



The World's Identity Company™

Code of Conduct

Effective as of December 19, 2024





San Francisco Office



A message from our CEO



Fellow Oktanauts,

At Okta, our values and guiding principles are more than just words – they are the foundation of everything we do. They define how we operate, how we treat each other, and how we engage with the world around us. Acting with integrity, treating everyone with respect, practicing honesty in all our dealings, prioritizing security, and fostering safe environments are commitments we bring to life everyday. Our vision to free everyone to safely use any technology relies on the trust we earn and maintain. This trust is built by safeguarding the identities of our customers' workforces and consumers. Acting with integrity is a guiding principle for how we work with each other, our customers, our partners, and extended community as we help build a world where identity belongs to you.

While doing the right things often comes naturally, this Code of Conduct serves as a compass ensuring that you are making decisions that are aligned with our values, guiding principles, and ethical business practices. It's a tool to help foster trust in each other and those we serve. We all play a vital role as builders and owners of our company and culture, and our shared commitment to honesty, accountability, and respect makes this possible. Each of us has a responsibility to follow the letter and spirit of this Code, and we encourage you to raise questions and report concerns. By doing so, you help strengthen the foundation of trust that binds us together.

Thank you for all that you do to support our customers, our communities, and each other.

Todd McKinnon
CEO and Co-Founder



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01

We take ethical conduct seriously



01 We take ethical conduct seriously

For vendors and partners, we have an additional set of expectations contained in our [Partner Code of Conduct](#)

This Code of Conduct (the “Code”) describes Okta’s values and the principles that guide our actions when conducting business on behalf of Okta, Inc. and its subsidiaries (collectively, “Okta”). Okta is committed to acting ethically and in compliance with all applicable laws. Okta’s success depends on all of us continuing to foster an ethical culture. Everyone at Okta – including directors, officers, employees, interns, contract workers, and temporary workers (collectively, “Personnel”) – is required to read, understand, and follow the letter and spirit of the Code and related policies. We also expect our partners and others who may perform work for us to follow this Code to the extent it applies to their work with us or on our behalf. Failure to comply with the Code or our other policies and guidelines could put you, your colleagues, and Okta at risk and may result in disciplinary action, up to and including termination of your relationship with Okta.

This Code does not list every legal or ethical issue that you may face while conducting Okta business. This Code is meant as a framework to guide your actions and to be applied (along with any other applicable Okta policy) using your common sense and good judgment. If you face a situation that is not covered by this Code or other Okta policy, ask yourself these questions before taking a business action:

- Is it legal, ethical, and socially responsible?
- Is it consistent with both the letter and the spirit of the Code, other Okta policies, our values, and our guiding principles?
- Would I be comfortable if it appeared publicly?
- Am I confident that it would not harm my or Okta’s reputation, negatively impact my ability to do my job, create security risks for Okta or our customers, or otherwise potentially harm Okta?
- Is it the right thing to do?

If the answer to any of these questions is “no,” then you should avoid taking the action or seek guidance through the channels set forth in this Code.



Role of managers

As company leaders, our managers have a special responsibility to uphold our values, principles, and Code, set the right tone for their teams, and manage with respect. If you are a manager, you should:

- Lead by example and hold yourself to the highest ethical and professional standards;
- Ensure that each person on your team understands and complies with the Code and other Okta policies and guidelines;
- Cultivate an environment where team members feel comfortable raising concerns without fear of retaliation;
- Diligently and proactively review and approve Personnel activities where required by applicable policies and guidelines;
- Listen carefully to make sure you understand any questions or concerns, ask clarifying questions for additional information, seek help if needed, and take prompt action to address and resolve the issue; and
- Escalate matters that may indicate a violation of law, the Code, or any other Okta policy through the appropriate reporting channels listed below.

The Code and the law

Across the various cities, states, provinces, and countries where we do business, we are subject to many different laws, including those relating to employment, governance, compliance, data privacy, and security. The Code and our other policies and guidelines are intended to help you navigate applicable laws and regulations. In many instances, the Code and our policies and guidelines exceed Okta's legal requirements. However, if our internal guidance ever conflicts with an applicable law, then we follow the law. Local custom or business practice do not provide an exception to the standards set out in the Code. To the extent there are any conflicts between the Code and any other Okta policies or procedures, the more restrictive requirement applies.

