

U.S. Public Sector Addendum to the Code of Conduct

As updated through December 2, 2025

Top 3 things you need to know

1. **Get Legal approval first.** You must get permission *before* offering anything of value, like meals or tickets, to any U.S. government employee.
 2. **Don't discuss DocuSign jobs.** If a government employee asks about employment, direct them to public job postings and contact Global Business Integrity *before* any discussion.
 3. **Safeguard government data strictly.** You must only handle sensitive data like CUI (Controlled Unclassified Information) in authorized IL-4 environments, *not* in standard FedRAMP Moderate systems.
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Top 3 things you need to do

1. **Receiving sensitive procurement info.** If you accidentally get a competitor's bid or internal "source selection information," stop, do not forward it, and report it immediately.
2. **Potential personal conflicts of interest.** You must disclose any financial interest or personal relationship that could—or just *appear* to—impair your impartial decision-making using the DocuSign Conflict of Interest form..
3. **Evidence of serious wrongdoing.** You must report credible evidence of activities like bribery, fraud, submitting false claims, or DocuSign receiving significant overpayments

Report issues to a manager, to the Global Business Integrity Team at integrity@docusign.com, or via the anonymous hotline at www.docusign.ethicspoint.com or 1-855-857-6207.

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Purpose

Docusign, Inc.'s (“**Docusign**” or the “**Company**”) commitment to doing business ethically includes how we transact and interact with United States federal, state, and local government entities, as well as with contractors and subcontractors that sell to those government entities in the U.S. Our government contracts business in the U.S. requires Docusign to comply with unique regulatory and ethics obligations, many of which reach beyond Docusign’s commercial practices. As part of this commitment, the Company has adopted this United States Public Sector Addendum (the “**Addendum**”), which expands upon the Docusign [Code of Conduct](#) (the “**Code**”).

Applicability

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 (such as customer support, revenue operations, sales operations, and technical personnel working on U.S. government environments).

All employees this Addendum applies to must read, understand and abide by it, along with the Code, all relevant Company policies, and all applicable laws and regulations. If you aren’t certain whether this Addendum and the referenced policies and regulations apply to you, or to a particular contract or relationship, contact the Global Business Integrity Team (integrity@docusign.com) for guidance.

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 risks to DocuSign's future business with the government. 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 or contact the Global Business Integrity Team (integrity@docuSign.com).

Dealings with U.S. Government Officials, Employees and Contractors

U.S. Government Officials

The [Global Gift and Anti-Corruption Policy](#) includes DocuSign's definition for Government Officials, which applies globally. For purposes of this Addendum, "Government Official" means anyone employed by, or acting on behalf of, a U.S. government entity at any level. These include federal, state, or local government departments, agencies, authorities, instrumentalities, or militaries. They also include government-owned enterprises – entities that are owned or controlled by government agencies, political parties, or public international organizations – and organizations that perform government functions or are financed with taxpayer funds, such as public universities.

Examples of Government Officials include:

- Elected officials, political appointees, and government employees,
- Political party officials and candidates for political office,
- Officers and employees of government-owned, -controlled or -funded businesses, schools, universities, hospitals, telecommunication companies, or other entities,
- Members of the military, and
- Members of public international organizations, like the United Nations or World Bank.

Gifts, Meals, Entertainment, and Hospitality

Docusign's [Global Gift and Anti-Corruption Policy](#) defines a "gift" as anything that could be considered to have value and that is offered, promised or provided by one person to another for free or for less than fair market value. Gifts can be tangible or intangible and include those provided directly to a recipient, and those offered through a partner or other third party. Examples of gifts include: meals, drinks, event tickets, conference fees, travel expenses, charitable contributions, offers of employment, favors or special discounts. The [Global Gift and Anti-Corruption Policy](#):

- Prohibits bribery; and
- Requires Legal Department review and approval before offering gifts, meals, entertainment, travel (including local transportation), or other hospitality to a Government Official, or a family member or guest of a Government Official.

Ethics rules usually permit Docusign to offer modest refreshments at hosted meetings, such as soft drinks, coffee, and donuts, as long as we do so infrequently and a legitimate business activity is involved. If we offer lunch or other meals, Government Officials may be required by their ethics codes to pay the fair value of their meals.

You must submit a [Gift Request](#) for Legal Department review before offering a gift to a Government Official.

