



UBER

# Business Conduct Guide

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# Let's do it right

Let's transform the way people around the world move, live, and work.

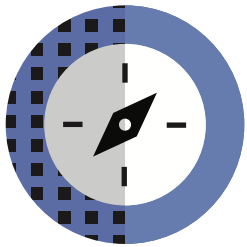
Each of us has a responsibility to treat each other and grow our business with integrity. The Business Conduct Guide helps us achieve our goals by providing resources to answer legal and ethical questions.

If you have questions as you use the Guide, please reach out to the Global Compliance Team at [compliance@uber.com](mailto:compliance@uber.com). We're here to help.



## Making the right decision

Use this framework to help make the right decision.



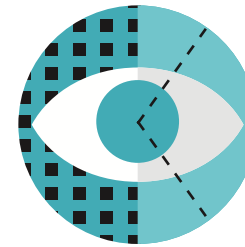
### Purpose

- Why am I doing this?
- Is it legal? Is it the right thing to do?



### Process

- Did I follow the right steps?
- Did I consult the right experts?



### Perception

- How does this look to riders, drivers, regulators, employees, media?
- How would this look in three to four years in the future?



## Speak up

Everyone should feel comfortable speaking up, particularly with concerns about how we conduct our business.

You are responsible for knowing and following the policies in this Business Conduct Guide. It's important to raise questions if you are not sure what to do. We're better as a company when you exercise your power to prevent mistakes or wrongdoing by asking questions and offering solutions.

Reach out to your manager first. Managers have a responsibility to create an open and supportive environment where their team feels comfortable raising concerns and questions. If you cannot reach your manager, or if you are not comfortable raising the issue with your manager, reach out to the A-Team, People Team, Global Compliance, Internal Audit, or the [Uber Integrity Helpline](#). We do not tolerate retaliation against employees who raise genuine concerns in good faith.



## Be yourself & treat each other well

We are committed to fostering an environment where ALL people are welcome and supported.

We are more productive, more creative and happier when each of us can be our authentic self. Uber is committed to providing this kind of freedom by encouraging all employees to adopt a hyper-tolerance where all people, from all walks of life, are welcome and fiercely supported.

Our [Employee Handbook](#) for the country where you are employed sets forth the foundational guidelines that ensure we treat each other well. Please read the Handbook in its entirety. We highlight a few principles here that are important to all of our workplaces around the world.

Having a diverse workforce – made up of team members who bring a wide variety of skills, abilities, experiences and perspectives

– is essential to our success. We are committed to the principles of equal employment opportunity, inclusion and respect. We do not tolerate discrimination in any form against anyone.

Every Uber employee has a right to a work environment free from harassment. Harassment can include any behavior (verbal, visual or physical) that creates an intimidating, offensive, abusive or hostile work environment.

We are committed to compliance with human rights laws. We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Uber does not use or condone the use of

slave labor or human trafficking and denounces any degrading treatment of individuals or unsafe working conditions.

We are committed to the safety and security of our employees and property. Threats, intimidation and violence in our workplace will not be tolerated. You may not possess firearms, other weapons, explosive devices or dangerous substances or materials in the workplace.

If you believe you or any other employee has been subjected to any form of discrimination, harassment, or retaliation, notify your manager, the People Team, or the [Uber Integrity Helpline](#).

## Giving back

Giving back is in our DNA. You can participate in company-sponsored projects or your own projects. Or both.

We participate in many humanitarian and charitable endeavors. That participation ranges from cash contributions to donations of Uber resources. When we choose to participate in a community project and utilize limited employee time and company resources, site management communicates to employees in advance that the effort is a company-sponsored project.

Be sure to separate your personal community activities from your work. Pursue community activities on your own time, with your own resources, as an individual private citizen, and not as a representative of Uber. Do not claim to represent, or imply representation of Uber to the public or in any public process or forum, unless specifically requested to do so by management. And never contribute to a charitable organization or cause in exchange for obtaining business for Uber.



## Telling our story

Uber has a positive impact on communities throughout the world. Sharing our story with the press and on social media allows us to counter misperceptions.

The Policy & Communications Team has tools and guidance on how to help you engage with the press and on social media.