For more information:
• [People Manager Resource Site on The Landing](#)



Chicago Office

02

Our vision,
values &
guiding
principles



02 Our vision, values & guiding principles

Our vision

Okta's vision is clear and ambitious:

To free everyone to safely use any technology

Our values

Okta's values are at the heart of everything we do, and we strive to embed these values in our day to day activities and interactions.

1. Love our customers.



Loving our customers has always been a differentiator in how we operate. Our customers are at the heart of what we do, and we're only successful as a company if they are.

As we've grown from a tiny startup into a market and thought leader, we've maintained our grounding in customer-centricity. You see this value in all of our work, from security updates that better protect our customers to product innovation stemming from customer needs. When we say we love our customers, we truly mean it!

2. Always secure. Always on.



This value reflects our ongoing commitment to making every employee an owner of security. It guides our decision-making and our outcomes over the long term. What does this mean for Okta as a company? It means we never jeopardize the security and reliability we promise. It means we aim to eliminate every risk, even if there's a one-in-a-million chance of it materializing.

How are we doing this? By investing in market-leading products and services, hardening our corporate infrastructure, championing customer best practices, and raising the bar for our industry.

For more information:

- [Our Values](#)



3. Build and own it.

We are committed to creating an environment where employees can be their best selves, inside and outside the workplace. We work to ensure employees can see a direct connection between their effort and results and understand how their work fits into the broader company vision.

We foster a culture where employees care deeply about the work we do and who we do it with, with a high sense of ownership and accountability for results. As builders and owners, we know that we do our best work as a team. It reminds us not to think like individuals or within the scope of our departments but as a whole. We take accountability for the impact and outcomes of our work.

4. Drive what's next.

Driving what's next means we're always thinking and moving proactively. We never stop evolving, and we never settle for less than excellence. We're living and working in a fast-changing industry with an increasing number of threats, so we need to be on the offensive to move quickly and safeguard against the current and future landscape.

We keep learning and growing and aren't afraid to experiment. We move with speed to innovate and live up to our potential. All of this enables our goal to provide the best product and experience to our customers, partners, users, and broader network.

Our guiding principles

At Okta, we are committed to conducting business ethically and in a manner consistent with our guiding principles: integrity, respect, honesty, security, and safety. Okta's reputation and success depend on all of us continuing to foster an ethical culture.

- Integrity** We act with integrity and always do the right thing, even when no one is looking
- Respect** We treat everyone with respect and value each other's differences
- Honesty** We are honest in all of our business dealings
- Security** We prioritize security and never take shortcuts
- Safety** We cultivate a safe environment where everyone is able to bring their best self to work



Tokyo Office

03

We seek guidance and
raise concerns



03 We seek guidance and raise concerns

We believe asking questions and raising concerns helps us listen, learn, improve, and strengthen our ethical culture. We all benefit when we are empowered to prevent mistakes or wrongdoing by speaking up and asking questions. If you encounter a scenario where you have a question about the Code's applicability or are unsure of the best course of action, you should seek guidance from one of the resources listed in this section. We encourage you to speak up if you become aware of any circumstances that may be inconsistent with or in violation of this Code or other Okta policies. Your prompt disclosure helps us resolve concerns in a thorough and timely manner. Additionally, people managers are required to report immediately any potential violations they witness or become aware of, and any complaints they receive about such conduct.

Ways you can seek guidance and raise concerns at Okta

Talk to Your Manager

Our management is here to discuss any compliance or ethical concerns. All managers must escalate any reports that they receive related to known or suspected violations of this Code, our policies, or legal requirements.

Talk to the People Team

The Employee Relations & Compliance team and your People Business Partner are available to address any concerns.

Talk to the Office of Ethics & Compliance (OEC)

You may contact OEC at ethics@okta.com for guidance or to raise concerns.

