



## DOCUSIGN CODE OF CONDUCT

To build trust and confidence in our company, our people, our product, we must demonstrate integrity, reliability, honesty and strength of character at all times.

We must always act in the best interests of DocuSign, our stockholders and our customers. We must respect our fellow employees, foster long-term partnerships with our customers and partners, and act responsibly in our communities.

The DocuSign Code of Conduct (the “Code”) sets forth the fundamental principles and some of the key policies and procedures that govern DocuSign’s business. Our officers, directors and employees – each of us – here at DocuSign should know and comply with all company guidelines, codes and policies.

# OUR RESPONSIBILITIES TO EACH OTHER

## Protecting Confidential Information and Intellectual Property

One of our most valuable assets is our confidential information: information about what we create; information about our business plans and strategies; information about our people and organizations; and information about our corporate finances. To safeguard our position in the market we must not only safeguard this proprietary information, but thoughtfully decide when to release that information.

Each of us must know and follow DocuSign's Information Security and Acceptable Use Policies. We keep documents, e-mails, and other information confidential and only disseminate it outside of DocuSign when required for business reasons. Except for authorized DocuSign spokespersons, employees should not communicate confidential information with the press or in public forums about DocuSign. If you are unsure whether information may be disclosed, ask your manager or seek advice from the Legal Department.

We respect the privacy of our customers, employees, business partners and other relevant individuals, and we protect their personally identifiable information from unauthorized disclosure or abuse.

## Avoiding Conflicts of Interest

We have a duty to our stockholders to always act for the corporate good and not for personal benefit. It means avoiding situations that create, or appear to create, a conflict between personal gain and DocuSign's interest. If such conflicts of interest arise, we must immediately remove ourselves from any decision-making in the matter and let others decide on behalf of DocuSign.

Potential conflicts include, but are not limited to, personnel decisions regarding fellow employees or vendors with whom you may have a personal or romantic relationship and situations where your or your family members have a significant financial stake or employment relationship with organizations seeking to do business or competing with DocuSign. Employment by, significant gifts from, or serving on the board of a customer, partner or other service provider is generally discouraged and you

must seek authorization from the Legal Department by completing an Outside Activity Disclosure Form if you intend to take such a position.

## Promoting Diversity

DocuSign is a global corporation with a talented and passionate workforce comprising people from all walks of life. We are a creative and innovative company and the diverse backgrounds and experiences of our employees are among our greatest corporate strengths. Creativity and innovation flourish in environments of openness and mutual respect. Excluding or limiting a person because of some arbitrary factor would only limit our corporate potential and make us more vulnerable to our competition. At DocuSign, we treat each individual fairly. We do not tolerate discrimination against any individual on the basis of any non-performance-related characteristic. These characteristics include race, religion, gender, age, marital status, national origin, sexual orientation, citizenship status, disability, and other protected characteristics. We do not consider these factors when making decisions regarding recruiting, hiring, compensation, benefits, training, termination, promotions, or any other condition of employment or career development. This policy of non-discrimination is not limited to employees and potential employees, but extends to how we treat our partners, investors, customers, and fellow community members as well.

## Treating Each Other with Respect

Our performance is directly impacted by how we are treated as individuals. We cannot generate the passion or creativity DocuSign needs to compete unless we create an environment that fosters respect and where every employee and partner is treated as a valued contributor.

We treat each individual with respect and strive to create a work environment where all feel welcome to contribute. We do not tolerate any actions, words, or gestures that might be perceived as abusive or harmful to others or that create or foster an offensive or hostile work environment, including, but not limited to, offensive conduct, derogatory jokes or comments, or unwanted sexual advances. This standard applies to our relations with customers, partners, coworkers, and fellow community members around the world.





# OUR RESPONSIBILITY TO OUR CUSTOMERS AND PARTNERS

## Fostering Partnerships

DocuSign's success is dependent on our developing long-term partnerships with the customers and companies with whom we do business. We enter into partnerships committed to promoting our partners' interests as well as our own. We never sacrifice a long-term relationship for a short term gain and we never take undue advantage of a business relationship.

## Respecting the Intellectual Property of Others

As a technology company, we recognize that our lifeblood is intellectual property: patents, copyrights, trade secrets, and trademarks. If we want others to respect our intellectual property, we must do the same in return. We respect the intellectual property of others.

When we use patents and copyrighted material belonging to others, we obtain the proper licenses and permissions. When we cite the trademarks of others, we use them in accordance with any applicable license or permission provided by the owners. We do not use DocuSign networks, computers, or other resources to acquire, share, or store copyrighted material that is not properly licensed.

## Maintaining Nondisclosure

Just as we keep our own proprietary information confidential, we must also treat as confidential the proprietary information of those we do business with. We maintain the proprietary information of our business partners with the same protection we devote to our own. We do not publicly disclose such information without the express permission of the owner.

## Giving and Accepting Gifts

Maintenance of long-term relationships requires that we act in a way that does not create conflicts of interest or ethical concerns for our partners.

