you report a concern in good faith or help with an investigation, you're protected. Reports can be submitted confidentially and are taken seriously. Retaliation should be reported immediately and will lead to disciplinary action.

All employees are expected to cooperate in investigations.

Speak up. You're safe to do so.

8x8 Board of Directors members ("Board") and 8x8 executives may also report any concerns to the Audit Committee Chair.

Violations of the Code

Any employee who violates the law, this Code, or any Company policy, or who knowingly ignores violations, submits false reports, or interferes with an investigation, may face disciplinary action, up to and including termination. In serious cases, violations may lead to civil or criminal prosecution.

8x8 will cooperate with law enforcement or regulatory authorities when required or appropriate and will self-report compliance breaches as legally mandated.

All employees are expected to fully and truthfully cooperate in any investigation related to potential misconduct.

The image features a solid teal background. In the top-left corner, there is a white geometric shape defined by a dark teal outline. This shape consists of several connected line segments, forming a complex, angular polygon. The word "Policies" is centered in the teal area.

Policies

Conflicts of Interest

The Company requires you to avoid any conflict, or even the appearance of a conflict, between your personal interests and the Company's interests. Avoid situations where your personal interests interfere with those of the company. Always disclose any outside employment, personal investments, or relationships that could create a conflict. All 8x8 employees, officers, and directors must act in the Company's best interests and avoid situations where personal interests interfere with job duties.

Conflicts of Interest - Examples

- Owning a significant stake in a competitor, supplier, or customer
- Holding a second job that affects your 8x8 performance
- Hiring or supervising a relative or close friend
- Accepting gifts, favors, or entertainment that could influence your decisions
- Taking advantage of business opportunities for personal gain

You must not offer or accept gifts or favors that create real or perceived obligations. Small, nominal gifts may be acceptable. See 8x8's [Anti-Corruption and Anti-Bribery Policy](#) and [Gift, Hospitality, Travel and Expense Policy](#).

Family members may apply for roles if they don't report to you, but you must not influence the process. Disclose any potential conflicts to your manager or Legal for guidance. Board members should consult the Audit Committee.

Conflicts of Interest FAQs

Q: Can I hire a family member as a contractor?

A: No, especially if you'd supervise the work or influence the decision.

Q: Can my daughter apply to 8x8?

A: Yes—if she wouldn't report to you, you're not involved in hiring and you wouldn't influence the decision.

Q: Can I invest in a startup that may work with 8x8?

A: Possibly—get written approval from Legal first.

Corporate Opportunities

Employees may not use Company resources, information, or their position for personal benefit. You must not pursue business opportunities that belong to 8x8 or compete with the Company in any way.

If you learn of a potential opportunity through your role at 8x8, you are expected to put the Company's interests first and bring it to the appropriate internal team.

Confidentiality

Protect 8x8's confidential data. Share only if authorized and required, and follow our security policies. You must protect all non-public information related to 8x8, its customers, suppliers, and partners.

Never use or disclose confidential

information for personal benefit or outside business purposes—unless authorized by an executive officer or required by law, as confirmed by Legal.

Confidential information includes:

- Financials, pricing, and vendor terms
- Customer and account data
- Product roadmaps, source code, and internal tools
- HR, compensation, or performance data
- Strategic or operational plans

Your obligation to protect this information continues even after you leave 8x8. Always use NDAs when sharing outside the company and be mindful of your surroundings when discussing sensitive topics.

Confidentiality Q&A

Q: Can I talk about my work at 8x8 after I leave?

A: Confidentiality rules still bind you and cannot share non-public or sensitive information.

Q: How do I know if something is confidential?

A: If it's not public, assume it's confidential—even if it isn't labeled as such.

Q: A coworker accessed a customer's account out of curiosity and shared it with us. Is that okay?

A: No. Accessing or sharing customer data without a business need violates policy and may be illegal.

Refer to your confidentiality agreement and [Insider Trading Policy](#), or contact [Legal](#) for guidance.

Fair Dealing, Anti-Corruption & Competitive Information

Treat customers, partners, and competitors honestly and fairly. Never engage in bribery, corruption, or anticompetitive behavior. Follow antitrust and anti-bribery laws in all markets where we operate.