Make a report through our Ethics Reporting Line

If you prefer, you may report through our Ethics Reporting Line, a third-party hosted, confidential reporting system, online at okta.ethicspoint.com or by phone at +1-844-231-3575 in US/Canada. International phone numbers can be accessed via the Ethics Reporting Line website by selecting the country in which you are located via the drop-down menu. Anonymous reports can be made via the Ethics Reporting Line, subject to applicable law and regulation. Anonymous reporters are particularly encouraged to include as much relevant information as possible to enable us to thoroughly assess the concerns raised. The Ethics Reporting Line is available 24 hours a day, 7 days a week.



You should always seek to report to someone you believe is neutral and not directly involved in the conduct you are concerned about. Personnel who become aware of a suspected violation should not attempt to investigate it or take action on their own.

We encourage you to report any concerns internally so we can investigate and resolve them. You are not prohibited from disclosing information to external reporting agencies in accordance with applicable law or regulation.

Good faith reporting and non-retaliation

Personnel must report concerns in good faith. Good faith reports are those made with a reasonable belief in the truth of the report. Anyone who intentionally or negligently makes a false report or provides false or deliberately misleading information in connection with an investigation of a report may face disciplinary action, up to and including termination of employment.

We strictly prohibit and will not tolerate any threatened, attempted or actual retaliation against anyone who: (i) formally or informally makes a good faith report; (ii) assists someone else to make a good faith report; (iii) has a personal relationship with someone who makes a good faith report; or (iv) participates in or is otherwise involved in an investigation or other proceedings in relation to a report made (including any individual accused in the report), regardless of whether the report is determined to be substantiated or unsubstantiated following an investigation. If you witness or are subject to any acts that appear to be retaliatory, you should immediately report this through the channels listed in this Code.

All reports will be investigated thoroughly

We take all reported concerns seriously. We will listen, investigate any reports of potential violations of Okta's Code, policies, or the law, as warranted, and take corrective action as needed. All concerns and investigations will be addressed with appropriate sensitivity and confidentiality. All Personnel are required to cooperate fully with any company investigation.



Sydney Office

04

We act with integrity



04 We act with integrity

We comply with all applicable laws, rules, and regulations

We strive to conduct our business in compliance with all applicable laws, rules, and regulations in all of the countries in which we conduct business. You may not engage in any unlawful activity in conducting Okta's business or in performing your day-to-day company duties, nor should you instruct others to do so. You are obligated to conduct business ethically and to use good judgment. If you have questions about the legal requirements in a particular country, you should contact the Office of Ethics & Compliance (OEC) at ethics@okta.com to ensure compliance with local laws and Okta's policies.

We prohibit bribery in all forms

We conduct our business with integrity and in compliance with all applicable laws related to anti-corruption and bribery, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and similar anti-corruption laws of other nations (together, the "Anti-Corruption Laws"). All Personnel and business partners acting on our behalf are prohibited from engaging in bribery, kickbacks, or corrupt conduct in any way related to our business. You are required to comply with our Anti-Corruption Policy, the Anti-Corruption Laws, and all other applicable anti-bribery and anti-kickback rules and regulations in the course of your work on behalf of Okta. Failure to comply with these laws may result in civil and/or criminal fines to Okta and other collateral consequences, as well as significant harm to our reputation. Such a failure may also result in civil and criminal penalties being imposed on you.

We can be held liable for the acts of our resellers, agents, consultants, and other business partners for business conducted on Okta's behalf. We seek partners who share our values and our commitment to ethical business practices, and we evaluate our third party partners prior to engaging with them. If you suspect that any of Okta's partners may be making improper payments or providing improper inducements, you should promptly report this to the Office of Ethics & Compliance (OEC) at ethics@okta.com or via one of the other methods listed in Section 3 of this Code.

For more information:

- [Anti-Corruption Policy](#)
- [Gift, Entertainment & Hospitality Policy](#)



We follow all policies governing gifts, entertainment, and hospitality

Exchanging gifts, entertainment, and hospitality can, in some cases, create a conflict of interest or an unfair bias that could be seen as an attempt to improperly influence business decisions, especially if the item is lavish. Although infrequent and moderate business meals and entertainment with customers or other third parties can be appropriate aspects of some business relationships, you must ensure that they don't create the appearance of impropriety and are in compliance with our Travel & Expense Policy, Gift, Entertainment & Hospitality Policy, and Anti-Corruption Policy.