Prohibition on Kickbacks, Sales Performance Incentive Funds (SPIFs) and Referral Fees

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. We must ensure those engagements are free of corruption or any other form of improper conduct, including:

- Offering, paying 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.
- Offering gifts to partners or accepting gifts from them that are designed to improperly influence or to obtain an unfair business advantage.
- Offering, paying or accepting Sales Performance Incentive Funds ("SPIFs") or referral fees. SPIFs are payments, rebates, or price concessions given to promote sales. Docusign does not offer to partners or allow partners to offer SPIFs in connection with our public sector business. (Docusign-internal SPIF programs that incentivize sales by Docusign employees to public sector customers are permitted.) We also prohibit the payment or acceptance of referral fees in connection with our public business. Both SPIFs and referral fees raise the risk of improper influence in the public sector space.

Avoiding Dealings With Suspended and/or Debarred Entities or Individuals

When contracting with U.S. government entities, Docusign must make sure any third parties we engage 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, and we must screen any third parties Docusign might use in connection with our federal contracts against that list. If you believe Docusign must contract, subcontract, or otherwise employ an individual or business entity on the list, you must request and receive approval from the Legal Department via integrity@docusign.com.

Hiring Former U.S. Government Officials

Current or former government personnel must comply with 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 factors like job titles and responsibilities. You must contact the Global Business Integrity Team (integrity@docusign.com) for guidance before discussing employment with any current or former U.S. federal, state or local government employee or official. This type of discussion carries increased risk for Docusign and is prohibited without prior authorization by Global Business Integrity (integrity@docusign.com). If a government official or employee asks you about employment at Docusign, you may direct them to Docusign's public job postings. Do not refer government personnel involved in Docusign matters to Docusign job openings, whether via a recruiting platform or other means. Employee referral bonuses as described in Docusign's Employee Referral Program will not be paid for referrals of government personnel for conflict of interest and anti-corruption reasons.

Truth and Accuracy in Our Dealings with Government Entities

The Federal False Claims Act and state law equivalents

The federal False Claims Act requires contractors to provide accurate information to the U.S. government. Many states have similar laws. This 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 if it's 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.

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 knowingly 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)

Docusign employees have a role to play in ensuring a fair and equal playing field in government procurement. Laws like the federal Procurement Integrity Act aim to prevent undue influence in the contracting process, and government entities enforce them strictly. These laws prohibit soliciting, obtaining, or otherwise disclosing government source selection information, or a competing contractor's proprietary bid or proposal information when a procurement is underway.

- "Bid or proposal information" includes cost or pricing information, cost build-up information and information marked as such under 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."

If you believe you have received "bid or proposal information," "source selection information," or other confidential or proprietary information, you must immediately:

- 1) Refrain from using or disclosing the information further, for any purpose, including to anyone else within the Company;
- 2) Contact the Global Business Integrity Team(integrity@docusign.com) and state that you believe you may have received sensitive information improperly. Do not forward the information itself. The Global Business Integrity Team will follow up with you.

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

Other Competitive Practices

While you may meet and talk with Docusign competitors, these discussions must never include confidential cost or pricing information (like our proposed pricing) or any suggestions or agreements about submitting (or not submitting) 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 products and services we sell are not as likely as others to create an OCI, we must still comply with all OCI-related prohibitions or requirements listed in our solicitations or contracts.

If you are asked for representations or certifications relating to OCIs, or for an OCI mitigation plan, contact the Global Business Integrity Team(integrity@docusign.com) for guidance before proceeding.

Personal Conflicts of Interest

The Code and [Conflict of Interest and Outside Activity Policy](#) 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 could prevent you from acting 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 Global Business Integrity Team (integrity@docuSign.com) as soon as possible, and remove yourself from any related decision-making authority. 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 a [Conflict of Interest and Outside Activity Disclosure Form](#).

Safeguarding Information

Confidential, Proprietary and Sensitive Information

You must safeguard DocuSign confidential and proprietary information, as well as information belonging to U.S. government entities, their representatives, and/or U.S. government contractors or subcontractors.

DocuSign and you must take special care with a category of U.S. government information called Controlled Unclassified Information (“**CUI**”). CUI refers to sensitive government information that requires safeguarding and dissemination controls by law or regulation. In practice, CUI:

- is sensitive information that has high national security value;
- can be created or processed by, or on behalf of, the government;
- can only be stored/processed in DocuSign’s Impact Level 4 (“IL-4”) environments (Note that DocuSign’s FedRAMP Moderate environments are not authorized to store or process CUI);
- is not so sensitive that it’s “Classified;” and
- is marked/designated “CUI” or “Controlled Unclassified Information.”