## Communicating with the media

Loop in the Policy & Communications Team on all media requests and inquiries.

Uber is a high-profile company and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information, you should direct all media inquiries to [press@uber.com](mailto:press@uber.com). No one should speak to the press without first receiving permission from the Uber communications team.



## Social media

Social media has the potential to affect Uber's reputation. Use it wisely.

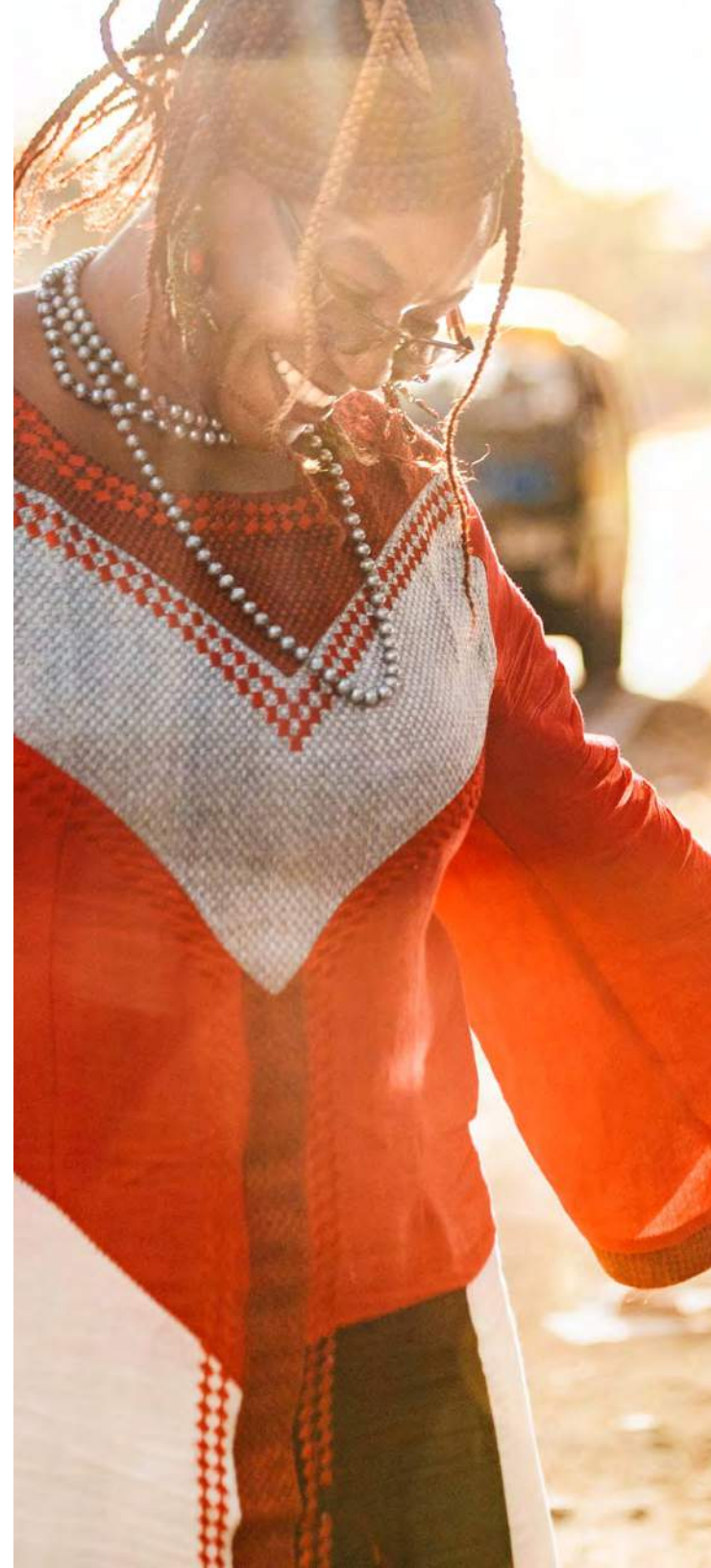
Social media provides unique opportunities to share stories about our business and to listen, learn and engage with users and communities. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, the [Employee Handbook](#) sets forth guidelines for the appropriate use of social media. Please refer to the Employee Handbook for your region for those guidelines.