We interact properly with government entities and officials

We do business with government entities around the world. Government entities are highly regulated, so there are unique legal, ethical, and other requirements that apply to Okta and our Personnel in connection with providing services to government entities and interacting with government officials. All Personnel who support our government customers or interact with government officials must understand and comply with all applicable policies and procedures, including the special rules for Government Officials in our Gift, Entertainment & Hospitality Policy. Any interactions with government officials that are not sales-related require oversight from our Government Affairs team.

We do not make political contributions on Okta's behalf without proper authorization

Corporate contributions to political campaigns are strictly regulated by federal, state, provincial, and local law in the United States and other jurisdictions. Accordingly, all political contributions proposed to be made with Okta's funds or on Okta's behalf must be coordinated through and approved by the Office of Ethics & Compliance (OEC) and must comply with applicable law. Without the prior approval of OEC, you may not use any of Okta's funds for political contributions of any kind to any political candidate or holder of any national, state, provincial, or local government office.

As a general matter, these requirements do not restrict you from making personal political contributions, so long as you do not represent that you are making any such contribution on Okta's behalf. Additional restrictions on individual political contributions may apply in countries outside the United States, and in certain states and localities within the United States. If you have questions about whether an individual contribution may implicate such laws, please reach out to OEC at ethics@okta.com.

For more information:

- [Gift, Entertainment & Hospitality Policy](#)
- [Anti-Corruption Policy](#)
- [Travel & Expense Policy](#)
- [Gift, Entertainment & Hospitality \(GEH\) page on The Landing](#)



We promote fair dealing and compliance with competition laws

We comply with antitrust and competition laws throughout the world and we promote fair competition and trade practice. We must deal fairly with our customers, suppliers, partners, service providers, competitors, Personnel, and anyone else with whom we have contact in the course of performing our work for Okta. You may not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of facts, or any other related practice.

You are prohibited from engaging in any conduct that would violate antitrust laws, including, for example:

- Agreeing with competitors or partners about pricing (price fixing)
- Agreeing with competitors to coordinate bids (bid rigging) or divide a market
- Agreeing with competitors to boycott a particular customer, partner, or supplier
- Sharing competitively sensitive information with competitors
- Agreeing with other companies not to hire their respective employees or compete for customers

If you ever learn of or are involved in discussions where these topics come up, you must immediately contact the Office of Ethics & Compliance (OEC) at ethics@okta.com. Failure to comply with antitrust and competition laws can lead to significant risk to Okta and individual Personnel.

We comply with global trade regulations

We are committed to conducting business ethically and in compliance with all applicable U.S. and global export and economic sanctions laws, rules, and regulations. Compliance with these laws, rules, and regulations is a critical component of our success and reputation. Our trade compliance program prohibits any export, re-export, import (whether of a service, a commodity, technical data or technology) or any other transaction that violates these laws and regulations or otherwise violates our policies and procedures. All Personnel are required to comply and conduct affairs in accordance with applicable U.S. and global export and economic sanctions laws and regulations.

For more information:

- [Export Controls and Economic Sanctions Compliance Program Policy](#)
- [IP Access Policy](#)
- [Trade Compliance page on The Landing](#)



We do not trade on inside information

In the course of your work at Okta, you may learn material non-public information that would give you an unfair advantage in trading the stocks of Okta or other publicly-traded companies (also known as “insider information”). Information qualifies as “insider information” if it is non-public information that a reasonable investor would consider important in deciding whether to buy, sell, or hold a stock or other security, or if the information is likely to have a significant effect on the market price of the security. Examples of material non-public information may include, but are not limited to, unannounced information about key contracts or proposed contracts with customers or suppliers, proposed acquisitions or divestitures, cybersecurity events, financial results, significant litigation or pending regulatory actions, or new products.

