



## Global Supplier Code of Conduct

*Adopted November 2022*

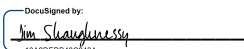
In addition to making the world more agreeable, DocuSign is dedicated to making our business a positive force for our customers, our employees, our communities, and the environment. We are committed to acting ethically in all of our business activities and expect the same from our distributors, resellers, solution and consulting partners, suppliers, vendors, service providers, and other third parties ("Suppliers").

This Global Supplier Code of Conduct ("Supplier Code") sets out DocuSign's expectations for our Suppliers. We expect you to know and follow all federal, state, provincial, and international laws and regulations that apply to your work - wherever you do business. You should also encourage third parties that you work with to comply with this Supplier Code and the laws that apply to their business.

We sincerely value Suppliers who join us in pursuing these common goals of integrity and ethical business practices. We believe that the trust of our customers, Suppliers and the community starts with a culture based on these fundamental values.

We look forward to working with your company and fostering a long-term relationship.

Sincerely,

DocuSigned by:  
  
James Shaughnessy  
Chief Legal Officer

## How to Report Concerns

At DocuSign, we act honestly, ethically and with integrity in all our business dealings and expect our Suppliers to hold themselves to the same standards for legal and ethical conduct. We are committed to creating an environment where our Suppliers are comfortable raising concerns. If you believe that someone is not meeting the standards in this Supplier Code or learn of an issue that could impact DocuSign, you should report your concerns by the following means:

1. By calling DocuSign's compliance hotline at (855) 857-6207;
2. By submitting a report online at [www.docusign.ethicspoint.com](http://www.docusign.ethicspoint.com);
3. By sending an email to [complianceofficer@docusign.com](mailto:complianceofficer@docusign.com); or
4. By letter addressed to DocuSign's corporate headquarters at 221 Main Street, Suite 1550, San Francisco, California 94105 marked "Attention: Compliance Officer".

DocuSign expects our Suppliers not to retaliate against any person who makes a sincere and honest report of a suspected or actual violation of our Supplier Code or the law.

## Our Responsibilities to Each Other

### Anti-Corruption

DocuSign expects our Suppliers to share our commitment to conducting business with integrity and transparency and to complying with all applicable anti-corruption laws. As a DocuSign Supplier, you must reject and strictly prohibit all forms of corruption and bribery, regardless of whether they involve a government official, government employee, DocuSign employee, customer, or any other person.

Corruption can take many forms, including:

- *Bribery*: Offering, authorizing, promising, giving, or accepting any *thing of value* to improperly influence the recipient's actions, even if not accepted by the recipient.
- *Kickbacks*: Returning, or offering to return, any *thing of value* as a reward for fostering a business arrangement.
- *Facilitation Payments*: Paying tips or making small payments to government officials to expedite administrative processes.

Corrupt actions don't have to include the offer or transfer of money for an improper purpose - offering any *thing of value*, whether tangible or not, could be considered corrupt. Examples include gift cards, event tickets, offers of employment, donations to charity, overbilling, free benefits that would be otherwise sold, business steered to a specific vendor, and some sales incentives/fees.

DocuSign also expects Suppliers to comply with all applicable laws prohibiting terrorist financing, as well as Anti-Money Laundering laws and regulations.

## Gifts, Entertainment, and Hospitality

As a DocuSign Supplier, we expect that you will only permit gifts, entertainment, and/or hospitality in connection with business activities you conduct on behalf of DocuSign if they:

- have a legitimate 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, are properly approved prior to giving any gift, entertainment, hospitality or travel.

Gifts, entertainment, and hospitality or travel for Government officials, government employees, and their families, are highly regulated and may be prohibited by law.

## Business with Government

DocuSign is committed to doing business with governments ethically and in compliance with all applicable laws, rules, regulations and contract clauses, including those related to government procurement, government ethics (including gifts, entertainment and hospitality), the hiring of government personnel, conflicts of interest, and marketing – and whether transactions occur directly or indirectly. We require the same from Suppliers that do business with government entities, entities owned or controlled by governments, or organizations that do business on behalf of governments. Suppliers that do business with governments may be subject to additional terms and conditions.

## Fair Competition

DocuSign is committed to complying with competition and antitrust laws. Our success depends on developing long-term relationships with our customers and Suppliers. We seek to enter into these relationships by applying the principles of fairness and equal treatment. DocuSign will not sacrifice a long-term relationship for a short-term gain and we will not take undue advantage of a business relationship. We expect the same from you. As a DocuSign Supplier, you must comply with all competition and antitrust laws and are prohibited from engaging in the following:

- *Price Fixing*: Sharing information or agreeing with competitors to charge certain prices.
- *Bid Rigging*: Coordinating with competitors during a competitive bidding process.
- *Market Allocation*: Dividing up markets by region, product, or customer.
- Any other action that unreasonably restricts competition or unfairly excludes competitors from the marketplace.

## Confidential Information and Intellectual Property

Confidential information is one of a company's most valuable assets. Confidential information includes:

- Intellectual property (such as trademarks, copyrights, patents, trade secrets or other types of intellectual property);
- Information about what we create and how we create it;
- Information about business plans and strategies;
- Information about people and organizations;
- Information about business processes;
- Information about corporate finances; and
- Other non-public information.