## Conflicts of Interest & Government Relations

Uber does not buy market access, business, or policy outcomes with money, gifts, or other perks.

Our continued success depends on building good relationships with customers, shareholders and governments. Let's do it right.



## Be loyal

Put Uber's interests above your own interests when making business decisions.

At times, we may be faced with situations where the business actions we take on behalf of Uber may conflict with our own personal or family interests. This issue could come up because the course of action that is best for us personally may not also be the best course of action for Uber. We owe a duty to Uber to advance its legitimate interests.

Determining whether a conflict of interest exists is not always easy to do. Even an appearance of a conflict can look bad. Employees with a question regarding a conflict of interest should seek advice from their manager. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must first notify their direct manager and seek review by completing the [Outside Projects Disclosure Form](#).

Here are examples of conflicts of interest that you must discuss with your manager:

- ✓ **Conflicting Employment:** You or a family member is working or consulting for a competitor or potential competitor.
- ✓ **Nepotism in Hiring:** Hiring or supervising family members or others with whom you have a close, personal relationship.

- ✓ **Nepotism in Business Transactions:** Awarding Uber business to a company owned or controlled by an Uber employee or his or her family.
- ✓ **Board Service:** Serving as a board member for an outside commercial company or organization.
- ✓ **Investments:** Owning or having a substantial interest in a competitor, supplier or contractor.
- ✓ **Interested Party Transactions:** Having a personal interest, financial interest or potential gain in any Uber transaction, separate from being an Uber employee and shareholder.
- ✓ **Gifts:** Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Uber employees.



## Receiving gifts & business entertainment

Employees may accept modest, unsolicited gifts and business entertainment. Never money or gift cards.

We should avoid any actions that create a perception that Uber sought, or received, favorable treatment from outside entities in exchange for business courtesies such as gifts, gratuities, meals, refreshments, entertainment or other benefits.

However, employees may accept unsolicited business courtesies of modest value that promote successful working relationships and goodwill with our business partners. A good rule of thumb is whether you would be comfortable telling your manager or having it known by the public. Be transparent.

Employees who award business or who can influence the allocation of business must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing.



## Giving gifts & entertainment

Employees may give modest gifts, but not to gain an unfair business advantage.

We may give modest gifts, swag, meals, and entertainment, so long as we follow local laws and the recipient's internal policies. An employee may never use personal funds or resources to do something that cannot be done with Uber resources. Accounting for business courtesies must be done in accordance with approved company procedures and accurately entered in Expensify.



## Special rules for dealings with governments

Be mindful of additional requirements regarding government officials.

Global anti-corruption laws and Uber policy prohibit improper influence and giving anything of value, such as financial payments, gifts, travel, inbound investment, service agreements, partnerships and political contributions to government officials and employees in exchange for business or policy outcomes. These laws apply globally, not just in the United States, and cover not only Uber employees and contractors, but also third parties we retain, such as consultants and lobbyists.

Uber's [Global Anti-Corruption Policy](#) explains how to interact with government agencies and officials when driving our business forward, including when retaining third parties who interact with the government on our behalf. In some circumstances, hiring a close relative of a government official as an employee could be interpreted as providing a benefit in exchange for a favorable government decision.

The [Global Policy for Hiring Relatives of Government Officials](#) describes how to consider and potentially hire close relatives of government officials in compliance with legal requirements. Finally, [Uber's Corporate Policy on our Applications and Government Employees](#) explains permitted and prohibited uses of our applications and practices relative to government officials.



## Political activities & contributions

We should educate policy makers and participate in the public dialogue on policy issues that impact our business.

You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. You may not conduct these activities on company time or use company resources.

If you express a personal view in a public forum (such as a letter to the newspaper), do not use Uber letterhead, company e-mail, or reference your business title or address. You may not make or commit to making political contributions on behalf of Uber.

The [Employee Political Activity Policy](#) requires you to obtain pre-approval from the Political Law team before making or soliciting any personal political contribution in the United States. Request pre-approval via [this form](#).





