

DocuSign®

Code of Conduct

Acting with Integrity

Adopted November 28, 2023



We act with Integrity

- We uphold our Code and Values
- We make ethical decisions
- We know our responsibilities
- We speak up
- We have resources to help you

We protect DocuSign

- We protect assets and information
- We comply with Trade Laws
- We comply with Insider Trading laws
- We keep accurate records
- We avoid conflicts of interest
- We take care when communicating

We're ethical wherever we do business

- We don't tolerate corruption
- We're responsible with gifts
- We engage responsibly with governments
- We conduct business fairly

We promote an ethical workplace

- We foster an ethical workplace
- We celebrate diversity
- We give back

We uphold our Code and Values.

This Code of Conduct sets out DocuSign's expectations for how we do business. In short, we expect employees, Board members, and the partners and other third parties we do business with, to act with integrity. This means applying our values, complying with the laws and regulations that apply to DocuSign – wherever we do business – and meeting the highest standards of ethics while doing so. Acting with integrity is how we earn and keep the trust of our customers, our partners and each other.

The code can help you:

- Understand DocuSign's expectations of you
- Make ethical decisions
- Apply DocuSign's values
- Protect DocuSign's reputation
- Comply with applicable laws and regulations
- Know who to contact if you have questions or concerns

The Code is an important resource that you're required to know and follow, but it can't cover every situation you may encounter. You must use good judgment in all dealings and, if you have concerns or are unsure what to do, speak up and ask for help.

If you violate the Code, you may face disciplinary action, up to and including termination.

 **Trust** **Customer Focus** **Simplicity** **Innovation** **Unity** **Sustainability**

We make ethical decisions.

When faced with a decision, ask yourself...

Does it comply with our policies and the law?

- Code of Conduct
- Policies, standards and guidelines in Policy Bank
- Applicable laws, regulations, and rules

Does it align with our values?

- Trust
- Customer Focus
- Simplicity
- Innovation
- Unity
- Sustainability

Does it feel right?

- How would it reflect on DocuSign if it was in the news? On you?
- Do you have the knowledge and authority to make the call?

'Unsure' to any

Get advice before proceeding. Talk to your manager or contact the Legal Department.

'Yes' to all

It's probably ok to proceed.

'No' to any

Stop. Do not proceed.

What if... I suspect someone is violating our Code. Do I need to have proof to raise a concern?

No. As long as you are reporting in "good faith" – meaning that you are doing so with information that you believe to be true, even if it turns out to be false – you should raise the concern. It's better to speak up than risk harm to DocuSign or others.

We know our responsibilities.

We expect you, as a DocuSign employee, to:

Act with Integrity. Think before you act. Always strive to do the right thing.

- **Know and follow the Code.** Read, understand, and follow it and any other DocuSign policies that apply to your role.
- **Follow laws and rules.** Take required training on time. Know and follow the laws, rules and regulations that apply to your role and our business.
- **Ask for help.** If you're ever unsure of how to proceed, ask for guidance before taking action. See this list of [resources](#) for help with questions and for reporting concerns.
- **Speak Up.** If you suspect a violation of this Code or the law, report it. Reports made in good faith help us identify and address important issues.

Managers have additional responsibilities. If you are a manager, you must also:

- **Be a good role model.** Reinforce the importance of our Code and act with integrity, such as by being the first to take required trainings.
- **Create a culture of integrity.** Know and talk about the Code and our Core Values. Let employees know that you expect them to do the right thing – even when it's hard. Invite them to hold you accountable as well.
- **Speak up and encourage employees to speak up.** Report concerns and encourage employees to come to you with questions or concerns. Make sure they're aware of reporting resources.
- **Respond appropriately when an employee raises a concern to you.** This can include thanking them, reminding them of our no-retaliation policy, and helping them understand next steps.



We speak up.