8x8 competes with integrity. We never use deception, confidential competitor data, or unfair tactics to gain an edge. Respect proprietary information—whether it's ours or someone else's.

- Follow all antitrust and competition laws. Never agree with competitors to fix prices, divide markets, or restrict customers. All sales and marketing claims must be truthful and verifiable.
- If you're unsure about legal limits, [ask Legal](#).

Fair Dealing FAQs

Q: Can a new hire share info from her former employer?

A: No. We don't use or accept confidential information from prior companies.

Q: A competitor is spreading false claims. What can I do?

A: Stick to accurate comparisons and contact Legal for next steps.

Q: Can I use a fake name to attend a competitor's event?

A: No. Misrepresenting yourself to gather information is prohibited.



Protection and Proper Use of Company Assets

All 8x8 employees must protect Company assets (physical, digital, and intellectual) and use them only for legitimate business purposes. Compliance with information security and acceptable use policies is required.

Theft, carelessness, and waste harm 8x8's business. Authorized employees must approve payments with proper documentation, per the Corporate Signature and Approval Policy. Circumventing approval processes is a Code violation.

Report any suspected fraud, theft, or misuse immediately. Company-provided tools (email, devices, software, internet, etc.) must be used professionally. Occasional personal use is allowed if it doesn't disrupt work. 8x8 may monitor usage without notice.

Prohibited uses include:

- Hacking or piracy
- Soliciting or distributing non-business content
- Inappropriate communications or websites
- Sharing confidential or proprietary information externally

Protect all 8x8 intellectual property. Only authorized employees may speak on 8x8's behalf, including on social media. Refer to your country-specific Employee Handbook, Social Media Policy, and Acceptable Use Policies for full guidelines.



Compliance with Laws, Rules, and Regulations

8x8 employees must follow the laws of all jurisdictions where we operate. If a Code provision conflicts with local law, the law prevails.

Violating laws or this Code, or encouraging others to do so, can harm 8x8 and may lead to disciplinary action, including termination. Legal violations may also result in civil or criminal penalties for both the Company and the individual.

Contact the Chief Legal Officer with any questions about applicable laws or compliance.

Insider Trading and Confidential Information

Don't trade stocks or share tips based on material, nonpublic information about 8x8 or others. It's illegal and against our Code.

If you have access to confidential information, you must use it only to conduct 8x8 business, not for trading stock or sharing with others. You may not trade 8x8 stock, or the stock of a customer, supplier, competitor, or partner while holding material, nonpublic ("inside") information. You also may not tip others to trade based on that information.

- Material information includes anything a reasonable investor would consider important in deciding to buy, sell, or hold securities. Nonpublic information means it hasn't been publicly disclosed.
- All 8x8 personnel must follow the Insider Trading Compliance Program and other confidentiality policies. Insider trading is illegal and may result in civil or criminal penalties for both the individual and the company.
- If you're unsure about what qualifies as inside information or how to handle it, contact the Chief Financial Officer or Chief Legal Officer.

Insider Trading FAQs

Q: My family asks if they should buy 8x8 stock. Can I tell them what I know?

A: Be careful. If you share material nonpublic information, even unintentionally, and they trade on it, you could both face legal consequences. Avoid giving tips or making recommendations based on inside information.

Q: I overheard that Vendor XYZ may acquire another company. Can I trade on that?

A: No. It doesn't matter how you got the information. If it's material and nonpublic, you cannot trade on it.

Inclusion, Respect, and Equal Opportunity

At 8x8, we value a culture of inclusion, fairness, and respect. We expect everyone to treat colleagues professionally, welcome diverse perspectives, and help create a workplace where all can thrive.

We make employment decisions based on role requirements and qualifications, never on prohibited personal characteristics. We comply with all employment laws and provide reasonable accommodations as needed.

Zero Tolerance for Discrimination and Harassment

We do not tolerate discrimination or harassment of any kind. This includes slurs, threats, offensive jokes, unwelcome sexual conduct, or forcing uncomfortable interactions (e.g., late-night video calls or screen sharing without consent). Report any inappropriate behavior to your manager, [HR](#), or the [Ethics and Compliance Helpline](#). Retaliation is not tolerated.

