



U.S. Public Sector Addendum to the Code of Business Conduct and Ethics

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DocuSign, Inc. ("DocuSign" or the "Company") is a contractor to United States federal, state, and local government entities and their representatives, and to other contractors and subcontractors that sell to government entities in the U.S. DocuSign is committed to conducting business with the government ethically and in accordance with the complex regulatory and compliance obligations imposed on the Company, many of which reach beyond DocuSign's commercial practices. As part of this commitment, the Company has adopted this United States Government Addendum (the "Addendum"), which expands upon the DocuSign [Code of Business Conduct and Ethics](#) (the "Code").

APPLICABILITY & SCOPE

This Addendum applies to all DocuSign employees who:

- Sell to or interact with U.S. federal, state, or local government entities or their representatives; or
- Support DocuSign's contracts and/or subcontracts with U.S. federal, state, or local government entities.

All such employees must read, understand and abide by the Code, this Addendum, all relevant Company policies, and all applicable laws and regulations. If you are uncertain as to whether this Addendum and the referenced policies and regulations apply to you, or a particular contract or relationship, contact the Legal Department or the Chief Compliance Officer (complianceofficer@docusign.com), or use the reporting procedures in our [Whistleblower and Complaint Policy](#).

GOVERNMENT CONTRACT COMPLIANCE

DocuSign is committed to complying with all terms, conditions, and regulations that apply to its government contracts and subcontracts. Violations of those terms, conditions or regulations can have serious consequences that include contract termination, financial penalties, and DocuSign's suspension or debarment from receiving future contracts. If you are performing work on a U.S. government contract and are uncertain about which contractual or legal obligations apply in a given situation, you should notify your supervisor, contact the Legal Department or the Chief Compliance Officer (complianceofficer@docusign.com), or use the reporting procedures in our [Whistleblower and Complaint Policy](#).

DEALINGS WITH U.S. GOVERNMENT OFFICIALS, EMPLOYEES AND CONTRACTORS

Gifts, Meals, Entertainment, and Hospitality

You must comply with the DocuSign [Global Anti-Corruption Compliance Policy](#), which:

- Prohibits bribery; and
- Requires Legal review/approval before offering gifts, meals, entertainment, hospitality and travel to a representative of, or anyone with any affiliation to, a U.S. federal, state, or local government entity.

Note: For purposes of the [Global Anti-Corruption Policy](#) and this addendum, “**anything of value**” includes both tangible and intangible gifts, such as: meals, drinks, event tickets, conference fees, travel expenses, charitable contributions, offers of employment, favors or special discounts. Gifts, meals, and entertainment may not be provided to family members of, or other guests of, Government Officials.

Modest refreshments such as soft drinks, coffee, and donuts at hosted meetings are usually permissible, if they are offered infrequently and connected to a legitimate business activity. However, if lunch or other meals are served, Government Officials may be required by their ethics codes to pay the fair value of their meals.

Prohibition on Kickbacks

In connection with our government business, DocuSign interacts often with resellers, systems integrators and other partners that sell to U.S. federal, state, or local government entities. Those engagements must also be free of corruption or any other form of improper conduct. Such conduct includes offering or accepting kickbacks, which are the improper offer of money or anything of value to illegally retain or steer business in connection with a federal contract or subcontract. DocuSign strictly prohibits employees from offering or accepting gifts that are designed to influence a Company decision or to obtain an unfair business advantage.

Dealings With Suspended and/or Debarred Entities or Individuals

When contracting with U.S. government entities, DocuSign is required to screen any business entity or individual that may be employed in connection with those contracts to verify that they have not been excluded from federal procurement and non-procurement programs. The General Services Administration maintains a roster of excluded individuals and entities through the System for Award Management, at www.SAM.gov. Any plan to contract, subcontract, or otherwise employ an individual or business entity on the list must be approved by the Legal Department or the Chief Compliance Officer (complianceofficer@docuSign.com).