If you have questions or concerns about the Code or any other ethics issue, we want to hear from you. DocuSign has resources available to address questions and concerns in a timely and meaningful way:

Your manager or a manager you trust

May be the most familiar with the policies and guidelines that apply to your business activities.

Employee Relations

Can discuss and address concerns or complaints about employment or workplace issues.

→ employee.relations@docusign.com

Legal Department

Can explain and interpret the law, Code and other policies, and help you navigate ethics concerns.

Senior Leadership

Are available to answer questions and are familiar with applicable policies and guidelines.

Human Resources

Can answer questions about employment, benefits, and workplace issues.

→ hr@docusign.com

Integrity Helpline

An easy and secure way to report ethics concerns that is available 24 hours a day, seven days a week, including anonymous reporting where permitted.

→ www.docusign.ethicspoint.com

→ 1-855-857-6207

We cooperate with investigations

We cooperate fully with internal and government investigations and other government oversight related to our business. If you are contacted by a representative of the government or a third-party investigator, contact the Legal Department immediately.

No Retaliation

DocuSign prohibits retaliation of any kind against anyone who, in good faith, raises a question, reports a concern, or assists in an investigation.

What can retaliation look like?

- Termination of employment
- Negative performance ratings
- Demotion or withheld promotion
- Reduced compensation
- Reassignment of role or duties
- Exclusion from meetings
- Threats or harassment

Suspected retaliatory acts should be reported to your manager or any of the listed resources immediately.

We have resources to help you.

If you have a question or concern, start with your manager or a manager your trust, or reach out any of the following resources.

Question or Concern	Team	Contact
Violations of the Code, other policies, or the law (including anonymously where the jurisdiction permits it)	Your Manager, Employee Relations, Legal, Ethics Hotline	Ethicspoint: 1-855-857-6207 or www.docusign.ethicspoint.com
Questions about the Code of Conduct	Your manager, the Legal Department	complianceofficer@docusign.com
Questions about laws and regulations	Legal Department	Legal Front Door
Concerns or complaints about employment or workplace issues	Employee Relations	employee.relations@docusign.com
Questions about accounting and finance	Finance Department	Finance & Accounting Hub page
Questions about sales compensation	Worldwide Field Operations	Global Sales Compensation Hub page
Questions about the Insider Trading Policy, including trading windows	Legal Department	trading@docusign.com
Concerns about workplace health and safety	Security Operations	security@docusign.com
Concerns about cybersecurity	Trust & Security	Security Hub page
Questions about press or media inquiries	Corporate Communications	media@docusign.com

We protect assets and information.

We have a duty to protect DocuSign's assets, whether they are physical, like a computer, electronic, like software, or information, like intellectual property. You must protect such assets from damage, loss, misuse and theft, and never use them beyond permitted uses, for personal gain, or for unauthorized, illegal or unethical activities.

We protect Information

One of our most valuable assets is the information that we use and create, including:

- Intellectual property (such as trademarks, copyrights, patents, trade secrets).
- Information about what we create and how we create it (such as source code, product designs, product roadmap, and other sensitive materials)
- Information about business plans and strategies.
- Information about people and organizations.
- Information about business processes.
- Information about corporate finances.
- Other non-public information.

Read our [Data Classification Standard](#) and [Data Handling Standard](#) to learn how DocuSign classifies information. We only disclose confidential information outside of DocuSign for valid business reasons. You must safeguard not only DocuSign's information, but also the information of our customers, partners, and other third parties who have entrusted their information to us – now, and even after you leave DocuSign.

We protect Privacy

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

If you are unsure whether information may be accessed, used or disclosed, ask your manager or seek advice from the Legal Department's Privacy team.

What if.... My new colleague just shared a customer list from a previous employer. Can I use the list?

No. Information about a company's customers is almost always confidential. Using it would violate our policies and our value of Trust, may breach contractual obligations, may be against the law, and may violate the privacy rights of the customers. If you're comfortable doing so, you should point the new colleague to our policies. You should also notify your manager, who can follow up appropriately.