If you have inside information about Okta or another company, you must not trade in that company’s stock, advise anyone else to do so, or communicate the information to anyone (i.e., “tipping”) until the information is disseminated to and absorbed by the public or is no longer material. For additional information, refer to our Insider Trading Policy. If you have questions or are uncertain of the requirements of the policy, you should reach out to Okta’s Stock Administration team.

We communicate appropriately

Our commitment to building and maintaining a strong reputation and brand means that all information disseminated outside of Okta (for example, to the media, investors, or the general public) must be accurate, complete, and consistent. To that end, you must direct all inquiries from: (i) the media and industry analysts to our Corporate Communications team; (ii) investors or the investment community to our Investor Relations team; and (iii) anyone regarding a lawsuit, government inquiry, or other dispute-related legal matter to our Litigation team. You should never discuss Okta with the media, investors, or analysts unless you have been explicitly authorized to do so by the Corporate Communications team or the Investor Relations team.

You also must obtain approval from your manager and the Corporate Communications team before accepting any public speaking engagement where you will discuss Okta, its products or services, or your role.

For more information:

- [Insider Trading Policy](#)
- [Okta Equity page on The Landing](#)
- [Contact Stock Administration team](#)

For more information:

- [Insider Trading Policy](#)
- [Social Media Policy](#)
- [Employee Social Media Guidelines](#)
- [Contact Corporate Communications team](#)
- [Contact Investor Relations team](#)



We are thoughtful in our use of social media

You should be thoughtful in your online communications and ensure that you:

- Do not disclose any confidential information or trade secrets;
- Do not comment on legal matters;
- If discussing the company or Okta products, be transparent about your relationship with the company and be clear that your statements are your own opinion, not those of the company;
- Do not post anything that might be viewed as a threat, harassment, or bullying;
- Do not post anything that may be perceived as disrespectful to other employees, our customers, partners, suppliers, or competitors.

Okta's Social Media Policy provides more guidance on discussing Okta online.

For more information:

- [Social Media Policy](#)
- [Employee Social Media Guidelines](#)



Bengaluru Office

05

We value and empower
our people



05 We value and empower our people

Fostering a culture of inclusion and belonging where all can thrive is imperative to our continued growth and success as a company. We are dedicated to enhancing our systems and structures to promote fairness, flexibility, and a feeling of belonging.

We foster diversity, equity, and inclusion

At Okta, we believe our people are our most valued asset, and we are committed to creating and maintaining a diverse and inclusive culture in which we celebrate our differences. We know that having a diverse workforce with a wide range of backgrounds and perspectives and creating a culture of belonging are foundational to our success. To learn more, see our State of Inclusion at Okta Annual Report (available at <https://www.okta.com/diversity/>).

We prohibit discrimination, harassment, and bullying

It is the responsibility of all Personnel, as well as those with whom we do business, to foster and maintain a respectful workplace culture that is free of harassment, bullying, intimidation, bias, and unlawful discrimination of any kind. Okta should be a safe and welcoming space for people of all backgrounds.

If you believe you've been discriminated against or harassed by anyone at Okta, or by a partner, vendor, or any other person doing business with Okta, immediately report the situation via one of the methods listed in Section 3 of this Code. Managers who learn of any such situation must immediately report it to the People team via their People Business Partner or the Employee Relations & Compliance team.

For additional information, see Okta's Policy Prohibiting Harassment, Discrimination, Bullying and Retaliation.

We provide equal opportunity

Okta is an Equal Opportunity Employer, and we prohibit discrimination on the basis of race, religion, color, sex, gender, gender identity, sexual orientation, age, medical condition, physical or mental disability, national origin, veteran status, or any other basis covered by applicable law. We make all employment decisions on the basis of qualifications, merit, and business requirements.

For more information:

- [Equal Employment Opportunity and Affirmative Action Statement](#)
- [Policy Prohibiting Harassment, Discrimination, Bullying and Retaliation](#)
- [State of Inclusion at Okta Annual Report](#)



We create a workplace that is safe and secure

For more information:

- [Physical Security, Health & Safety Policy](#)
- [Global Workplace Violence Policy](#)
- [Workplace Services page on The Landing](#)
- [Global Physical Security + Safety page on The Landing](#)
- [Contact Global Security Operations Center](#)

We are committed to protecting the health and safety of our Personnel and visitors, and you play a critical role in helping us meet this objective. We require all Personnel to comply with health and safety laws and our policies, and to report all work-related injuries or illnesses as well as any hazardous or unsafe conditions. We aim to follow applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.

