

Microsoft  
runs on  
trust.

TRUST CODE

 Microsoft





Our Standards of Business  
Conduct — our 'Trust Code' —  
emphasizes the role that each  
of us plays in building trust.

SATYA NADELLA, CHAIRMAN & CEO

# WHAT IS TRUST CODE?

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Microsoft's Trust Code outlines our Standards of Business Conduct and demonstrates how to apply our culture and values to build and preserve trust with our stakeholders and each other, so we can achieve our mission.

At Microsoft, our Trust Code is not a static document, but a living commitment that evolves with the changing needs and expectations of the company and the communities we serve.

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The Trust Code is a guide to use our culture and values to build and preserve trust with:

- Our Customers
- Governments & Representatives
- Partners & Investors
- Each Other, Our Communities, & The Public



# TRUST CODE COURSE

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The Trust Code (Standards of Business Conduct) course is an annual, mandatory training course for all global, full-time Microsoft employees. It uses live-action, episodic video to depict potential workplace situations covering all 24 Trust Code standards in a programmatic way. Each year, a list of relevant policies and risks are included in the course, aligning them with the Trust Code standards.

It demonstrates how to approach ethical challenges with integrity, which is essential to achieving the company's mission of empowering every person and organization on the planet to achieve more.



# CULTURE & VALUES

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## How do we earn and build trust?

The Trust Code course includes lessons for applying our culture and values to build lasting relationships inside and outside of Microsoft.

Our values are the enduring principles that guide us to do business with integrity as we strive to win trust every day. Our culture is our operating framework — who we are and how we behave.

### Our Culture:

Growth Mindset  
Customer Obsessed  
One Microsoft  
Diverse & Inclusive  
Making a Difference

### Our Values:

Respect  
Integrity  
Accountability



# STORYTELLING

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One of the powerful aspects of the Trust Code course is that it uses relatable scenarios where employees can see themselves reflected in the characters and the fast and difficult decisions they must make as part of their day-to-day work. To do so, the Trust Code course follows four development principles—**simplicity, clarity, relevancy, and engagement**.

Employees are encouraged to “Pause, Think, and Ask,” and to “Speak Up” as part of Microsoft’s culture of trust.

## Working with Subject Matter Experts (SMEs)

Each year, SMEs, policy owners, compliance professionals, and investigators from across the company provide input and guidance on the topics selected for the course to make the scenarios relevant and engaging to employees, while covering the major risks that our company and the industry are facing.

# COURSE PRODUCTION

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Once the script is finalized, the Trust Code course cast is selected, including any Microsoft employees that will participate in it. The course is introduced by Microsoft leaders that speak about the importance of the course learnings, our culture and values, and how Microsoft Runs on Trust.



## Filming

The recordings are hosted as a course application in Microsoft’s learning platform, Viva Learning, where they go through a severe process of testing by subject matter experts and other employees.



## Translation and Accessibility

The final version of the course is translated into multiple languages, so it can be taken by global employees. The course offers multiple accessibility features, such as transcriptions, American Sign Language, and noise suppression.

# CULTIVATE TRUST

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## Trust Code Survey

Key course learnings and further resources are made available for download at the end of the course and ongoing reference.

Employees can provide course feedback via a survey, which helps measure course efficacy and experience, and identify opportunities to continue improving Microsoft's culture. The survey also includes questions regarding Microsoft's culture of trust and employees' willingness to speak up when they see something that's not right.

## Learn More

You can find more information about Trust Code at:

[WWW.MICROSOFT.COM/EN-US/LEGAL/COMPLIANCE/SBC](https://www.microsoft.com/en-us/legal/compliance/sbc)

## Questions?

Contact the Trust Code team with any questions at:

[SBCTCSUPPORT@MICROSOFT.COM](mailto:SBCTCSUPPORT@MICROSOFT.COM)