Hiring Former U.S. Government Employees

Current or former government personnel are subject to ethics rules that can impact whether DocuSign can hire them and the type of roles they can perform. These rules are complex, vary by jurisdiction, and may be impacted by job titles and responsibilities, contract values, and other factors. Contact the Legal Department for guidance before discussing employment with anyone

FAQ: Who is a “U.S. Government Official”?

Anyone with any affiliation to a U.S. federal, state, or local government department, agency, or instrumentality, at any level, should be treated as a “government official” for purposes of this Addendum including:

- Government employees (at any level, whether federal, state, or local)
- Directors, officers and employees (regardless of position or level) of entities owned or controlled by, or affiliated with, government (e.g., state owned enterprises)
- Professors at public universities and doctors at public hospitals
- Members of public international organizations
- Members of the military
- Candidates for political office
- Political party officials

who is or was employed by a government entity in the U.S. Discussions of employment with U.S. government procurement officials carry increased risk and are prohibited without prior authorization by the Legal Department or the Chief Compliance Officer (complianceofficer@docuSign.com). If a government official or employee inquires with you about employment at DocuSign, you may direct them to DocuSign's online job postings. Do not refer government personnel involved in DocuSign matters to job openings at DocuSign, whether via a recruiting platform or other means. For conflict of interest and anti-corruption reasons, employee referral bonuses as described in DocuSign's Employee Referral Program will not be paid for referrals of government personnel.

TRUTH AND ACCURACY IN OUR DEALINGS WITH GOVERNMENT ENTITIES

Federal False Claims Act and state law equivalents

Federal law requires contractors to be accurate when providing information to the U.S. government. Many states have similar laws. This requirement applies to marketing materials, representations, certifications, warranties, invoices, requests for payment, statements of compliance with specifications, product documentation, and any other communication, whether written, oral, or electronic. It may be a civil or criminal offense, as well as a violation of the Code and this Addendum, to make a communication to a U.S. government entity with knowledge that the communication is false or inaccurate or made with a reckless disregard for accuracy.

Contract Fulfillment and Performance

DocuSign must provide its government customers with the products and/or services set forth on the applicable order form, statement of work, or other contractual documentation, unless DocuSign has received express written consent from an authorized individual of the U.S. government customer or U.S. government contractor customer. Knowing failure to do so is a violation of this Addendum and can trigger the False Claims Act.

Accurate Invoicing

All DocuSign invoices must accurately reflect the product or service, quantity, and price for the products delivered or the services performed. It is a violation of this Addendum to deliver any product or service that does not comply with contract requirements, or submit an inaccurate or incomplete request for payment, to a U.S. government customer.

FAIR DEALING

Procurement Information (Procurement Integrity Act and state law equivalents)

The regulations governing U.S. federal government procurement and interactions with government officials and employees during procurements are complex and strictly enforced. Prohibited conduct under the Procurement Integrity Act, as well as many state law equivalents, includes soliciting, obtaining, or otherwise disclosing government source selection information, or a competing contractor's proprietary bid or proposal information.

- "Bid or proposal information" includes cost or pricing information, cost build-up information and information marked as "bid or proposal information" in accordance with applicable regulations.

- “Source selection information” includes competitors’ proposed cost or prices, source selection and technical evaluation plans, government evaluations of proposals, rankings of bids or proposals, reports and evaluations of source selection panels, boards or advisory councils, and any other information marked as “source selection information” in accordance with applicable regulations.

In addition to the above, you must not request or obtain any other sensitive, proprietary, or otherwise improper information regarding a competitor of the Company or regarding a U.S. government procurement. You must comply strictly with the terms of any nondisclosure or other agreement under which the Company receives any confidential or proprietary information from government entities or any third parties.