Day-to-Day Inclusion

- Treat others as they want to be treated
- Speak and listen with professionalism and empathy
- Raise concerns when you see misconduct

Community Involvement

We encourage volunteering and charitable giving. Get approval before using Company resources or acting on 8x8's behalf. Use our official programs when giving back.

Have questions? Contact [Legal](#) or the [Ethics and Compliance Helpline](#).

Health, Safety & Substance-Free Workplace

We're committed to maintaining a safe, healthy, and respectful work environment. You play an active role by following safety protocols and promptly reporting accidents, injuries, unsafe conditions, or equipment issues.

8x8 strictly prohibits weapons, firearms, explosives, and incendiary devices on Company property, including parking areas and vehicles, to protect everyone's security. We do not tolerate violence, threats, or behavior that risks harm. Report any such concerns immediately to your manager, [Security](#), [HR](#), or the [Ethics and Compliance Helpline](#).

Report to work fit for duty, free from illegal drugs, marijuana, alcohol, or other impairing substances. The use, sale, or possession of illegal drugs is strictly prohibited. At Company events, consume alcohol responsibly and arrange safe transportation if needed. Do not use any substance in a way that impairs performance.

Prohibited conduct includes:

- Falsifying reports (e.g., expenses, timesheets, sales)
- Providing false quality or safety data
- Misrepresenting financials or hiding liabilities
- Manipulating transactions or benefit program details

For more information, refer to your country-specific 8x8 Employee Handbook and 8x8's [Smoking, Alcohol, and Drugs Policy](#).

Accurate Record-Keeping & Reporting

Always record and report financial information truthfully. Falsifying records or hiding funds breaks our Code and the law. Document all business information truthfully—expenses, timecards, emails, financial data, and more. Never falsify or hide entries. If unsure about an expense, ask the Finance Department and [Legal](#). Executives and Board members should consult the Audit Committee.

Maintain records per 8x8's Data Retention & Backup Policy. Don't delete documents tied to audits, legal matters, or investigations. Report any pressure to alter, conceal, or destroy records, or any false statements made to auditors or regulators.

Use clear, professional language in all business communications, no exaggerations, guesses, or inappropriate remarks.

Record-Keeping FAQs

Q: What if I report fraud and I'm wrong?

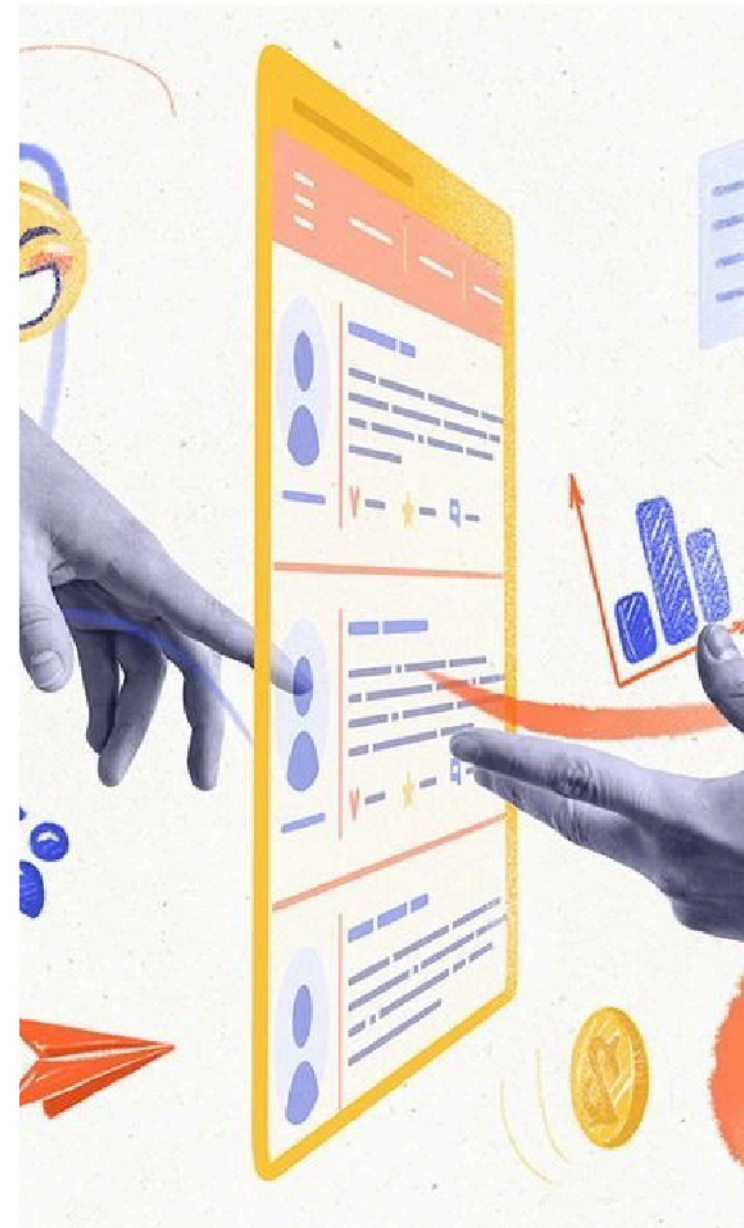
A: You won't face discipline for good-faith reports. Investigations are conducted objectively, fairly, and as confidentially as practicable.

