

WORKDAY CODE OF CONDUCT

Living Our Values Every Day



Table of Contents

A message from our CEO.	3	Integrity.	11
Our shared commitment.	4	Providing appropriate gifts and business entertainment.	11
Our core values.	4	Avoiding conflicts of interest.	12
Our shared responsibility.	4	Preventing improper payments.	13
Leading with integrity.	4	Developing and using AI responsibly.	14
We speak up.	5	Advertising truthfully.	15
Workplace.	6	Competing fairly.	15
Building an inclusive workplace.	6	Accurate records.	15
Workday is an equal opportunity employer.	6	Laws and regulations.	16
Preventing discrimination and harassment.	7	Trade laws.	16
Drug-free workplace.	7	Insider trading.	16
Health and safety.	7	Government relationships.	17
Trust.	8	Public disclosures.	18
Keeping information secure.	8	Our commitment to human rights.	18
Workday confidential and proprietary information.	8	Corporate social responsibility.	19
Data privacy.	9	Political contributions.	19
Protecting Workday intellectual property.	10	Charitable contributions.	19
Respecting the intellectual property of others.	10	Environmental sustainability.	19
Workday assets and resources.	10	Global impact.	19
		Administration, waiver, and amendment.	20



A message from our CEO.

January 2025.

At Workday, Integrity is the foundation for everything we do. In fact, it’s one of our company’s core values. We say what we mean and mean what we say. We are committed to doing the right thing, acting with integrity, and treating others with respect.

The Code of Conduct helps us understand how to operate our business ethically with integrity so we can focus on our other core values: providing a great work environment for employees, providing outstanding service to customers, delivering innovative products and services, having fun at work, and achieving long-term profitability. The Code is our public affirmation that we, as members of the Workday community, are committed to conducting business ethically and with integrity.

Our commitment to integrity extends to how we treat each other and our customers, partners, suppliers, communities, and shareholders. We expect everyone at Workday to read and commit to following the Code. Refer to the Code when you have questions and if something is unclear, speak up. Your manager, the People & Purpose team, and the Workday Integrity team are here to help. Our independent and confidential [Speak Up](#) reporting tool is also available for asking questions or reporting concerns.

Together, let’s continue to make Workday a place where we are proud and excited to work.

A handwritten signature in black ink that reads "Carl Eschenbach". The signature is fluid and cursive, written in a professional style.

Carl Eschenbach

Our shared commitment.

At Workday, our Code of Conduct isn't just a set of rules; it's a reflection of our unwavering commitment to integrity and ethical behavior. This Code of Conduct (the "Code") lays out the legal and ethical expectations for every Workmate, from employees to board members (collectively "Workmates"). We believe in doing the right thing, always, and conducting our business with the highest standards of integrity and in compliance with all applicable laws. While this Code might not cover every possible scenario, it provides clear principles to guide your decisions and actions as you represent Workday. We trust that every Workmate will familiarize themselves with and uphold this Code. Failing to comply with the Code could put you, your colleagues, and Workday at risk and may result in disciplinary action, up to and including termination.

Our core values.

Our core values serve as the foundation for these expectations, shaping our decisions, actions, and interactions. By upholding these standards, we protect our company, our colleagues, and ourselves. Upholding these principles isn't just about avoiding risk—it's about doing what's right, even when it's challenging.



Employees



Customer Service



Innovation



Integrity



Fun



Profitability

Our shared responsibility.

Every Workmate has the power to make a difference. By acting with integrity and adhering to this Code, all Workday policies, and the Employee Handbook, we collectively build a culture of trust and excellence. These resources provide detailed guidance on how to navigate complex situations and make choices that reflect our values. If you encounter uncertainty or ethical dilemmas, remember that seeking guidance and reporting concerns is not only encouraged but also essential to maintaining our high standards.



Leading with integrity.

Our people leaders are instrumental in creating an environment where ethical conduct flourishes. As a leader, you have a unique opportunity to inspire others through:

- Leading by example: Your actions set the tone for your team.
- Fostering openness: Cultivate a safe space for Workmates to share their perspectives and concerns without fear.
- Taking action: Address ethical concerns proactively and decisively.
- Seeking guidance: Utilize available resources when facing complex decisions that challenge our values.

Ethical decision-making framework.