We do not tolerate violence in the workplace, which may include physical intimidation, direct or implied threats to physically harm others, bullying, stalking, or violent outbursts. Weapons of any kind are prohibited at Okta offices, events, or customer sites when visiting on behalf of Okta. In the event of a potential violent or dangerous situation, you should immediately contact local law enforcement and report it promptly to our Global Security Operations Center.

06

We protect our
innovation





06 We protect our innovation

Confidential information encompasses many types of data – financial, product, Personnel, customer, vendor, and partner – including the following examples:

- *Potential acquisitions or investments*
- *Nonpublic financial data or projections*
- *New product and marketing plans*
- *Contracts, sales and pricing data*
- *Proprietary source code*
- *Personnel records*
- *Internal communications*
- *Lists of existing or potential customers and partners*
- *Personal data (see also “We safeguard data privacy” below)*
- *Usage data*

For more information:

- [Security Library](#)
- [Privacy team page on The Landing](#)

We respect confidentiality

Confidential information generated and gathered in Okta’s business plays a vital role in our operations, prospects, and ability to compete. Many of us need and have access to Okta’s and our business partners’ confidential, proprietary information in order to perform our jobs and contribute to Okta’s and our customers’ success. With access to confidential information also comes the obligation to provide the highest level of protection to that information. You may not disclose or distribute Okta’s, any customer’s, or other business partner’s confidential information, except when disclosure is authorized by Okta or required by applicable law, rule, or regulation or pursuant to an applicable legal proceeding. You may use confidential information solely for legitimate company purposes and must return to the company all of Okta’s and our business partners’ confidential information and proprietary information when you cease to be employed by or otherwise affiliated with Okta. In addition, you should be thoughtful to share confidential information only with other Personnel who have a need to know for a legitimate business reason. When deciding whether to share information, consider:

- Does the intended recipient legitimately need to know this information?
- Is the intended recipient authorized to access, view, use, or otherwise process this information?
- Is this information valuable to the business because it is non-public, sensitive, or legally privileged?
- Can this information negatively impact a customer or Okta or weaken a customer’s security or business standing if known by others?

If there is any doubt about the confidential nature of the information you are considering sharing, ask your manager or the Office of Ethics & Compliance (OEC) (ethics@okta.com) for guidance. Please also see the Security Library for additional information about data classification at Okta. Additional obligations apply to personal data and customer data, see the Privacy team page on The Landing for more information.



Similarly, we respect the obligations our Personnel may have to protect the confidential information of their former employers. This information includes, but is not limited to, information such as business strategies, non-public financial data, customer lists, marketing plans, product designs, or other information that was obtained under a confidentiality agreement. You are prohibited from bringing, disclosing, or using such information in your role at Okta. If you inadvertently obtain confidential information of a third party or are aware of a coworker improperly using information from their prior employer, contact the Office of Ethics & Compliance (OEC) at ethics@okta.com or reach out via one of the other methods listed in Section 3 of this Code. Use of such information could be damaging to Okta, is prohibited by Okta policy, and may be prohibited by applicable law.

We are security conscious

One of our values is Always Secure. Always On. At Okta, cybersecurity vigilance is essential. While we have implemented policies, procedures, and systems designed to mitigate security risks, you are our first line of defense. It's up to everyone to stay alert and follow security policies and best practices at all times. Visit Okta's Security Library for the latest policies and guidance, and report any security concerns to the Security team immediately.

We protect our intellectual property

Our business is driven by innovation, and our intellectual property (e.g., our source code, patents, trademarks, and trade secrets) is a valuable asset that provides us with a competitive advantage. Protecting our intellectual property and other valuable information is critical to our business. If you suspect any misuse or inappropriate disclosure of our intellectual property, you should report this immediately to the Office of Ethics & Compliance (OEC) at ethics@okta.com or via one of the other methods listed in Section 3 of this Code.