Q: I deleted emails that may be relevant to a lawsuit. What should I do?

A: Tell your manager, Legal, and IT right away. They may be able to recover the data.

Q: My manager asked me to delete project emails. Is that okay?

A: Only if allowed under our [Data Retention and Backup Policy](#) and there's no known or pending investigation or legal matter.



Anti-Corruption & Anti-Bribery

8x8 follows strict anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. These laws and 8x8 policy ban all forms of bribery, kickbacks, and improper payments. This applies to employees, officers, contractors, and anyone acting on 8x8's behalf.

You must never offer, promise, give, or accept anything of value to try to:

- get business
- keep business
- gain an unfair advantage
- influence a decision

A bribe is receiving, offering to pay, paying, promising to pay, or authorizing the payment of money or **anything of value** to improperly influence any act or decision or to secure any other improper business advantage.

Bribes are not limited to cash. A bribe can be gifts, travel, meals, entertainment, employment offers, and charitable or political contributions.

Bribery Red Flags:

- Excessive commission payments
- Vague consulting agreements without deliverables
- Offers or requests for lavish entertainment or luxury gifts

If winning business requires a bribe, report it to Legal and walk away. Never offer or accept bribes, facilitation payments, or illegal incentives.

Anything of value includes:

cash or cash equivalents (like gift cards)
gifts or favors
meals or entertainment
travel and lodging
charitable donations
business opportunities
job offers or internships
personal services

Do not give or accept anything:

- That could harm 8x8's reputation
- That's extravagant or violates laws

Always get manager or Legal approval for anything questionable or involving public officials.

Gifts & Entertainment

Purpose:

The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships, ***not to gain unfair advantage with customers.***

Do not give or accept anything:

- That could harm 8x8's reputation
- That's extravagant or violates laws

Always get manager or Legal approval for anything questionable or involving public officials.

Accepting Gifts:

You and your immediate family members cannot accept material gifts or favors—including, but not limited to, a loan or guarantee of a loan—that could create the appearance that your business judgment could be affected by the receipt of such gifts or favors.

You and members of your immediate family, however, can accept gifts of nominal value from existing sources, prospective sources or persons, firms or companies with whom the Company does or might do business.

Offering Gifts

You cannot offer gifts or favors to any employee, or a member of the employee's immediate family, of a competitor, supplier or customer if the gifts or favors might place the recipient under any obligation to you or to the Company.

Refer to: [Anti-Corruption and Anti-Bribery Policy](#), and the [Gift, Hospitality, Travel and Expense Policy](#).

Gifts & Entertainment FAQs

Hiring a Family Member

Q: My daughter is seeking employment and has expressed an interest in working for 8x8. What is our company policy on this?