Although the Code does not explicitly address every issue or situation you may encounter at Workday, it contains the guidelines, rules, and principles that must be followed when you are acting on behalf of Workday. While this Code offers comprehensive guidance, unforeseen situations may arise. When facing a difficult decision, rely on this framework:

- Is the action legal, ethical, and socially responsible?
- Does it align with the spirit of this Code and Workday values?
- Would Workday be proud to share this action publicly?
- Could I benefit from another person's perspective?

By following this Code, utilizing this framework, and trusting each other, we ensure that integrity remains at the heart of everything we do at Workday. We are all responsible for upholding this Code and together, we build a workplace that reflects our values and inspires us to achieve great things.

We speak up.

At Workday, your voice matters. We encourage you to speak up and share your concerns. Your feedback helps shape our company’s values. We offer a range of resources to assist you in understanding our Code of Conduct and reporting any policy violations or concerns. Your managers and senior leadership are readily available to address questions about Workday guidelines specific to your work.



Integrity Team

The Workday Integrity Team can provide deeper insights into the Code, ethical conduct, and company policies; you can reach them at integrity@workday.com.



People & Purpose (P&P)

For any concerns related to employment, benefits, or the workplace, People & Purpose (P&P) is there to help at ask.peoplepurpose@workday.com.

If you have general questions on P&P programs, you can submit your question or request to P&P on [Service Hub](#).



Speak Up Tool

If you prefer a confidential channel, our Speak Up tool is accessible 24/7 online at speakup.workday.com or by phone at 800–325–9976. While you may have the option to remain anonymous, we encourage you to share your identity and provide as much detail as possible to enable a thorough investigation.



Employee Relations

You can also reach out directly to employee.relations@workday.com to report any concern.



Audit Committee

For matters you wish to bring directly to the Audit Committee of the Workday Board of Directors, you can either use the Speak Up tool and specify that it’s for the Audit Committee, or reach out to the General Counsel at Generalcounsel@workday.com or by mail to:
Workday Board of Directors, Audit Committee Corporate Secretary
6110 Stoneridge Mall Road, Pleasanton, CA 94588

Workday strictly prohibits any form of retaliation against individuals who report concerns in good faith. We treat all reports with utmost seriousness and investigate them promptly and confidentially. Your cooperation during any investigation is crucial.

For further information, please refer to the Workday [Whistleblower and Complaint Policy](#). Remember, your voice is vital in maintaining our company’s integrity. Workday will promptly investigate any allegations of wrongdoing. All reports will be addressed with confidentiality, to the extent possible. All Workmates are required to participate in and cooperate fully with an investigation (when asked), including providing truthful and complete responses and maintaining the confidentiality of the investigation. Failure to participate or cooperate in an investigation is a violation of the Code of Conduct and can result in disciplinary action up to and including termination of employment.



Workplace.

Building an inclusive workplace.

At Workday, we believe that a diverse, inclusive, and equitable workplace where everyone feels valued and included is the key to an enduring company with happy Workmates and customers and great products. Part of what makes our culture unique is our unwavering commitment to Value Inclusion, Belonging, and Equity (VIBE™) for all. We all play a role in VIBE and in creating a workplace where Workmates are respected as equals—and this includes engaging professionally and respectfully with Workmates who have different backgrounds, experiences, perspectives, insights, and skills. Valuing inclusion and creating equal opportunities in the workplace promotes belonging and helps make Workday a great place to work.

While we know sharing perspectives and having a dialogue is an important part of connecting with one another, not all discussions and behaviors are appropriate for the workplace. Workday expects professional and respectful behavior at all times, and every Workmate has an important role to play to help ensure we’re maintaining a respectful workplace culture that is free of harassment, bullying, bias, and unlawful discrimination of any kind.

Learning link:

Respectful Workplace Policy





Workday is an equal opportunity employer.

Workday does not unlawfully discriminate in any employment decisions, including hiring, compensation, promotion, discipline, or termination. This includes discrimination on the basis of “protected characteristics.” Workday is also committed to providing reasonable accommodations to qualified individuals with disabilities and individuals with sincerely held religious beliefs and practices.

Protected characteristics include:

- Age
- Ancestry
- Color
- Gender (including pregnancy, childbirth, or related medical conditions)
- Gender identity or expression
- Genetic information
- Marital status
- Medical condition
- Mental or physical disability
- National origin
- Protected family care or medical leave status
- Race
- Religion (including beliefs and practices or the absence thereof)
- Sexual orientation
- Military or veteran status
- Other considerations protected by law

Preventing discrimination and harassment.