Learn More

- [Employee Handbook](#)
- [Information Security Policy](#)
- [Asset Management Standard](#)
- [Acceptable Use Standard](#)
- [Privacy Notice](#)



We comply with Trade Laws.

DocuSign doesn't ship many physical products, but our products and services are still subject to import and export laws and regulations (also known as Trade Controls), including:

- Export controls, which restrict travel to designated countries or prohibit or restrict the shipment of goods, services and technology to designated countries, identified persons or entities.
- Anti-boycott compliance, which prohibits U.S. companies from actions that would further any unsanctioned boycott of a country friendly to the U.S.
- Economic sanctions that require us to refrain from doing business with certain entities, countries, or individuals from those countries.

Each of us, regardless of the country in which we work, must adhere to the requirements detailed in the [Trade Control Compliance Policy](#).

What if... One of our customers has employees in a sanctioned country and wants to use DocuSign services there. What should you do?

Contact exportmanager@docusign.com for guidance on whether the proposed use is acceptable or might qualify for an exception.

We comply with Insider Trading Laws.

Using inside information to buy or sell securities, or tipping others to do so, is unfair, illegal and a violation of our [Insider Trading Policy](#).

If you're considering trading our stock or other securities, you must:

- Never buy or sell our securities based on material nonpublic information,
- Keep all material nonpublic information confidential, including from your family and friends and,
- Comply with our [Insider Trading Policy](#), including open trading windows and trading blackout periods for DocuSign stock.

What is inside information?

As a DocuSign employee, you may have access to material, non-public information about DocuSign, our partners or our customers. "Material" means that an average person would find the information important in making an investment decision. "Nonpublic" means that it's confidential information that hasn't been shared with the public.

Contact trading@docuSign.com before trading if you're unsure whether you have material nonpublic information.

What does inside information look like?

Financial results | Planned products or product functionality | Acquisitions of other companies | The gain or loss of a significant customer | Major partnership agreements | Pending regulatory action | Significant litigation



Can I tell my friend about a planned integration with a partner that I think will affect our stock price? The news hasn't been made public yet.

No. Federal securities laws and our [Insider Trading Policy](#) not only prohibit the purchase or sale of securities using material, nonpublic information, but also prohibit tipping others – by providing such information so that they can buy or sell.

We keep accurate records.

DocuSign relies on the accuracy of our records to make the right business decisions and meet our legal, financial, audit and other obligations. Our shareholders also rely on us to provide complete, timely, and accurate information. We are all responsible for:

- Making sure our books and records are accurate, complete and understandable.
- Making sure transactions are supported by appropriate documentation.
- Following expensing, contracting, and purchasing requirements
- Complying with our internal controls.
- Complying with Generally Accepted Accounting Principles, Securities and Exchange Commission reporting rules, and any other financial reporting requirements that apply to DocuSign.
- Refraining from entering into false transactions, “side letters”, or from hiding the true nature of any transaction.
- Cooperating with management, audits and investigations
- Preserving and disposing of records appropriately and in compliance with legal or other hold requests.
- Reporting any concerns to complianceofficer@docusign.com

What is a “Side Agreement” or “Side Letter”?

Any agreement that is not part of the formal, written contract between DocuSign and a counterparty. DocuSign prohibits such “off the record” agreements, as they can create the potential for fraud and inaccurate financial reporting. More information on Side Agreements can be found in the [Revenue Operations Policies & Company Booking Policy](#).

We avoid conflicts of interest.

We have a duty to act in the best interest of DocuSign. That means we avoid situations that could create, or appear to create, a conflict between your personal interests and those of the company. We also avoid situations that can lead to a close friend or relative receiving an improper personal benefit from your position with DocuSign. If you think that a personal activity, investment, interest, or association could compromise — or appear to compromise — your ability to make impartial business decisions, you must disclose it immediately to your manager and submit an [Outside Activity Disclosure form](#).