If you believe you have improperly received “bid or proposal information,” “source selection information,” or other confidential or proprietary information, you shall: (1) refrain from using or disclosing the information in any manner for any purpose, including to anyone else within the Company; and (2) contact the Chief Compliance Officer (complianceofficer@docusign.com) and/or the Legal Department immediately.

Other Competitive Practices

You may meet and talk with DocuSign competitors, however, such discussions shall not include confidential cost or pricing information, including DocuSign’s proposed pricing, or suggestions or agreements regarding the submission, or non-submission, of offers on future U.S. government procurements.

AVOIDING CONFLICTS OF INTEREST

Organizational Conflicts of Interest

An Organizational Conflict of Interest (“OCI”) is a situation where either: (1) the Company receives an unfair competitive advantage on one contract through work it has done for the government, either formally or informally on another contract; or (2) the Company’s objectivity in working for or otherwise advising the government is impaired. While the types of products and services DocuSign sells are not as likely to create an OCI as other kinds, it is important for the Company to comply with applicable prohibitions and other requirements relating to OCIs.

If you are asked for representations or certifications relating to OCIs or an OCI mitigation plan, contact the Legal Department or the Chief Compliance Officer (complianceofficer@docusign.com) for guidance before proceeding.

Personal Conflicts of Interest

The Code requires you to avoid personal conflicts of interest. A personal conflict of interest may arise if you have a financial interest, personal activity, or other relationship that would impair your ability to act impartially and in the best interest of a U.S. government customer or DocuSign. If you think you might have a personal conflict of interest, notify the Legal Department or the Chief

Compliance Officer (complianceofficer@docusign.com) as soon as possible, and remove yourself from any decision-making authority at issue.

SAFEGUARDING INFORMATION

Confidential, Proprietary and Sensitive Information

You are responsible for safeguarding the Company's confidential and proprietary information, as well as information belonging to U.S. government entities, their representatives, or U.S. government contractors or subcontractors. In addition to the obligations set forth in the Code on protecting confidential information and intellectual property, obligations under U.S. government contracts may include heightened safeguarding requirements and may also prohibit the transmission of information outside the U.S., either physically or electronically. You are responsible for safeguarding information in accordance with the Company's [Information Security](#) and [Acceptable Use Policy](#) and with requirements specified in applicable government contracts. Any questions about the treatment of confidential, propriety, or sensitive information should be directed to the Legal Department or the Chief Compliance Officer (complianceofficer@docusign.com).

Classified Information

You must not discuss, accept or retain classified information without the advance approval of the Legal Department or the Chief Compliance Officer (complianceofficer@docusign.com).

RECORD KEEPING

The Code, this Addendum and DocuSign's [Global Anti-Corruption Compliance Policy](#) require that all Company books and records be full, fair and accurate. For all U.S. government contracts, DocuSign shall retain all contract documents generated from proposal entry to contract closeout, for the duration of contract performance and not less than three (3) years thereafter. When performing professional services or similar engagements, you must record time worked and activities performed accurately, completely, and in a timely manner.

LOBBYING ACTIVITIES

Federal law generally prohibits U.S. federal government contractors from using "appropriated funds," including the proceeds of any U.S. federal government contract, to pay any person for influencing an officer or employee of any agency, a member of Congress, or an employee of a member of Congress in connection with certain official actions, including the award or modification of a U.S. federal government contract. Many U.S. state and local jurisdictions have similar laws.

DocuSign may be required to report certain communications intended to influence U.S. government individuals or actions, and you may be required to register as "lobbyists" if you engage in such activities. If you are considering pursuing this type of communication or activity, or if you have questions about which activities and communications these laws cover, contact the Legal Department or the Chief Compliance Officer (complianceofficer@docusign.com).

