



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This Modern Slavery and Human Trafficking Statement (Statement) is made by Coupa Software Incorporated (“**Coupa**”). This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and Section 14 of the Australian Modern Slavery Act 2018 and constitutes the Coupa modern slavery and human trafficking statement for the fiscal year ending January 31, 2023.

At Coupa, we aim for high standards of governance throughout our organization, and Environmental, Social, and Governance (“**ESG**”) is of primary importance to us. We recognize the responsibility we have towards our stakeholders including our investors, customers, employees, communities, and society as a whole. We seek to ensure that our suppliers do not use Modern Slavery in any of its forms in providing goods or services to Coupa. This statement demonstrates our commitment.

ABOUT COUPA SOFTWARE INCORPORATED

Coupa is a global cloud-based, Business Spend Management (“**BSM**”) software services company headquartered in California, USA. We see a global community of companies and leaders, united to make every business dollar spent more effective, equitable, and sustainable. Through the power of trillions of dollars in business spend, our mission is to unlock our customers’ full potential to do well and do good, anchored in a shared belief that we are smarter, together.

Coupa employed over 3,500 people in fiscal year 2023 (ending January 31, 2023).

Coupa is committed to acting ethically and promoting a workplace and supply chain that are free from modern slavery and human trafficking. We conduct our business according to our three core values of:

Ensuring Customer Success, Striving for Excellence and Focusing on Results

We hold these values very strongly in our business practices and are a signatory to the United Nations Global Compact, supporting the Ten Principles on human rights, labor, environment, and anti-corruption.

Our Business and Operations

Coupa offers a comprehensive technology solution that provides visibility into and control over how companies spend money. The core of our platform consists of procurement, invoicing, expense management, and payment modules. We also have solutions that help companies assess and manage risks in their own supply chains. Our customers can access our services through their web browsers or using an app on a mobile device.

Our primary business operational activities include product development, software engineering, customer support and management, and sales and marketing. Our direct workforce consists mainly of professionally qualified and skilled employees.

Our Supply Chain

Coupa relies on the use of suppliers to support high quality, effective, and efficient delivery of our services to customers. Our suppliers are predominantly registered business and professional services organizations, in particular companies that develop and license software or provide cloud-based applications or hosting solutions. Other areas of indirect spend primarily include marketing and other consulting services from third-party providers; travel, hospitality, and food catering services; back-office software services; computers and IT equipment; and general office supplies. The vast majority of our major suppliers are headquartered in low-risk countries.

Further details of our company can be found in our annual report available at investors.coupa.com.

*The outline of the Statement follows the guidance in the *Modern Slavery Act 2015* (UK) and the *Modern Slavery Act 2018* (Cth) (the Australian Modern Slavery Act)



RISKS AND ACTIONS

Based on the nature of our business, workforce, and the services we provide, we consider our business and direct supply chain to be lower risk for modern slavery. Nevertheless, Coupa recognizes that we have a role to play in the global effort to eliminate modern slavery and human trafficking, regardless of the level of pervasiveness across our industry.

Suppliers

We expect and require all of our suppliers to operate in a responsible, ethical, open, and transparent way and in compliance with all applicable laws and regulations.

We have taken the following actions:

- Administered our [Supplier Code of Conduct](#) which outlines minimum requirements for all of our suppliers, vendors, contractors, consultants, and other third-party providers of goods and services. Coupa expects our suppliers to respect its workers' human rights. Child labor, forced labor, and human trafficking are strictly forbidden. Suppliers are expected to agree to the Supplier Code of Conduct as indicated in terms in our Master Services Agreement and Purchase Orders or demonstrate that their own code of conduct meets comparable standards.
- Implemented our [Global Anti-Corruption and Bribery Policy](#), which outlines our commitment to conducting business with integrity and in accordance with the highest ethical standard. Coupa does not tolerate bribery or corruption in our operations. We also expect all suppliers to abide by this policy.
- Integrated Modern Slavery clauses for use as part of our supplier's contractual commitments to ensure that suppliers do not use Modern Slavery in any of its forms in providing goods or services to Coupa.
- Continued to assess the sustainability performance of our suppliers to understand current supplier risk. We request sustainability scorecards through our third-party sustainability ratings partner. The scorecards provide an assessment of suppliers' performance on human rights and labor, ethics, sustainable procurement, and environment. These assessments enhance Coupa's Modern Slavery risk mitigation strategies to ensure that Modern Slavery is not being used in our supply chain.

Internal Stakeholders

Coupa's policies and our company values represent the standards by which all our employees must operate. These values are outlined in our [Code of Conduct](#) and Employee Handbook. These principals by which we conduct our business outline our expectations to our employees to operate ethically and with integrity, which includes upholding human rights. Additionally, we conduct annual Code of Conduct training for all employees. Finally, our ethics hotline provides everyone a channel to anonymously report any ethical issues.

We understand that training is crucial to raising awareness of issues around modern slavery including how to spot signs of trafficking and where to report concerns. We provide employees with an e-learning course on Modern Slavery. We continue to raise awareness of Modern Slavery through sessions with our cross-functional ESG Working Group, which includes team members from procurement, workplace, legal, risk, and human resources.

Customers

We support our customers in minimizing human rights risks in their supply chain by incorporating key risk mitigation components in our BSM platform.


Looking Forward

As Coupa expands its business activities, Coupa remains committed to human rights and ensuring that no



Modern Slavery is involved in our operations or supply chain. We recognize the need to continually advance our practices to assess, manage, monitor, and avoid modern slavery and human trafficking risks. The Enterprise Risk Management program is tasked with identifying and driving mitigation of these risks through our committees and working groups. We will also continue to determine opportunities to increase employee awareness on this topic and support our customers in their own efforts through our supplier risk solutions and third-party ESG data provider assessments.

This Statement has been approved by the Board of Directors of Coupa Software Incorporated and is effective as of February 8, 2023.

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Rob Bernshteyn

Chairman of the Board

Date: February 8, 2023