Referrals by Board members

Because of their fiduciary duties and high profile, members of DocuSign's Board of Directors must avoid conflicts of interest, or their appearance, when introducing potential third parties with whom the director has a relationship.

What if... I have an idea for an app. It's not related to DocuSign's products and I plan to work on it on weekends. Do I need approval?

Yes. You should inform your manager and submit an [Outside Activity Disclosure form](#). The legal team will review and provide guidance on whether the activity would create a conflict of interest.

Examples of potential Conflicts of Interest include:

- Consulting for a customer, supplier, service provider, or competitor.
- Taking personal advantage of DocuSign business opportunities.
- Participating on the board or committee of another company.
- Hiring or supervising family members or others with whom you have a close, personal relationship.
- Personal relationships with a subordinate, supervisor, or manager.
- Accepting gifts from, or giving gifts to, a subordinate, supervisor, or manager that could appear to be improper.
- Accepting high value or excessive gifts, entertainment, or other business courtesies from third parties, whether directly or through an intermediary like a family member or friend.
- Accepting a loan or loan guarantee from a partner or supplier.
- Other employment or financial interests, like significant investments in competitors or businesses that seek to do business with us.

What if... My colleague is in a romantic relationship with the employee of a partner that he manages. What should I do?

Contact complianceofficer@docusign.com or submit a concern via our Integrity Helpline at www.docusign.ethicspoint.com or (855) 857-6207.



We take care when communicating.

DocuSign strives to be open and transparent about our business. We believe that doing so results in better outcomes for our employees, customers, shareholders, stakeholders, and for DocuSign. But not all information should be shared outside the company, and some laws, such as Regulation Fair Disclosure (FD) restrict when and how we share certain information.

Only authorized individuals may speak on behalf of DocuSign. This is important to avoid:

- Saying something that doesn't align with our Code or our values,
- Misstating DocuSign's position on certain topics,
- Inadvertently disclosing confidential information,
- Making a statement that violates the law,
- Making promises that we can't keep.

Any disclosure of material nonpublic information could cause DocuSign to violate securities laws or regulations, and could subject the company and employees involved to legal liability. Please see our [Corporate Disclosure \(Regulation FD\) Policy](#) for more information on the disclosure of financial and other material corporate information, and our [External Communications Policy](#) for more general guidance on press, public events, social media and other communications matters.

If you receive an inquiry from an investor or a member of the media, government, or public, or a request to speak at or participate in a conference or other event, refer them to Corporate Communications team (media@docusign.com) and/or the Investor Relations team (investors@docusign.com) if the topic is investor-related.

Learn More

- [External Communications Policy](#)
- [Corporate Disclosure \(Regulation FD\) Policy](#)

We don't tolerate corruption.

We compete on the quality of our products, are ethical in our sales practices, and abide by anti-corruption laws everywhere we do business in the world, without exception. These laws, which include the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, and others, generally prohibit offering, giving, requesting or accepting, anything of value to or from a [government official](#) or any person to improperly retain or obtain business. Our [Global Gift and Anti-Corruption Policy](#) sets out DocuSign's practices for preventing corruption and bribery and for properly offering, giving and accepting gifts. And our [Global Supplier Code of Conduct](#) sets out our expectations for our suppliers, including that they share our commitment to conducting business with integrity and transparency, will comply with all applicable anti-corruption laws, and will reject and strictly prohibit all forms of corruption and bribery.

What does corruption look like?

Corrupt actions don't have to include the offer or transfer of money. Offering any thing of value, whether tangible or not, could be considered corrupt. Examples include:

- Gifts, meals, travel or entertainment – especially of a lavish nature.
- Overbilling or steering business to a specific vendor.
- Offers of employment to you or someone close to you.
- Facilitation payments (sometimes referred to as “speed payments” or “grease payments”) to speed up routine government processes.
- Donations to charity to political organizations.
- Requests for one of the above.