COMBATING HUMAN TRAFFICKING

The U.S. federal government has adopted a zero-tolerance policy regarding trafficking in persons. Federal law requires U.S. federal government contractors to take measures to protect persons from exploitation and to eliminate human trafficking, including sex trafficking, forced labor, and other forms of involuntary servitude. DocuSign has also adopted and maintains a [Modern Slavery and Human Trafficking Statement](#), which reflects DocuSign's commitment to operating ethically and ensuring that there is no slavery or human trafficking in DocuSign's business or supply chains.

DocuSign, its employees, subcontractors, vendors, and/or suppliers, are prohibited from engaging in trafficking in persons, procuring commercial sex acts (defined as any sex act for which anything of value is given or received by any person), or using forced labor. This policy applies both to actions performed while on a job, as well as after-hours activities.

Violations of this policy will result in action against you that may include, but may not be limited to, reduction in benefits, termination of employment, or reassignment. Questions, concerns about, or knowledge of any violations of this policy should be reported immediately to the Chief Compliance Officer (complianceofficer@docusign.com), or through the DocuSign ethics hotline using the reporting procedures in our [Whistleblower and Complaint Policy](#).

PROHIBITION ON TEXT MESSAGING WHILE DRIVING

You shall not read or send text messages while: (1) driving Company-owned, Company-rented, or U.S. federal government-owned vehicles, (2) driving a privately-owned vehicle on Company business, or (3) driving and performing any work for or on behalf of the U.S. federal government.

MANDATORY DISCLOSURE RULE

The Federal Acquisition Regulation includes a Mandatory Disclosure Rule that requires DocuSign to notify the U.S. federal government in writing if there is "credible evidence" of certain crimes, a violation of the False Claims Act, or significant overpayment by the government. DocuSign also may be liable for the related actions of a subcontractor under a U.S. federal government contract. Potential wrongdoings that are prohibited under this Addendum and must be reported include:

- Activities involving criminal fraud;
- Activities involving conflicts of interest;
- Activities involving gratuities rules;
- Activities involving bribery;
- False statements or certifications made or false claims submitted to the U.S. federal government, or to U.S. federal government prime contractors;
- Significant overpayments received from the U.S. federal government.

If you have questions about the Mandatory Disclosure Rule or DocuSign's Mandatory Disclosure obligations, or become aware of anything that may trigger a mandatory disclosure obligation, you

should alert the Legal Department or the Chief Compliance Officer (complianceofficer@docusign.com), or utilize the reporting tools described in our [Whistleblower and Complaint Policy](#), immediately.

ENFORCEMENT AND REPORTING

When to Report Violations of this Addendum

Sometimes the most difficult issue you face in complying with a is making a decision whether or not to report. When you face a situation that is not specifically covered in this Addendum, ask yourself:

- Is it against the law, this Addendum, or the Code?
- Does it conflict with DocuSign's contractual requirements with U.S. government customers?
- How will this situation look if revealed to my management, peers or family, or if reported in the media?
- Is it the right thing to do?
- If this were your own business or company, would you still do this?

How to Report Violations of this Addendum

If you become aware of a suspected or actual violation of this Addendum by others, you have a responsibility to report it in accordance with the procedures outlined below. You and the Company will be best served by bringing the concern into the open so that any problems can be resolved quickly and more serious harm prevented. To report suspected or actual violations:

- Raise the issue with your supervisor.
- Notify the Compliance Officer (complianceofficer@docusign.com).
- Use the reporting procedures in our [Whistleblower Policy and Complaint Policy](#).

DocuSign has established these procedures so that properly trained individuals will learn of and can then investigate any alleged violation of this Policy. You may not conduct your own investigation either before or after making a report and you are obligated to cooperate with investigations or audits conducted by the Company or U.S. government.

Enforcement and Penalties

Employees who violate this Addendum (including by retaliating against another employee who in good faith reports a suspected violation of this Addendum) are subject to disciplinary action up to and including termination of employment for cause. Violating this Addendum may also mean breaking the law, subjecting you and/or the Company to criminal penalties (fines or prison sentences) or civil sanctions (damage awards or fines).