A: If the hiring policy at the relevant 8x8 location allows it, your daughter can apply for employment with our company, as long as the position for which she applies does not report to you (and you would not be reporting to her). Her application will be evaluated according to the same criteria as all other applications. You cannot use your influence or position to affect the hiring process.

Personal Investment in a Potential Vendor

Q: A friend asked me to invest in a company that will produce a product that might eventually be sold to 8x8. If my only involvement in the new company is financial, is it a conflict of interest?

A: This has the potential to be a conflict, depending on your position with our company, the ability you have to influence 8x8's purchasing decisions, the amount of your investment and the importance of our company as a future customer to the new company. Before investing, you should advise the [Legal Department](#) and your manager and obtain prior written approval.

Family Member Hired in the Same Department

Q: My co-worker's son has just been hired for a job in our department. Does this represent a conflict of interest?

A: We do have cases where relatives work in the same department. When this occurs, we ensure that raises and job performance evaluations are handled by someone independent, and the situations are monitored on an ongoing basis to ensure objectivity and fairness.

Political Contributions

No Company Contributions

8x8 does not permit any direct or indirect contributions to political campaigns or parties on behalf of the Company.

No Reimbursement for Personal Contributions

Company personnel may not use expense accounts or seek any reimbursement from 8x8 for personal political contributions.

Personal Political Activity Permitted

Employees are free to participate in political activities on their own time and using their own personal resources.

Do Not Speak on Behalf of 8x8 Without Authorization

Employees must not represent themselves as someone authorized to speak on behalf of 8x8 in any public or political forum unless explicitly authorized by the Company.

Political Contributions FAQs

Q: Can I attend a political fundraiser on behalf of 8x8?

A: No. 8x8 does not permit any direct or indirect contributions to political campaigns or parties on behalf of the Company. Representing 8x8 at a fundraiser could be viewed as a Company-sponsored political contribution. You may attend on your own time using your own personal resources.

Q: A colleague suggested we pool funds and make a group donation under the Company's name. Is that allowed?

A: No. The Company cannot contribute, directly or indirectly, to any political campaign or party. This includes coordinated donations that appear to represent 8x8. You may contribute personally, but not in a way that implies Company endorsement or sponsorship.

Q: Can I list 8x8 as my employer when supporting a candidate or cause?

A: You may list 8x8 as your employer only when required for disclosure purposes (e.g., on a government donation form). You may not imply that your political activity is endorsed by or associated with 8x8.

Anti-Corruption and Anti-Bribery Policy FAQs

Q: A vendor wants extra payment to verify tax documents with local officials. What should I do?

A: Report it to [Legal](#) or the [8x8 Ethics and Compliance Helpline](#). We must investigate and stop any improper payments.

Q: Can a foreign company pay for my travel to visit their site?

A: Yes, if business-related, reasonable, and pre-approved. No side trips.

Q: A vendor offered me sports tickets. Can I go?

A: Possibly. You may accept if it's modest, not recurring, and doesn't influence decisions, but get your manager's written approval.

Q: A client gave me an expensive crystal bowl. Can I keep it?

A: Likely not. If returning it is awkward, talk to your manager about donating it or using it for the company.

Q: A partner can speed up a license if we pay extra. Is that OK?

A: No. It's likely illegal, even if the partner makes the payment.

Q: We're asking vendors to donate to a local charity. Is that allowed?

A: No. Vendors must never feel pressured to give gifts or favors.

Anti-Money Laundering

Prohibited Conduct

8x8 prohibits all employees, officers, and third parties acting on its behalf from engaging in or facilitating money laundering or any transaction that supports criminal activity.

Money laundering involves disguising the origin of illicit funds—often through complex or opaque transactions—and may support crimes such as terrorism financing, drug trafficking, bribery, and fraud. These activities are illegal under U.S., international, and local laws.

Business Partner Integrity and Diligence

You must only conduct business with reputable entities engaged in lawful activity. Apply appropriate diligence when evaluating customer identities, beneficial ownership, business purpose, and payment methods. Follow all Know Your Customer (KYC) and Customer Due Diligence (CDD) procedures during onboarding and throughout the relationship.