Workday strives to create a professional environment where respect, tolerance, and inclusion are paramount. Discrimination or harassment of any kind will not be tolerated. This zero-tolerance policy applies to everyone within our community including Workmates, vendors, suppliers, contractors, consultants, and customers. It also applies at all Workday offices or events including team/department summits or off-sites; customer events; Workday-sponsored events; when visiting customers, partners, and prospects; and any other occasion when representing Workday.

Speak up if you experience or witness any violation of this policy. Your voice matters, and we are committed to taking all complaints and reports seriously. No one will face adverse employment action for making a good-faith complaint or report, assisting in an investigation, or exercising their rights under applicable laws. Retaliation against anyone engaging in such protected activity is strictly prohibited and will not be tolerated.


To understand how we address employee concerns, visit our [Employee Relations Investigations Process page](#).

Learning link:

Whistleblower and Complaint Policy

Harassment, Discrimination, and Bullying Policy

See your applicable Employee Handbook or comparable employment policies.



Drug-free workplace.

Workday strives to maintain a professional, drug-free work environment. Use of alcohol, illegal drugs, or unauthorized controlled substances, whether on or off the job, can detract from work performance, efficiency, safety, and health and seriously impair a Workmate’s contributions to Workday. Specifically, Workday policy prohibits:

- Possession or use of an illegal drug or unauthorized controlled substance or being under the influence of an illegal drug or unauthorized controlled substance while on the job
- Driving a vehicle while on Workday business while under the influence of alcohol, an illegal drug, or an unauthorized controlled substance
- Distribution, sale, or purchase of an illegal drug or unauthorized controlled substance while on the job

Workday permits moderate consumption of alcohol by legal-age individuals at Workday-sponsored events. It’s essential that all participants exercise good judgment, maintain professional and responsible behavior, and adhere to any guidelines provided for the specific event. Attendance at Workday social events is entirely voluntary, and there should be no pressure on Workmates to consume alcoholic beverages if they choose to attend.

Health and safety.

Workday prioritizes the health and safety of all Workmates and individuals within our work environment. We foster a culture of safety consciousness, where everyone is encouraged to proactively identify and report any work-related injuries, illnesses, or hazardous conditions.

Workday maintains a zero-tolerance policy toward violence in the workplace. The possession of weapons is strictly prohibited at any Workday facility, event, or customer site. We are dedicated to ensuring a secure and respectful environment for all.



Inspiring integrity:

Immediately report any work-related injuries or illnesses and/or any safety concerns or threats to Global Workplace Safety at +1-925-701-4444 or +353 (1) 707-6644 and safety@workday.com.

Trust.

At Workday, trust is foundational to everything we do. We deploy industry-leading safeguards and continuously monitor our systems. We are transparent about what we do and how we do it.



Keeping information secure.

Security is everyone’s responsibility at Workday, regardless of your role. We are committed to protecting our sensitive data, systems, and infrastructure from cybersecurity threats. We take great care to safeguard our information assets; protect the confidentiality, integrity, and availability of information; and ensure compliance with relevant laws, regulations, and customer commitments.

Every Workmate is responsible for promptly reporting security incidents and for assisting with investigations as required.

Learning link:

- Security Documentation Confluence Page
- Security Portal on Okta



Workday confidential and proprietary information.

Workday employees regularly have access to confidential or proprietary information related to Workday and our customers, suppliers, and partners. Protecting this information is crucial to Workday and our stakeholders.

Examples of confidential or proprietary information include, but are not limited to:

- Workday information: product roadmaps, unreleased features, financial data, internal communications, and employee information
- Partner information: details of joint projects, customer lists, pricing models, and any other sensitive data shared between Workday and our partners
- Customer information: any personal or business data entrusted to Workday by our customers

Please share confidential information only with Workday employees who have a business need to know. Avoid discussing such information with anyone outside of Workday, including family and friends. Take precautions to avoid inadvertent disclosure of confidential information, and be mindful of what you publicly share about Workday.

If an outside consultant or analyst offers to pay you for your perspective on the market and specific products, you should decline. Not only would you potentially be putting the confidential information of Workday and our customers, suppliers, and partners at risk, but you would also be in potential violation of the Workday Conflicts of Interest Policy against engagement with Expert Network Firms (ENFs).



Inspiring integrity:

If a customer asks for a product roadmap that has not been finalized and announced, then say “It’s in discussion, and we hope to announce our updated roadmap soon.”
We can show we care without oversharing.