We also respect the intellectual property rights of others. Inappropriate use of others' intellectual property (including that of a former employer) is prohibited and may expose Okta and you to criminal and civil liability. Seek advice from OEC at ethics@okta.com before soliciting, accepting or using proprietary information from others, or allowing others to use or access Okta's proprietary information.

For more information:

- [Information Security Policy](#)
- [Security Library](#)
- [Contact Security team](#)

For more information:

- [Source Code Policy](#)



We ensure proper use of Okta's assets

In addition to our intellectual property, our assets also include our information systems, computers, servers, other equipment, and communication facilities. Loss, theft, and misuse of these assets have a direct impact on our business and financial performance. You are expected to protect Okta's assets that are entrusted to you and to protect Okta's assets in general. You are also expected to take steps to ensure that Okta's assets are used only for legitimate business purposes, except for limited personal use of technology resources that does not interfere with your work performance or the work performance of others. You must avoid any unauthorized use, alteration, destruction, disclosure, distribution, theft, waste or other carelessness when handling Okta's assets. Note that Okta reserves the right to monitor and inspect the use of its information and technology resources.

We safeguard data privacy

We make commitments to protect customer data, personal data, confidential information, and the systems that process such data. All Personnel are expected to follow global privacy laws and secure, access, use, and share personal data only in accordance with the law and our policies, and honor individuals' choices with respect to their personal data. Failure to comply with the law and our policies for personal data can result in significant liability for us and loss of trust from our customers. Examples of personal data may include:

- Individually identifying health information;
- Family members' names;
- Employee ID or government ID number;
- Contact information such as email addresses or telephone numbers;
- Credit card or personal financial account information;
- IP addresses/device IDs;
- Customer message detail records;
- Customer email communications;
- Call or video recordings or transcriptions.

For more information, review the training and policies applicable to your situation linked on the Privacy team page on The Landing.

For more information:

- [Information Security Policy](#)
- [Security Library](#)

For more information:

- [Privacy team page on The Landing](#)
- [Contact Privacy team](#)



07

We avoid conflicts of interest

London Office



07 We avoid conflicts of interest

We have an obligation to always do what's best for Okta and avoid engaging in activities that present conflicts, or even the appearance of conflicts, with Okta's interests. We also must never use Okta assets or information to improperly benefit us or our friends and relatives.

Examples of scenarios where conflicts of interest may arise include:

- Engaging in outside employment or consulting activity
- Serving on an advisory board or board of directors of another company
- Using Okta opportunities, information, property, time, resources, relationships, position, or services to benefit another entity, individual, or yourself
- Transacting Okta business with relatives, significant others, or close friends
- Doing work that competes with Okta's business
- Hiring, managing, or supervising any individuals (e.g. friends, relatives) which could have the appearance of impairing objectivity
- Holding a significant or controlling financial interest in one of Okta's competitors, vendors, partners, or customers, or in companies in which Okta has invested
- Accepting gifts, entertainment, or favors related to your role at Okta, either directly or indirectly

You must immediately disclose any transactions, relationships, or activities that may constitute an actual, potential, or perceived conflict of interest via the disclosure and evaluation process described in Okta's Conflicts of Interest Policy. You must follow any guidance provided during the conflicts evaluation process. You are required to submit an updated disclosure if any circumstances change that could impact the evaluation of the potential conflict.

For more information:

- [Conflicts of Interest Policy](#)
- [Gift, Entertainment & Hospitality Policy](#)
- [Conflicts of Interest page on The Landing](#)

08

We maintain financial
integrity and accurate
records



San Francisco Office



08 We maintain financial integrity and accurate records

For more information:

- [Records Management Policy](#)
- [Records Retention Schedule](#)

The integrity, reliability, and accuracy of Okta's books, records, and financial statements are fundamental to our continued business success. You may only enter into authorized business transactions, and you must accurately and truthfully document each business transaction. You may not cause Okta to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, you may not create any false or artificial documentation or book entry for any transaction entered into by Okta. Moreover, you must never falsify any record or account, including time reports, expense accounts, and any other Okta records, and you must never provide inaccurate information in response to corporate processes, such as our quarterly sales certification process. Similarly, Personnel who have responsibility for accounting and financial reporting matters have a responsibility to accurately record all funds, assets, liabilities, and transactions in Okta's books and records.