We at DocuSign never place a partner, customer, or government official in an ethically challenging position. With that in mind, we do not offer gifts to government officials.

Gifts, entertainment, and hospitality are permitted for non-government partners or customers only if they:

- have a business purpose

- are reasonable in value and appropriate to the business relationship and local custom
- are not intended to improperly influence acts or decisions
- are legal in both your country and the country of the recipient
- do not violate the standards of conduct of the recipient's organization or any contractual agreement with a customer
- are properly documented and
- where necessary, proper approval is obtained prior to giving any gift, entertainment, or hospitality. If you have a question about whether a gift or entertainment is permissible, seek advice from DocuSign's Legal Team or you can email [complianceofficer@docusign.com](mailto:complianceofficer@docusign.com).

# OUR RESPONSIBILITY TO THE COMMUNITY

## Securing Competitive Information

Free and open markets serve all in the community and only serve to make us and our products better over the long run. At DocuSign, we do not engage in activities that would limit competition in the marketplace or which might violate antitrust laws. We gather competitive information with care, seeking only information that is publicly available. We conduct all our internal discussions, deliberations, and activities as if they were completely in the public view.

## Corruption and Bribery

We strictly forbid offering or giving to any person, or soliciting or accepting from any person, bribes, preferential benefits and kickbacks by our employees, directors, contractors, and business partners. We abide by anti-corruption laws everywhere we do business in the world, without exception. These laws include the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010, which apply everywhere we do business globally, as well as all applicable anti-corruption laws in each country where we do business. Broadly speaking, anti-corruption laws prohibit offering or giving, or requesting or accepting, anything of value (including cash, gifts, entertainment, travel expenses, and anything else that has a value to the recipient) to or from a government official or any person in order to influence anyone in the performance of their job to retain or obtain business or any improper business advantage. Each of us, regardless of the country in which





we work, must adhere to these requirements, even where corrupt practices are expected or customary.

## Improving our Communities

Our success is due in large part to the benefits, both tangible and intangible, we derive from membership in larger communities, local, national, and global. We seek to return these benefits, both as a corporate entity and by encouraging employees to take an active part in their communities. We are committed to benefiting the communities in which we live and work. As a corporation we work with and contribute to charitable and community organizations. We encourage employees to become individually engaged in community organizations, charities, and political activities as their conscience and desires dictate.

## Conserving the Environment

We are dedicated to conducting all our activities in an environmentally responsible way that minimizes environmental impacts. We actively promote the use of environmentally friendly products and services, recycling and reuse of resources. We maintain a safe and healthy work environment and our activities are undertaken in full compliance with applicable environmental legislation and regulations.

## Engaging in Political Activities

We encourage employees to participate in the political process, however, we do not use DocuSign funds or assets on behalf of a political party or candidate except as expressly approved by DocuSign. Employees may involve themselves in political issues and campaigns as their consciences and beliefs dictate, but such involvement must be on an individual basis without using DocuSign resources and on their own time.

## REPORTING VIOLATIONS

It is impossible to spell out every possible ethical scenario we might face, so we rely on one another's good judgment to uphold and apply this Code. We expect all of us at DocuSign to be guided by both the letter and the spirit of this Code. Often this will mean making judgment calls about situations. When it comes to ethical conduct, we believe in erring on the side of caution. Such judgments may not always be an easy call, so if you are not sure of what to do, ask your supervisor or our Chief Compliance Officer at [complianceofficer@docusign.com](mailto:complianceofficer@docusign.com).

We have also established an anonymous reporting tool in accordance with local law. Employees may make anonymous reports by: (i) leaving an anonymous message via toll-free telephone at 855-857-6207; (ii) submitting an anonymous report online at [www.docusign.ethicspoint.com](http://www.docusign.ethicspoint.com); (iii) sending a message from an anonymous email address to [complianceofficer@docusign.com](mailto:complianceofficer@docusign.com); or (iv) delivering the complaint anonymously via regular mail to the Chief Compliance Officer at DocuSign, Inc., 221 Main Street, Suite 1000, San Francisco, California, 94105, USA.

More information and details about specific DocuSign policies are available on [myDocuSign](#). If you have questions about specifics, this should be the first place you turn. If you know of a situation or incident that you feel may violate this Code, it is your responsibility to bring it to the attention of your supervisor or the Chief Compliance Officer.

The issue will be reviewed and appropriate action taken to correct the situation and ensure further violations do not occur. Failure of any employee to live up to the Code, will result in disciplinary action, up to and including termination of employment. Do not be afraid to speak out. We will not retaliate or allow retaliation for reports made in good faith.

## Complying with Applicable Laws

We obey and comply with all laws and regulations that apply to us in the communities in which DocuSign does business. But this legal compliance is simply the baseline, establishing the minimum that we must do. We always comport ourselves in accordance with the highest ethical standards, and the principles of this Code, whether or not there is a legal requirement to do so. In addition to adhering to local regulations, we always comply with the US Foreign Corrupt Practices Act and US export control regulations regardless of the country in which we are operating.

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