Data privacy.

At Workday, we are transparent about how we handle personal data. We’re successful when our employees, applicants, customers, prospective customers, and partners trust us to protect their privacy and handle their data as expected.

All Workmates are responsible for following global privacy laws by helping to put our privacy practices into action. Here are some examples of how to do this:

- Protect personal data by building and deploying secure, configurable products and services.
- Limit personal data collection to the data that’s truly needed.
- Ensure that a clear and accurate notice is provided when collecting or processing personal data.
- Only use personal data for legitimate business purposes consistent with the notice.
- Respect our Workmates’ and customers’ instructions related to the personal data they enter into our services and sites.
- Comply with all applicable policies and laws related to data privacy and the transfer of personal data.

Learn more about Workday privacy commitments on our [Trust site](#).

Additionally, all Workmates must be familiar with and follow our [Processor Binding Corporate Rules](#), as approved by European Union and United Kingdom data protection authorities.



Learning link:

[Workday Data Privacy Governance Policy](#)

[Customer Data Handling Policy](#)

[Workday Employment Privacy Statement](#)

[Workday Privacy Statement](#)



Inspiring integrity:

If you have concerns with how Workday is handling personal data, whether it’s your own employee data or the data a customer inputs into a Workday service, speak up! Workmates have a responsibility to understand our data privacy obligations and notify the appropriate teams if they see something that doesn’t align with Workday policies.

Protecting Workday intellectual property.

Innovation is a Workday core value. To maintain our competitive edge, we must safeguard our intellectual property, which includes inventions, product and business ideas, creative content, and other valuable information.

Learning link:

Intellectual Property @ Workday



Respecting the intellectual property of others.

Workday competes ethically. We do not use confidential information from other companies without their permission. This includes information from competitors, former employers, customers, and business partners.

Before asking for or accepting confidential information from others, ensure all parties have signed a Workday-approved nondisclosure agreement. If you inadvertently obtain such information, contact Legal, Compliance, and Corporate Affairs immediately.


When creating content for Workday, do original work. Do not copy or incorporate content owned by others without proper authorization.



Learning link:

Open Source @ Workday

Open Source Policy



Workday assets and resources.

Workday provides Workmates with information and technology (IT) resources to perform their jobs. These resources are Workday property and must be used in a manner that reflects positively on Workday and all who work here.

When doing your work, only use Workday-approved methods to communicate, store, and share information. Do not use unapproved applications for work communications, and do not save Workday information on personal devices or sites.

Limited personal use of IT resources is permitted but must not interfere with Workmates’ work performance or the work performance of others. Workday reserves the right to monitor and inspect the use of its information and technology resources. Maintain the security and integrity of the Workday network during any personal use of IT resources, including by avoiding risky sites and being very careful about transfer or storage of personal files using Workday resources.



Inspiring integrity:

Use good judgment when using Workday equipment. Always ensure that personal use does not interfere with your work environment or in any way violate our policies.

Learning link:

Workday Acceptable Use Policy



Integrity.

Workday expects everyone acting on its behalf to perform their duties with integrity and in an honest and ethical manner. Integrity is a core value of Workday and is upheld by the daily actions of every Workmate.

Providing appropriate gifts and business entertainment.

We’re dedicated to earning business through the quality of our products and services. While business courtesies—such as gifts, meals, travel, or entertainment—can foster strong relationships with customers and prospects, those that are excessive, lack transparency, or serve no clear business purpose can be perceived as bribes, which can undermine trust and damage our reputation.

Moderate, proportional, and well-documented business courtesies can create goodwill and sound working relationships. However, before any business courtesy is offered or accepted by any employee, family member of an employee, or agent, it must first meet all of the following criteria:

- Not cash
- Gift card valued at \$25 or less
- Consistent with customary business practices
- Reasonable in value
- Open and transparent
- Cannot reasonably be construed as a bribe or payoff
- Does not violate any laws or regulations
- Permitted by the recipient’s policies
- Approved by your manager

You may not receive any income or material gain from a third party in connection with the performance of your Workday duties, with the exception of nominal gifts.

Learning link:

Gifts and Entertainment Policy



Inspiring integrity:

Never offer or accept cash or cash equivalent gift cards (for example, AMEX, Visa, Mastercard).