Recordkeeping and Retention

You must retain AML-related documentation, including due diligence and transactional records, for the period required under applicable laws or [8x8's Data Retention and Backup Policy](#), whichever is longer.

Prohibited Transactions

Do not:

- Accept cash, travelers checks, or payments from unverified third parties
- Approve or process complex, opaque, or unusually structured transactions
- Facilitate transfers routed through unrelated or high-risk jurisdictions
- Proceed with transactions that do not align with the customer's expected business profile

Suspicious Activity and Escalation

Immediately report any suspicious activity—such as invoicing third parties in unrelated countries or accepting cash payments—to [Compliance](#) and [Legal](#). Stop all related transactions until the appropriate teams complete their review and issue written clearance. "Suspicious" includes any transaction that appears inconsistent, irregular, or intentionally evasive, even without confirmed wrongdoing.

Common Red Flags

- Requests for cash, travelers checks, or payment from unknown third parties
- Complex payment patterns or unexplained urgency
- Transfers involving countries with known laundering or diversion risks
- Evasive responses about the origin of funds or business purpose
- Transactions that bypass standard documentation or recordkeeping
- Requests designed to obscure the customer's identity or ownership

Anti-Money Laundering FAQs

Q: A customer asks us to invoice a third party located in a different country—one known for product diversion—and wants to pay in cash. What should I do?

A: Do not proceed with the transaction. This request raises multiple red flags for potential money laundering or unlawful diversion of goods, including:

- Invoicing a third party unrelated to the original customer
- Routing payment through a high-risk or unrelated jurisdiction
- Requesting to pay in cash, which may conceal the source of funds

These tactics may indicate an attempt to bypass legal or regulatory controls.

You must:

- Immediately report the situation to [Legal](#)
- Pause all related business activity until those teams complete a formal review and provide written clearance
- Never assume the request is legitimate, even if the customer appears reputable or longstanding
- Always escalate if the transaction appears suspicious, inconsistent, or overly complex—even without definitive proof of wrongdoing

If you prefer to report confidentially or anonymously, contact the 8x8 Ethics & Compliance Hotline/[Website](#): (1-833-444-7180).

Data Protection and Security

8x8 protects personal data and complies with global privacy laws. All employees and vendors must follow our 8 Privacy Principles when handling personal information.

- Personal data includes anything that can identify someone—like a name, ID, IP address, or employee number.
- Keep data secure, use it only as needed, and report any breaches right away to [Information Security](#) or DPO@8x8.com. Mishandling data can lead to discipline, legal penalties, or loss of trust.

Personal information is any information that relates to an identified or identifiable person.

Examples:

- Unique identifiers such as an individual's name, ID number, location, online identifier or IP address
- Particular characteristic about that individual (such as a physical, physiological, genetic, mental, economic, cultural or social characteristic)

Data Protection and Security FAQs

Q: How do I know if information is personal?

A: If it can directly or indirectly identify someone, it's personal. Even without names, things like employee numbers or IPs can qualify. For example, a spreadsheet containing salaries and employee numbers is personal data even if it doesn't include names because it may be possible to identify an individual employee from the information.

Q: Do stricter rules apply to some personal data?

A: Yes. Sensitive data like health or financial info requires stronger protections under laws and 8x8 policies.

Q: What if I send an email to the wrong person?

A: Report it to [Information Security](#) immediately, especially if it includes personal data. We may need to notify regulators quickly.

8 Privacy Principles

All personnel must comply with 8x8's Privacy Principles. Refer to Internal Data Handling Procedure and information security policies.

8x8 personnel who fail to follow these requirements risk compromising personal information and may face disciplinary action, including termination of employment.

Misusing personal information can harm or distress individuals, breach 8x8's legal obligations under data protection laws, and expose the Company to serious consequences including regulatory fines, legal claims, reputational damage, and loss of trust. In some cases, such misuse may also amount to a criminal offense.

1. We collect and use personal information only as allowed by applicable data protection laws.

2. We explain what personal data we collect, why we collect it, and how we use it through clear and accurate privacy notices.