Examples of CUI include:

- Personally Identifiable Information, such as Social Security or driver’s license numbers;
- sensitive Personally Identifiable Information, such as citizenship status or criminal history; and
- export-controlled information.

In addition to the obligations set forth in the Code on protecting confidential information and intellectual property, U.S. government contracts may include stricter safeguarding requirements and may also prohibit the transmission of information outside the U.S., either physically or electronically. You must safeguard and access information in accordance with the Company’s

[Information Security Policy](#) and [Acceptable Use Policy](#) and with requirements specified in Docusign's government contracts. Direct any questions from government customers or internal sources about the treatment of confidential, propriety, or sensitive information to the Global Business Integrity Team (integrity@docusign.com).

Classified Information

You must not discuss, accept or retain classified information without the advance approval of the Global Business Integrity Team (integrity@docusign.com).

Record Keeping

The Code, this Addendum and Docusign's [Global Gift and Anti-Corruption Policy](#) require that all Company books and records be current, complete and accurate. For all U.S. government contracts, Docusign will retain all contract documents generated from proposal entry to contract closeout. We will retain these for the duration of contract performance and not less than three (3) years thereafter, unless a contract requires otherwise. When performing professional services or similar engagements, you must record time worked and activities performed, and address where work was performed, accurately, completely, and in a timely manner.

Lobbying Activities

Lobbying refers to efforts by individuals or entities to influence government actions or decisions. Docusign engages in lobbying, led by Government Affairs in the Legal Department, at U.S. federal, state and local levels of government. Strategic government advocacy helps advance Docusign's business and policy interests, but it also subjects the Company to strict regulation and unique compliance obligations that vary by jurisdiction. For example, Docusign must track and report its lobbying activity and must ensure that government contract proceeds aren't used to fund lobbying efforts. Docusign may also be required to report certain communications intended to influence U.S. government individuals or actions, and you may be required to register as a "lobbyist" 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 Global Business Integrity Team (integrity@docusign.com). Political

law is complicated, and a misstep in this space could cause Docusign to be fined or excluded from bidding for government contracts.

Political Activities

Company Political Activity

Docusign participates in the political process through lobbying and government advocacy, activities that are regulated by lobbying, campaign finance and government gift laws. Our political law compliance program helps Docusign meet these unique requirements. For example, we report certain communications with Government Officials, and we track and report on the lobbying we do at all levels of government. Also, as a government contractor, Docusign must follow “pay-to-play” laws that regulate political contributions from government contractors, and sometimes their employees. Our [“U.S. Political Contributions Rules of the Road”](#) offer more detailed guidance on this topic.

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, as long as you act solely in your individual capacity. You must not act as a representative of Docusign, and you must not use company resources in these activities. 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, and they must know and comply with those obligations. Our [“U.S. Political Contributions Rules of the Road”](#) includes [a chart](#) that summarizes campaign contribution restrictions by state and provides more detailed guidance on this topic. If you have questions or need guidance on campaign contributions or any other aspect of political law, please contact integrity@docusign.com.

Combating Human Trafficking

The U.S. federal government has a zero-tolerance human trafficking policy. 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 disciplinary action that may include 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 Global Business Integrity Team (integrity@docusign.com), or through the Docusign ethics hotline using the reporting procedures in our [Raising a Concern 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; and
- 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 immediately alert the Global Business Integrity Team (integrity@docusign.com), or use the reporting tools described in our [Raising a Concern Policy](#).

Other Requirements

Government contract compliance requirements may change as government entities shift priorities. Unique supply chain requirements currently apply to Docusign, as reflected in our [Section 889 Compliance Policy](#). This Addendum will be updated to address additional requirements as needed.

Enforcement and Reporting

When to Report Violations of this Addendum

The most difficult issue you face may be whether or not to report. When you encounter 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 have a concern about a potential or actual violation of this Addendum by others, you have a responsibility to report it through one of the channels listed below. Speaking up helps surface issues quickly, so that Docusign can address them and prevent more serious harm. To report suspected or actual violations:

- Raise the issue with your supervisor.
- Notify Global Business Integrity (integrity@docusign.com).
- Use the reporting procedures in our [Raising a Concern Policy](#).

Docusign will not retaliate or permit retaliation against any employee for reports made in good faith. Docusign has properly trained individuals who will investigate any alleged violation of this Addendum. 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).