Inspiring integrity:

Transparency and proactive communication are vital to upholding Workday ethical standards. Having a conflict of interest doesn't always violate the Code but failing to disclose it does. Speak with your manager or the Workday Integrity Team if you have a conflict.

Avoiding conflicts of interest.

We expect every Workmate to uphold our values of trust and integrity by prioritizing the company’s best interests while carrying out their responsibilities. This means avoiding situations that could create conflicts of interest where your personal interests or the interests of others could influence, or appear to influence, your decisions and actions on behalf of Workday.

Remember, even the possibility of a conflict needs attention. By being transparent and proactive and disclosing potential conflicts early on protects everyone involved by safeguarding both your interests and those of Workday. If you have any concerns about a potential conflict, please reach out to your manager and the [Workday Integrity Team](#).

Common scenarios that may lead to conflicts of interest:

- Financial interests: personal or family investments in companies that directly compete with or are similar to Workday, or that Workday has invested in
- Outside activities: outside employment, advisory roles, board seats, or personally owned businesses that could compete with or detract from your Workday responsibilities
- Business opportunities: opportunities arising from your position at Workday that you might personally benefit from
- Related-party transactions: conducting Workday business with family members or other close personal connections
- Gifts and hospitality: accepting excessive gifts, entertainment, or other business courtesies related to your role at Workday, either directly or indirectly
- Personal relationships: close personal relationships with subordinates, supervisors, or colleagues that could influence decision-making or create favoritism
- Workday investment in a company in which you are a stockholder or director

Potential conflicts of interest can be common because our Workmates are often involved in other business activities outside of their role at Workday. When there is ever a question about outside or conflicting activity, Workmates are required to properly disclose and follow all management plans designed to mitigate the conflict.

Learning link:

[Conflicts of Interest Policy](#)



Preventing improper payments.

Workday is truthful and transparent in our dealings, and we do not influence decisions through improper payments. Winning and preserving trust for Workday, as well as our integrity, is more important than any business benefit we might get from making a questionable payment. Anything of value exchanged or any payments made should be transparent, permissible under local law, and accurately reported.

- In any deal, we avoid hidden terms or arrangements.
- We do not pay or offer to pay bribes or kickbacks to anyone, in any form.
- We do not hire or offer to hire candidates in order to benefit a customer, prospect, partner, or government official.
- We prohibit corrupt payments of all kinds, including payments to secure permits or approvals, and small payments to speed up a routine government process (often known as a “facilitation payment”).
- We work with partners who have a reputation for integrity, and we report signs of any potentially unethical behavior.
- We make sure that any gifts, hospitality, or travel we offer are legal, reasonable, and appropriate. We do not provide any business courtesies to U.S. federal government officials, or to any public sector customers or prospects without preapproval by the Integrity Team.
- If we make charitable donations, we do so to support a legitimate charitable cause, not as part of an exchange of favors.
- We never solicit gifts or other business courtesies.

If you ever have a question about whether an exchange or payment is improper, contact the Workday Integrity Team for guidance.

Learning link:

Anti-Corruption Policy





Developing and using AI responsibly.

Our dedication to our core value of integrity extends to our development and use of AI products and technologies. AI introduces new areas of accountability because it is, at its core, a technology that learns and informs decisions based on set parameters. This means we are extremely deliberate about responsible AI to ensure that the impact we have is the impact we want.

The mission of the Responsible AI (RAI) program is to facilitate the Workday ambition to design, develop, and deploy innovative and trustworthy AI products that are fair, accountable, transparent, and explainable.

Our RAI framework is anchored around a set of ethical principles that guide our decisions about which AI technologies we build and use. Read more about [our principles](#).

We follow responsible AI practices.

Our principles are brought to life through a series of RAI protocols, which include guidelines and standards. The purpose of these protocols is to identify and mitigate risks to fundamental human rights such that these technologies will have a positive impact on society:

Human oversight: We ensure our AI products and technologies are built with human oversight in mind, especially where they will be used to assist with consequential decision-making about people’s work and money.

Fairness: In order to earn and maintain the trust of our customers, we take a lifecycle approach to map, measure, and manage the risk of unintended consequences resulting from our AI solutions.

Recordkeeping: We’re careful to engage in thoughtful practices related to logging and versioning of our AI solutions.

Explainability and interpretability: We work to maximize people’s understanding of the underlying mechanisms and outputs of the AI systems we build.

Utility and reliability: We benchmark the performance of our AI solutions against appropriate criteria.