Any of these could be considered corrupt if offered in exchange for a favorable decision or favorable treatment.

Stop and Speak Up

Comments like these should make you pause. If it sounds illegal or unethical, it probably is.

“Let's keep it between us.”

“That's just how we do things in this country.”

“I can meet your deadline if you pay me a small fee.”

“A political contribution might help speed things up”

Approval Required

Before providing a gift or other thing of value to a government official or employee, you must submit a [Gift Request](#) for legal review.

Learn More

- [Global Gift and Anti-Corruption Policy](#)
- [U.S. Public Sector Addendum to the Code of Conduct](#)

We're responsible with gifts.

We build relationships based on the products and services we offer and how we conduct business – in accordance with the highest ethical standards and in a way that's aligned to our Code and values. And while gifts are often a normal business practice and a traditional way of building relationships, certain gifts could improperly influence the recipient and are prohibited. Our [Global Gift and Anti-Corruption Policy](#) sets out DocuSign's practices for preventing corruption and properly offering, giving and accepting gifts.

What is a gift?

A "gift" is any thing of value, whether tangible or intangible, that is offered, promised or provided by one person to another, and whether provided directly or indirectly to a recipient. It includes:

- Holiday presents and commemorative mementos.
- DocuSign-branded items.
- Meals and refreshments.
- In-person or virtual entertainment, like golf or sporting events.
- Waived event fees or free access codes.
- Lodging, airfare, and transportation expenses.
- Prizes or awards from raffles and drawings.
- Certain non-standard discounts on products or services, or non-standard favorable contract terms.
- Donations made on someone's behalf.
- Special favors, like offers of employment.

Learn More

- [Global Gift and Anti-Corruption Policy](#)
- [U.S. Public Sector Addendum to the Code of Conduct](#)

When can I offer a gift?

Gifts are permitted only if they:

- Are unsolicited,
- Are given infrequently,
- Are provided for a legitimate business purpose (and not to gain improper influence),
- Have a total market value of less than US \$150 per year from the same source, and
- Have been approved in advance, if the recipient is a Government Official (regardless of value) or the value exceeds \$150 USD.

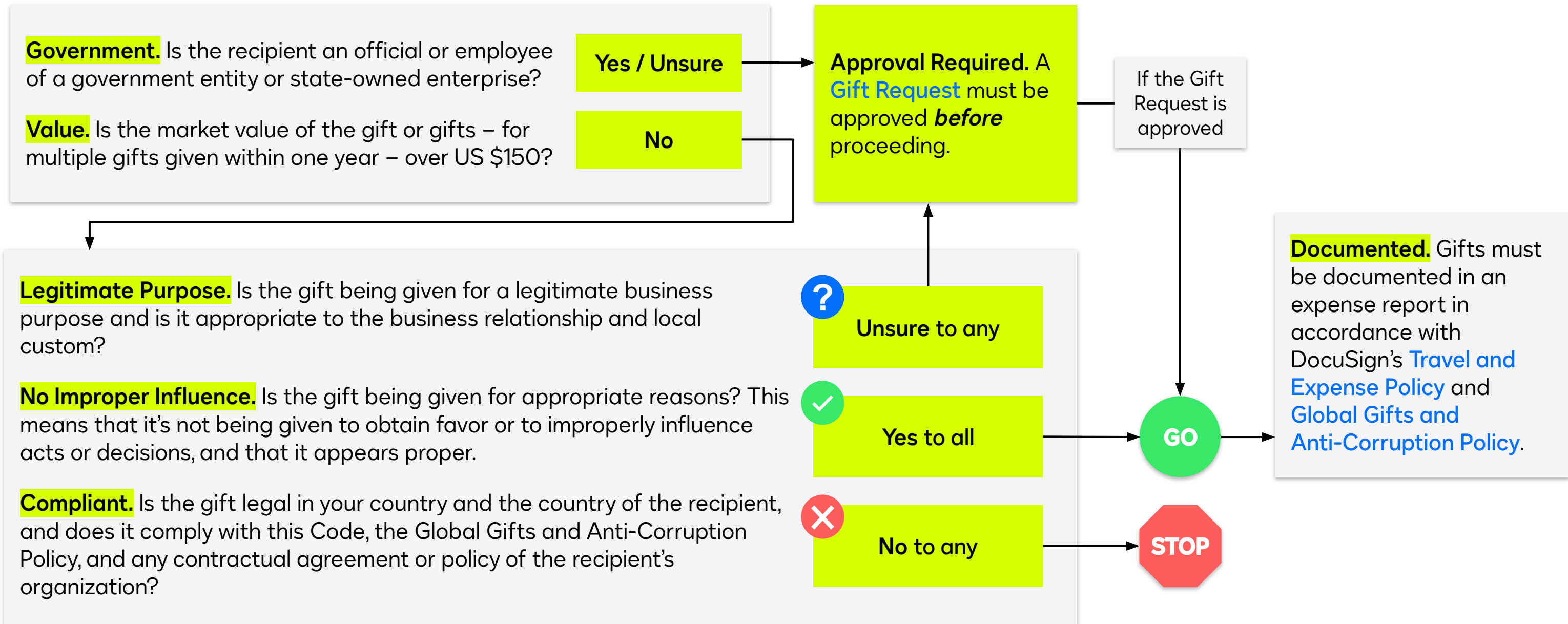
The diagram on the next page can help you decide whether or not it's ok to offer a gift.