DocuSign protects our Suppliers' confidential information and you must protect DocuSign's confidential information by using the information only for the purpose for which DocuSign made it available to the Supplier, by following all applicable data privacy and information security laws and regulations, and by effectively managing the sharing, retention and disposal of the information.

DocuSign expects you to respect the intellectual property rights of DocuSign and others. You may not obtain, distribute, or use unlicensed copyrighted software or materials without prior written authorization.

These safeguarding obligations continue after the engagement has ended. If you learn of an actual or potential data security breach involving DocuSign information or misuse of DocuSign brands, trademarks or logos, you must notify DocuSign immediately or, otherwise, in accordance with the terms of your contract with DocuSign.

## Conflicts of Interest

You must avoid situations which could cause a conflict of interest, or create the appearance of one, involving your relationship with DocuSign. Situations that could create a conflict of interest include:

- Excessive hospitality or entertainment to a customer;
- Excessive hospitality or entertainment to a DocuSign employee;
- Improper advantages gained by using DocuSign's confidential information;
- DocuSign employees holding significant economic interest in an entity that does business with DocuSign.

## Insider Trading

As a DocuSign Supplier, you may have access to material, non-public information about DocuSign. You must not buy or sell securities while in possession of material, non-public information or provide that

information to Supplier employees or others who might trade on it or otherwise use it for their personal benefit.

## Trade Compliance

DocuSign complies with all applicable international trade laws and regulations regarding the provision, sale or transfer of DocuSign's products, services, technology, software and technical information, as well as trade sanctions, and we expect our Suppliers to do the same.

## Honesty and Accuracy

A culture of honesty, trustworthiness and promoting honest and ethical conduct is important to DocuSign. You must be honest and accurate in all representations made in connection with your business with DocuSign, whether orally or in writing.

## Accounting and Record Keeping

DocuSign relies on our books and records to create financial reports, make legal filings, and make business decisions. We require Suppliers to comply with applicable standard accounting practices and keep full, accurate, and timely books and records of all business transactions with DocuSign. DocuSign reserves the right to audit or inspect applicable Supplier books and records, including documentation related to compliance with this Supplier Code, as permitted by law. Such audits or inspections shall be conducted in accordance with the terms of the Supplier's contract with DocuSign.

## Training and Compliance

To ensure compliance with your obligations under this Supplier Code and all applicable laws and regulations, you must:

- Communicate the principles in this Supplier Code to your employees and your third-parties;
- Manage compliance with this Supplier Code;
- Report suspected and actual violations of this Supplier Code to DocuSign;
- Maintain the confidentiality of such reports, as permitted by law; and
- Protect employees from retaliation for making good faith reports.

## Our Responsibilities to Employees

We commit to being fair and treating everyone equally. That means equal pay, equal opportunity, equal everything. We expect our Suppliers to uphold similar values, create a positive environment for all their employees, and accept full responsibility for their own actions. Suppliers must remain committed to

carrying out business in an open, transparent and socially responsible manner and providing a safe work environment that respects the health and well-being of its workforce.

## Diversity and Non-Discrimination

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, gender identity or expression, transgender status, 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 Suppliers, investors, customers, and fellow community members as well. As a DocuSign Supplier, we expect you to integrate diversity into your own practices, to treat others with respect, and to strictly prohibit harassment or bullying in the workplace.

## Human Rights and Labor Standards

DocuSign is committed to a supply chain and supplier community that is safe, healthy and free from discrimination, harassment, intimidation, bullying, slavery and child labor. Please see our [DocuSign Modern Slavery and Human Trafficking Statement](#). Suppliers must provide safe and healthy work environments that comply with all applicable labor, health and safety laws and regulations, including those related to:

- Lawful employment, including validation of right to work;
- Wages and benefits, including working hours and overtime;
- Collective bargaining;
- Child labor, prison labor, modern slavery and human trafficking;

## Accessibility

Products, services and other technologies produced or used by DocuSign Suppliers must be accessible for persons with disabilities. Suppliers must provide documentation indicating the level of conformity of products and services that will be used by DocuSign with accessibility standards such as Section 508 of the United States Rehabilitation Act of 1973, and the current version of the international accessibility standard Web Content Accessibility Guidelines (WCAG) Level AA.

## Our Responsibilities to the Environment

DocuSign is committed to reducing our own impact on the environment by taking bold action to curb the worst effects of climate change. We have signed onto the Science-Based Targets Initiative's (SBTi) Business Ambition for 1.5°C campaign including committing to cutting emissions in half by 2030 and

reaching science-based net-zero no later than 2050 – we encourage our Suppliers to do the same. 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.

At a minimum, we expect you to follow all applicable environmental laws, regulations, and standards, including those related to the hazardous substances, chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, conflict minerals, air emissions, environmental permits, and environmental reporting. Please see our DocuSign Environmental Policy for more information about how DocuSign promotes environmental sustainability throughout our business globally, including how we select and engage Suppliers.

## Certification

As a DocuSign Supplier, you agree that, when required by DocuSign, you will have an authorized representative certify in writing that he or she has read and understood this Supplier Code and commits the Supplier to these standards.