Maintenance and monitoring: Through the application of systems, tools, and controls, we endeavor to understand and address AI system risks, impacts, and potential harms.

Disclosure and transparency: We prioritize our effort to make information about our AI systems available to our customers and the public, including options on how to engage with it.

We have a category of prohibited AI use cases.

In alignment with our AI ethics principles, customer expectations, and the evolving regulatory landscape, the following are prohibited:

- **Manipulation of human behavior:** AI products and technologies employing subliminal techniques or otherwise designed to deceive or manipulate users, bypassing their conscious awareness or consent
- **Exploitation of vulnerable groups:** AI products and technologies intentionally targeting or exploiting vulnerabilities based on age, disability, or social or economic situation
- **Categorization into sensitive groupings based on biometrics:** AI products and technologies that use biometric data for categorization based on sensitive personal characteristics (for example, race, ethnicity, political opinion, religious beliefs)
- **Social scoring and personality profiling:** AI products and technologies used for social scoring or personality profiling that may lead to unfair or discriminatory treatment without business justification
- **Intrusive surveillance / monitoring:** AI products and technologies that surveil passive activity data (data that is collected to observe and infer information about an individual’s activities, behaviors, or location) to do any of the following tasks: (a) make any determination about an individual's performance; (b) limit an individual or a group’s ability to engage in protected activity (for example, taking breaks, union busting, etc.); and (c) conduct individual or group disciplinary or penalization actions that can harm/limit individuals or their economic opportunity (decisions related to conditions of employment).

Learning link:

[Responsible AI Development Policy](#)

[Prohibition on Surveillance-capable AI Exception and Requirements](#)



Advertising truthfully.

Workday competes on the merits and quality of our products and services. Workday communications with customers or potential customers must be truthful and accurate. We must be able to substantiate what we say about our products and services. All promotional, advertising, and marketing materials must go through the appropriate approval process for publishing information.

Competing fairly.

Workday believes in free and open competition and outperforming our competitors fairly and honestly with superior products and services.

Never seek or use the following:

- Information about a competitor’s bid
- Proprietary information that has been copied, drawn, or photographed
- Information about a former employer solicited from an employee
- Information containing technical or engineering data that may be protected by trade-secret laws

We achieve business success through fair competition by:

- Avoiding any formal or informal agreements with competitors that limit competition or customer choice in any way
- Respecting the competitive business process by not price fixing or rigging any bidding process or helping others to do so
- Not dictating the prices our independent partners charge their customers



Inspiring integrity:

Competitively sensitive information, including any information related to pricing or bidding, should never be shared with any third parties. If a third party inadvertently shares this type of information with you, you have a responsibility to not use or share this information with anyone else.

Accurate records.

Workday must keep complete, accurate, and timely records. Good records help us make smart business decisions, and they are required to meet our financial, audit, and regulatory obligations. Workday also complies with all applicable laws to prevent money laundering, terrorism financing, or tax evasion. We never conceal transfers of funds, only accept funds received from legitimate sources for legitimate and documented reasons, and reject doing business in any way that could facilitate or assist others in violating any applicable laws.

All Workmates are responsible for the accuracy of records, whether they are entering information or reviewing it. Workmates must always:

- Create and keep truthful, clear, and accurate records, including but not limited to financial records
- Follow Workday expensing, contracting, and purchasing requirements and obtain appropriate authorization
- Reject any attempts to make agreements outside of formal records, including side agreements or any type of false, misleading, or sham transactions
- Preserve and retain records appropriately, including by storing business communications and records in appropriate places and in compliance with legal or other hold requests (avoid keeping any Workday information outside of authorized places)
- Cooperate with audits and investigations
- Never hide the true nature of any transaction
- Report any activity you believe is questionable

Workmates with financial reporting responsibilities have special ethical obligations to act with the highest levels of honesty and integrity, avoid conflicts of interest, and promote accountability. It is important for them to recognize significant risks; know when to seek legal advice; and promptly report to the Chief Executive Officer, the Chief Legal Officer, and/or the Chair of the Audit Committee any conduct that could violate applicable laws, business ethics, or any provision of this Code.



Laws and regulations.

At Workday, we play by the rules. That means we conduct our business in accordance with our core values and in compliance with applicable national, state, and local laws and regulations. Not all of those laws and regulations are covered specifically by this Code, and Workmates must familiarize themselves with applicable laws and regulations wherever they do business.