When can I accept a gift?

The same conditions that apply to giving, listed above, also apply to accepting gifts. Submit a Gift Request for Legal review of any gift that exceeds US \$150 in value.

We're responsible with gifts.

How to decide if it's ok to offer a gift...



We engage responsibly with governments.

Doing business with Government

We sell to and support government customers in the United States and throughout the world. In doing so, we offer a better way for them to meet their missions and serve their constituents. But selling to government customers requires us to comply with unique regulatory and compliance obligations, many of which reach beyond our commercial practices. Transactions with government customers also require us to pay close attention to anti-corruption laws. If you sell to or support government customers, you must know and comply with the government provisions of the [Global Sales Operating Procedure](#). If your customers are in the U.S. public sector, or you interact with U.S. Government Officials, you must also know and comply with the [U.S. Public Sector Addendum](#). If your customers are outside of the U.S., consult [Rules of the Road: Selling to Governments and Government-Owned Entities](#) outside of the U.S. for helpful guidance.

Engaging in Political Activities

Company political activity. DocuSign participates in the political process through lobbying and government advocacy, which is regulated by lobbying, campaign finance and government gift laws. For example, we report certain communications with Government Officials, and we track and report on the lobbying we do at all levels of government. Our [political law compliance program](#) is designed to ensure DocuSign meets these unique requirements.

Employee political activity. As a private citizen, you may participate in elections and political activities, such as voting and contributing to the candidates and party of your choice. But you must act solely in your individual capacity, not as a representative of DocuSign, and you must use only your personal resources to do so. No DocuSign director, officer or employee may use their position at DocuSign to solicit contributions to political campaigns from other directors, officers, employees or other people or organizations who do business with us. Executives, officers and directors (and sometimes their spouses) may face additional regulation on contributions, by virtue of their role at DocuSign and the U.S. jurisdictions where we do business.

It's important to know when you may be interacting with a Government Official.

“Government Official” means anyone employed by, or acting on behalf of, a government entity at any level.

Government entities include national, regional, or local government departments, agencies, authorities, instrumentalities, or militaries. They also include state-owned enterprises – entities that are owned or controlled by government agencies, political parties, public international organizations – and organizations that perform government functions or are financed with taxpayer funds, such as public universities.

Questions? Contact govcompliance@docusign.com.

We conduct business fairly.