# Competing Fairly

We compete fiercely and fairly  
and on the merits.

We make every effort to abide by the antitrust and competition laws  
of all countries where we do business.



## Competitors & fair trade practices

We support fair competition and free access to markets.

Antitrust and competition laws around the world are designed to promote fair competition. They prohibit collusion among competitors (for example, agreement on prices, discounts, incentives, geographic allocation or exchanging commercially sensitive information) as well as conduct that results in an unjustified “monopoly” position.

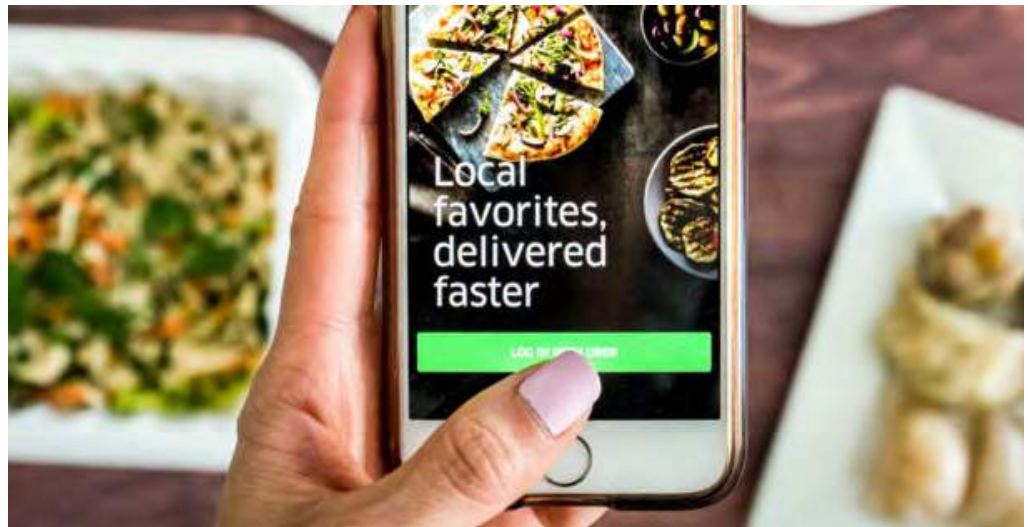
**Uber’s policy** is to comply with the antitrust and competition laws of all countries in which we operate. Because of the complexity of these laws and the potential legal consequences of violating them (including large fines and criminal penalties), Uber employees must consult Legal ([competition@uber.com](mailto:competition@uber.com)) if they face a situation they believe may involve antitrust or competition law issues.



## Accurate marketing

We accurately represent Uber and our services in our marketing, advertising and sales materials.

We can promote our products and make comparisons between us and our competitors. Deliberately misleading messages, leaving out important facts, or false claims about our products or competitors are inconsistent with our policies and Cultural Values.



## Competitive intelligence

We may only gain information about our competitors from legitimate sources.

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. It helps us stay competitive in the marketplace. However, we must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, and information available from reliable Internet sources. These rules also apply to the consultants, vendors, and other partners whom we hire. If you have questions, contact [competition@uber.com](mailto:competition@uber.com).





## Protect Uber's Information & Assets

Riders, drivers and employees entrust us with their information. We are building products, tools and systems to honor their trust.

One of our most important assets is our confidential information. Employees who have received or have access to confidential information must take care to keep this information confidential.



## Rider & driver partner information

Riders and drivers trust us with their confidential and personally identifiable information.

Uber's [Employee Privacy Statement](#) outlines how we collect, access, use, share, retain, and delete such information. Uber's [Network Acceptable Use Policy](#) prohibits employees from accessing riders' and driver partners' information without a legitimate business purpose tied to an employee's role and responsibilities.



## Employee personal information

Our employees' privacy is as important as drivers' and riders' privacy.

Uber's [Employee Privacy Statement](#) describes the data that Uber may collect in connection with your employment, and how that information may be accessed, used, transferred and disclosed. The Employee Privacy Statement describes the steps that Uber takes to prevent unlawful or unauthorized processing of employee's personal information and the accidental loss of or damage to such information.