If there seems to be a difference between a legal requirement and the Code, always apply the more stringent standard. Seek guidance from Legal or the Integrity Team, particularly when a law or regulation could potentially be violated.

Trade laws.

As a global company, Workday is subject to the trade laws and regulations of the United States and other applicable jurisdictions. Workmates need to be mindful of the trade requirements that apply to the cross-border transfer of goods, services, and technologies, such as:

- Economic sanctions that prohibit us from doing business with certain countries, entities, or individuals
- Export controls and customs requirements that apply to the products, services, and technologies that we may transfer from country to country
- Anti-boycott restrictions that prohibit Workday from participating in or supporting any foreign boycott that is not sanctioned by the U.S. government



Inspiring integrity:

If you don't know whether trade or export controls might apply or what those rules are in a particular case, DON'T GUESS. Ask before you act.

Learning link:

Global Trade Policy



Insider trading.

Do not trade on inside information.

Workmates may become aware of material nonpublic information about Workday or our customers, suppliers, or partners. Trading in stock or other securities or influencing others to trade if you have material nonpublic information is considered insider trading and is strictly prohibited by both this Code and the law.

Information is **material** if it can influence someone's decision to buy or sell stock. Information is **nonpublic** if it has not yet been announced through an official channel such as a press release, the Workday blog, or filings with the Securities and Exchange Commission. Examples of this information include company financial performance; global sales opportunities; new products or services; mergers or acquisitions; major developments with customers, partners, or key employees; or other major business plans.

We all play a role in maintaining Workday's high ethical standards, trust with our shareholders and the public, and compliance with the law. You should familiarize yourself with our Insider Trading Policy so you can avoid even the appearance of improper trading.



Learning link:

Insider Trading Policy



Restricted Trading Periods.

Starting July 15, 2025, all Workmates will be subject to Workday’s restricted trading periods. Workmates are prohibited from buying, selling, or transferring Workday stock during our quarterly restricted trading periods.



Inspiring integrity:

Are you planning to sell shares of Workday stock? Keep in mind that **awareness of material nonpublic information prohibits you from trading**, even if your reason for trading is unrelated to the information in question. Please make sure to plan your sales around any upcoming restricted trading periods.

Sharing material nonpublic information with others, known as tipping, is just as serious as trading on that information yourself. You should not share any material nonpublic information with anyone outside of Workday—even your spouse, family members, and friends—and you should refrain from giving trading advice about Workday stock to anyone, even if you are not aware of material nonpublic information. Within Workday, please limit the sharing of nonpublic information to only those Workmates with a business need to know.

Government relationships.

Workday has developed valuable relationships with national, regional, state, and local governments by working fairly and honestly with officials and others wherever they operate.

Workmates must be truthful and straightforward in their dealings with governments, and may not direct or encourage anyone to provide false or misleading information to any government agent or representative.

Workmates should also keep the following in mind:

- Doing business with government agents, employees, or officials may often mean complying with additional requirements. Be mindful of this Code, the Anti-Corruption Policy, other relevant policies, and all local laws.
- Any gifts or business entertainment involving government officials must first be preapproved by the Workday Integrity Team or Legal, Compliance, and Corporate Affairs. Do not even propose business entertainment to government officials without getting approval.
- Charitable donations should never be made in order to win improper influence over a business decision or as a quid pro quo.
- Unless preapproved by Corporate Affairs, you should not imply or indicate Workday’s position on any election outcome or policy matter.
- If an investigation ever arises or reasonably could arise, contact Legal immediately. All records related to investigations must be preserved, and any potential destruction of records relevant to an investigation should be reported.

Learning link:

Public Sector Business Engagement and Interaction Policy

U.S. Government Interactions Policy



Public disclosures.

All information shared outside of Workday, whether it is with the media, investors, or the general public, must be accurate, complete, and consistent. Any disclosures made in public or regulatory communications must be full, fair, accurate, timely, and understandable.

Information about Workday or its business activities should only be shared by an approved Workday spokesperson. If you receive inquiries from the press or industry analysts, please direct them to the Workday Corporate Communications team. For financial and investment-related questions, please refer them to the Workday Investor Relations department. Do not attempt to answer these questions yourself and be sure to inform your manager about any such inquiries. For guidance on discussing Workday online, please refer to our [Social Media Policy](#).



Inspiring integrity:

Do not engage with media, analysts, or social media contacts regarding Workday matters. Direct all such inquiries to your manager or the appropriate Workday department: Corporate Communications; Investor Relations; or Legal, Compliance, and Corporate Affairs.