3. We always have a lawful reason for using personal information and only use it for the purpose stated when it was collected. Consent is obtained where required.

4. We only collect the personal information we need, and we keep it only as long as necessary.

5. We make reasonable efforts to ensure the data we keep is accurate and up to date.

6. We take appropriate technical and organizational measures to protect personal data from unauthorized access, loss, or misuse. Only authorized individuals with a valid business need may access personal information.

7. We respect individuals' rights to access, correct, delete, or object to how their data is used, including their rights related to direct marketing. We respond promptly to all data subject requests.

8. When we transfer personal data across borders, we ensure that we meet applicable legal requirements, including by using approved contractual safeguards.

Personal Data Defined

Personal Data refers to any information that relates to an identified or identifiable individual. This includes direct identifiers (such as a name, phone number, or email address), as well as indirect identifiers (such as an IP address, device ID, or geolocation data), which may identify a person when combined with other information. It also includes sensitive Personal Data, such as health information, financial records, race or ethnicity, biometric data, political opinions, or sexual orientation, which may require heightened protections.

At 8x8, Personal Data may appear in many forms, including customer account details, call recordings, support transcripts, analytics logs, marketing lists, and employee records.

Your Responsibilities

All 8x8 employees, contractors, and vendors must:

- Handle Personal Data responsibly and lawfully, in accordance with company policies and global privacy regulations (e.g., GDPR, CCPA).
- Use personal data only for authorized business purposes.
- Secure Personal Data against unauthorized access, sharing, or loss using approved tools and safeguards.
- Report any suspected misuse, unauthorized access, or data breach immediately to DPO@8x8.com or through the [Ethics & Compliance Helpline](#).

Examples by Role

Function

Examples of Personal Data You May Handle

Sales/Marketing
Engineering
Support
HR

Customer names, email addresses, campaign interactions
IP logs, user analytics, system metadata
Call recordings, account notes, configuration data
Employee health disclosures, identification documents, payroll

Why It Matters

Mishandling Personal Data can lead to:

- Regulatory fines and investigations
- Loss of customer trust and business
- Reputational damage to 8x8
- Disciplinary action, including termination

This Code of Conduct works alongside **8x8's Global Information Security Policy, Internal Data Handling Standards, and IT Security Policy**. For more detail on acceptable practices, refer to those documents or contact the Privacy team.

Disclosure

All public communications must be full, fair, accurate, and clear. We must disclose material non-public information promptly, in line with applicable laws and stock exchange rules.

Employees must follow the Company's disclosure procedures and financial reporting controls.

Questions? Contact [Legal](#).

Environmental Stewardship

8x8 operates responsibly to reduce environmental impact. We use energy efficiently, follow all applicable laws, and expect employees to do the same. We also prioritize working with environmentally committed suppliers.

Human Rights and Fair Labor

8x8 respects human rights and expects fair, safe, and lawful treatment of all workers. We reject forced labor, human trafficking, and unsafe conditions. Suppliers must follow our [Supplier Code of Conduct](#). Hourly employees must accurately report time worked.

Waivers and Enforcement

Only the Board may approve and disclose waivers for directors or executive officers, as required by law. 8x8 may grant a waiver only if clearly in the Company's and shareholders' best interest. Violations of this Code may lead to disciplinary action, including termination or legal liability. All employees must read, certify, and follow this Code and related policies.

Amendments

This Code may only be amended by the Board. The Company must report promptly any amendments pertaining to executive officers or senior financial officers as required by applicable Laws.

Legal Notice

8x8 does not create an employment contract through this Code. We may update it as needed and will follow local law where conflicts arise.

Remember:

We're one 8x8—innovation is our brain, execution is our feet, and ethics is our heart.

- At 8x8, ethics aren't just policies—they're the pulse of our global culture, breathing life into how we work, lead, and grow.
- This Code is our commitment to integrity, respect, and doing what's right—even when it's hard, especially when it matters most.
- Doing the right thing should never come at the cost of growth, speed, or innovation.

Instead, when values and velocity move in sync, Team8s thrive—and that shared rhythm of ethics keeps us moving forward, together.

8x8

Thank you for reading
Code of Conduct