## Company equipment

Use Uber's equipment for Uber business.

Uber's assets, including computers, phones, email and information, are meant to be used for the benefit of the company. These assets are not for personal gain or for the benefit of others outside of Uber. It is your responsibility to keep Uber's assets safe from loss, theft, damage, or fraud (which includes inappropriate use). Your use of Uber's assets is subject to the [Employee Privacy Statement](#) and the [Network & Device Acceptable Use Policy](#).





## Contracting, Financial Reporting & Recordkeeping

We are transparent, honest and accurate when entering into contracts, disclosing financial information, and maintaining records.



## Contracts & trade compliance

We follow procurement and trade compliance laws.

Our [Global Procurement Policy](#) provides guidelines and establishes procedures for all Uber employees in any situation where they are involved in a purchasing process. U.S. federal law requires that subcontractors follow certain government procurement rules related to ethics and business conduct. You are expected to know and comply with all government procurement rules applicable to our business.

Uber complies with global import and export laws and regulations that impact with whom we can do business (People), where we operate (Places) and the transfer of sensitive technologies (Products).

- ✓ **People.** Our systems and processes have been designed to facilitate compliance with payments to drivers and suppliers, as well as hiring employees and contingent workers, so use established systems and processes for all financial transactions and hiring decisions.
- ✓ **Places.** We currently are prohibited from operating in Cuba, Iran, North Korea, Sudan, Syria and the Crimea region of Ukraine

without a license. Contact [compliance@uber.com](mailto:compliance@uber.com) if you want to explore doing business in or with individuals in these geographies to ensure we do so lawfully.

- ✓ **Products.** Sensitive technologies, including those that support autonomy, may require licenses for import and export. If you are involved in these activities you are responsible for knowing and following these laws. Contact [compliance@uber.com](mailto:compliance@uber.com) with questions.

We do not cooperate with foreign boycotts that are not approved by the U.S. government. If you receive a request related to any boycott, contact [compliance@uber.com](mailto:compliance@uber.com) and do not respond to the request.

Money laundering is conduct designed to disguise proceeds of criminal activity by individuals or entities. We forbid knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion.

## Accurate financial & public disclosures

We are responsible for providing accurate, complete and clear information about our business.

We are responsible for ensuring that financial reports and public filings meet legal requirements or accounting standards. Investors count on us to provide accurate information so they can make informed decisions. Never make a false or misleading entry.

It is also your responsibility to be transparent, cooperative and complete with outside accountants regarding any audit or review of our company's financial statements. If you have reason to believe that any of our company's books and records are being maintained in a materially inaccurate or incomplete manner, you are required to report this immediately to the A-team, the Internal Audit or the Uber Integrity Helpline.



## Corporate recordkeeping

Our records make up our corporate memory and contain information critical to the continuity of our business.

We create, retain and dispose of our company records as part of our normal course of business in compliance with Uber's [email](#) and [document retention](#) policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books according to Uber's policies and other accounting principles.

We must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an internal independent audit of Uber books, records, processes or internal controls.





## Help

If you come across an issue not addressed within the sections of this Guide or Q&A page, you may contact the following resources for answers to specific questions pertaining to your everyday work.

If you are exploring a potential business relationship with a political entity, and for other similar questions, please contact [political-law@uber.com](mailto:political-law@uber.com).

For questions on legal matters and communication, contact [litparalegals@uber.com](mailto:litparalegals@uber.com).

For questions on privacy and security, contact [privacyteam@uber.com](mailto:privacyteam@uber.com).

Contact [competition@uber.com](mailto:competition@uber.com) for questions on competitive practices, including before attending any meeting with a competitor, because such meetings may raise antitrust concerns.

For questions regarding contracts, recordkeeping, financial reporting, or anti-corruption questions, contact [compliance@uber.com](mailto:compliance@uber.com).

To raise a concern with the Uber Integrity Helpline, call (800) 461-9330 or go [online](#).

For questions pertaining to topics such as Uber's social media policy, access the [Employee Handbook](#).

Uber's [Global Anti-Corruption Policy](#) explains how to interact with government agencies and officials when driving our business forward,