Our commitment to human rights.

Workday believes in the fundamental dignity and rights of every individual. Our global operations are guided by a deep respect for human rights and a commitment to responsible business practices. As we conduct business around the world, we are committed to respecting human rights.

In all of our operations we support:

- **Fair and ethical labor:** We condemn all forms of forced labor, exploitative child labor, and human trafficking and other types of modern slavery. We strive to create a workplace and supply chain free from modern slavery. We respect our employees' lawful right to freedom of association.
- **Fair and empowering employment:** We provide fair compensation to our employees, enabling them to meet their basic needs. We foster an environment where employees can develop their knowledge, skills, and abilities, opening doors for professional growth. Hiring, compensation, promotion, discipline, and all other employment conditions are based solely on an individual's qualifications and performance.
- **Diversity and inclusion:** We embrace diversity and foster an inclusive workplace where everyone feels valued and respected. We prohibit discrimination and ensure equal opportunity in all aspects of employment.
- **Safe and healthy workplace:** We prioritize the safety and health of our employees, maintaining a secure and healthy work environment.
- **Environmental responsibility:** We strive to minimize our environmental footprint through sustainable practices and responsible resource management.
- **Ethical AI development:** We develop and deploy AI technologies responsibly and prioritize fairness, transparency, and accountability.
- **Conflict-free sourcing:** We reject the use of conflict minerals and expect our suppliers to adhere to the same standards.
- **Privacy protection:** We safeguard personal data and consider privacy to be a fundamental human right.



Inspiring integrity:

Workday Giving & Doing provides information about our community activities and the permissible use of company resources.

Corporate social responsibility.

Political contributions.

Workday believes that exercising your right to vote is one of the most important things we can all do and respects the right of its employees to participate in the political process. You may choose to support the political process through personal contributions but they may not be on behalf of Workday. You also may volunteer your personal (not work) time to the candidates or organizations of your choice, as long as it does not use any Workday resources such as company facilities, email, computers, or supplies.

Charitable contributions.

Workday encourages our employees to volunteer and give back by offering fundraising and volunteerism matches to organizations in which employees are personally involved. Any other support for charities or other nonprofit institutions using Workday resources needs to be approved properly. Donations made to charities by Workday are subject to our Sponsorships and Charitable Donations policy and approval process. Donations using Workday resources can never be made to gain an improper business advantage, as a quid pro quo, or for employees' personal benefit.

Environmental sustainability.

Workday is committed to caring for our people and the planet. Our Sustainability Team leads the environmental sustainability efforts that support our commitments to stakeholders and align with our core values. Please read our [Global Impact Report](#) to learn more about the topics that are important in our effort to build a successful company while reducing our environmental impact.

We must comply with all applicable environmental laws and regulations, and we expect our suppliers and partners to do the same. Our Supplier and Partner Codes of Conduct outline our sustainability expectations. Contact sustainability@workday.com to learn more.

Learning link:

Sponsorships and Charitable Donations Policy

Global impact.

Through the Workday Foundation and our Workmates' deep commitment to both giving and doing, we take pride in getting involved in our communities around the globe in a variety of ways. Our community investments of time, expertise, and direct contributions are core to our Workday culture.

We have three main priorities that guide our community investments:

- **Workmate contributions:** We support Workmates who want to become involved in their community.
- **Pro bono contributions:** We devote Workmate time and talent to help solve social issues through skills-based consulting projects.
- **Philanthropic contributions:** We invest in workforce development initiatives to increase economic self-sufficiency for under-resourced populations.



Learning link:

Environmental Sustainability Policy

Administration, waiver, and amendment.

The Workday Board of Directors, directly or through its committees, oversees compliance with this Code and has the authority to amend it as needed. To ensure adherence to the Code, the Workday Chief Integrity and Compliance Officer reports to the Board and/or its committees.

Waivers: Any waiver of a provision in this Code for executive officers and directors requires approval from the Board or the appropriate Board committee in accordance with Nasdaq listing requirements. Any such waivers will be publicly disclosed as required by applicable laws and regulations. For all other Workmates, waivers may be granted in writing by the Workday Chief Legal Officer.

Amendments: Workday is committed to continuously reviewing and updating its policies and procedures; therefore, this Code may be amended by the Board of Directors or its delegates to reflect evolving best practices and regulatory requirements.