It is important that we appropriately manage our business records in compliance with applicable laws and Okta policies. For additional information on what to keep and for how long, see Okta's Records Management Policy and Records Retention Schedule. In addition, if the Legal team notifies you that documents in your possession are relevant to an anticipated or pending litigation, investigation, audit, or other legal matter, you must follow the guidelines set forth in the notification and you must not alter or conceal any documents covered by the notification.

09

We respect
human rights
and the
environment





09 We respect human rights and the environment

For more information:

- [Social and Environmental Responsibility at Okta](#)
- [UK Modern Slavery Act Transparency Statement](#)

We believe in the fundamental dignity of every human being and respect the protection of human rights. We strive to respect human rights as defined by the United Nations Universal Declaration on Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and we aim to align with the UN Guiding Principles on Business and Human Rights. We strive to uphold all applicable human rights laws, rules, and regulations, including those pertaining to child labor, modern slavery, and human trafficking, and we expect our vendors, partners and others who provide services on our behalf to adhere to the same strict standards. We condemn all forms of child or forced labor and prohibit unlawful discrimination.

We recognize the right to freedom of association and the legal rights of workers to form or join existing trade unions and to engage in collective bargaining; we neither disadvantage nor prefer members of employee organizations or trade unions. We strive to adhere to all applicable working hours regulations, pay fair wages for labor, and to adhere to all applicable wage and compensation laws.

We have a long-term commitment to climate action and becoming a more sustainable company. We comply with all applicable environmental laws and regulations, promote the sustainable use of resources, and strive to increase our use of renewable energy and reduce our environmental impact.

Please see our [Social and Environmental Responsibility webpage](#), including our [climate](#) and [human rights](#) pages, to learn more about our Environmental, Social and Governance (“ESG”) priorities and key initiatives.



San Francisco Office

10 Violations

11 Administration and waivers



10 Violations

We take all allegations seriously and promptly conduct investigations into reported concerns. Anyone who is found to violate this Code or other Okta policies may be subject to disciplinary action, up to and including termination of employment or affiliation with Okta.

11 Administration and waivers

Our Board of Directors (the “Board”) has established the standards in the Code and, directly or through its Audit Committee, oversees its compliance. The Board has delegated day-to-day responsibility for administering and interpreting the Code to our Chief Legal Officer, who is designated as the Code’s “Compliance Officer.”

It is rare for anyone to be exempted from any part of the Code, regardless of seniority or position. Any waiver of any provision of the Code for a director, executive officer, or senior financial officer must be approved by the Board or the Audit Committee, and promptly disclosed as required by applicable law and stock exchange rules. Waivers of the Code for other employees or contractors must be approved by the Compliance Officer, the Board, or the Audit Committee. For the avoidance of doubt, any pre-approvals under the Code do not constitute a waiver under the Code.

Note that the Code is a statement of certain fundamental principles, policies, and procedures that govern you in the conduct of Okta’s business, and is not intended to and does not create any rights in any Personnel, customer, client, visitor, supplier, competitor, stockholder, or any other person or entity.



okta

12

Other policies
and guidelines

New York City Office



12 Other policies and guidelines

Okta maintains other policies and guidelines that may provide further guidance on matters covered by the Code or address conduct not covered by the Code. Applicable corporate policies and guidelines are noted throughout the Code. You can access these and other policies and guidelines on The Landing or request copies from your manager or your People Business Partner.

For more information:

- [Office of Ethics & Compliance \(OEC\) page on The Landing](#)

You may encounter situations that do not fall within a particular scenario mentioned in the Code or our other policies and guidelines. In these situations, we rely on one another's good judgment, guided by our values, guiding principles, and the letter and spirit of the Code, to do the right thing and uphold a high standard of integrity for Okta and ourselves. If you see something that you think isn't right or you aren't sure of the best course of action, remember that your manager, the People team and the Office of Ethics & Compliance (OEC) are here to help.



New York City Office