We compete fairly

We compete on the quality of our products and services. Doing so is in the best interest of our customers since it ensures our prices are competitive and indicative of the quality and merits of our products.

We follow antitrust and fair competition laws, and we are honest and accurate about the capabilities of our offerings, especially with customers. We avoid actions that restrict competition, like:

- Setting, raising or otherwise overtly agreeing on prices with competitors
- Dividing territories, markets or customers with competitors
- Preventing companies from entering a market
- Interfering with competitive bidding processes
- Improperly using or disclosing the confidential information of DocuSign or a competitor
- Making untruthful or unfair statements about competitors' products or services.

We work ethically with third parties

DocuSign works with vendors, suppliers, resellers, partners and other third parties around the world. We choose to work with companies that uphold our commitment to ethical business. We invest time and resources, including through security and anti-corruption due diligence, to confirm that potential partners and suppliers have a history of following the law and conducting business ethically. Our [Global Supplier Code of Conduct](#) sets out our expectations of DocuSign suppliers and partners.

If you're responsible for a relationship with a third party:

- Make clear that we expect them to meet our high ethical standards and comply with applicable law.
- Ensure your relationship isn't influenced by inappropriate [gifts](#) or business courtesies.
- If you have questions or concerns, [speak up!](#)

We foster an ethical workplace.

We are committed to respecting and promoting human rights by working with all stakeholders, including governments, industry, consumers, civil society, stockholders, and our customers. In all our operations:

- We do not accept the use of forced labor or child labor.
- We are committed to providing a work environment that is safe, respectful and free from unlawful discrimination and harassment.
- We respect our employees' privacy and lawful freedom of association.
- We compensate our employees fairly.
- We condemn the use of conflict minerals in our operations and expect our suppliers and partners to do the same.
- We are committed to conserving the environment and promoting sustainable business practices for our customers and suppliers.

In addition, we are committed to operating ethically and responsibly to ensure that there is no modern slavery or human trafficking in any part of our business or our supply chains. We take issues of illegal and unethical conduct seriously and report in good faith all known and suspected improper activities. Refer to our [Modern Slavery and Human Trafficking Statement](#) for additional information. If employees become aware of any potential issues regarding modern slavery and/or human trafficking in either our own business or in that of our suppliers, we expect them to raise these issues under the [Whistleblower and Complaint Policy](#) without fear of retribution or victimization.



We celebrate diversity.

We promote diversity

DocuSign is a global corporation with a talented and passionate workforce with people from across the globe. We are creative and innovative 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.

At DocuSign, we treat each individual fairly. We do not tolerate discrimination against any individual on the basis of their 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.

Protected characteristics include:

Race, color, religion, gender, age, marital status, national origin, sexual orientation, gender identity or expression, transgender status, citizenship status, disability, and others.



We treat others with respect

Our performance is directly impacted by how we are treated as individuals. We can't generate the passion or creativity DocuSign needs to compete unless we create an environment 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.



We work to improve our communities

We are committed to harnessing the power of DocuSign's people, products, and profits for good. Our goal is to make a difference in the global communities where our employees and customers live and work. We believe in promoting a culture of community engagement throughout our organization. Our employees are encouraged to take action in their own communities by supporting and volunteering with organizations and causes they believe in. We are proud to support that action by providing paid volunteer time off each year and offering a generous matching donation program. We also support high-impact initiatives through our corporate philanthropy program, which makes grants to organizations aligned with our impact priorities.

We dedicated to conserving the environment

Since our founding in 2003, DocuSign has enabled millions of customers around the world to realize productivity and efficiency gains in their business, while reducing their impact on the environment. We are dedicated to promoting sustainable business practices for our customers and suppliers, and aim to minimize environmental impacts. We are also committed to reducing our own impact on the environment by taking action on climate change. We've signed on to science based targets to halve our greenhouse gas emissions by 2030 and reach science-based net-zero no later than 2050. 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.



DocuSign®