



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, 2022.

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 investors, customers and other stakeholders, including our employees and society as a whole. Accordingly, we are proud to submit this Statement as a way of demonstrating our commitment.

ABOUT COUPA SOFTWARE INCORPORATED

Coupa is a global cloud-based, Business Spend Management (“**BSM**”) software services company headquartered in California, USA. Coupa employs over 3000 people. Coupa generates around \$725 million in revenues annually (FY2022).

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.

Over the past year, we took the following actions:

- Updated our [Supplier Code of Conduct](#), which outlines minimum requirements of 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.
- Integrated Modern Slavery clauses for use as part of our supplier's contractual commitments.
- 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.

Our Policies and Training

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. Last year we developed and shared with employees 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, cloud operations, and human resources. Additionally our product, customer, sales, and marketing teams regularly engage with customers and prospects on this topic as our Business Spend Management platform can potentially support customers in their own modern slavery efforts.

Additionally, Coupa conducts annual [Code of Conduct](#) training for all employees. The Coupa Code of Conduct outlines our expectations to our employees to operate ethically and with integrity, which includes upholding human rights. Our ethics hotline provides employees a channel to anonymously report on any ethical issues.

Looking Forward

We recognize the need to continually advance our practices to assess, manage, monitor, and avoid modern slavery and human trafficking risks. This year we aim to integrate any relevant ESG risks, including modern slavery, in our refreshed Enterprise Risk Management program. 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 providers.

This Statement has been approved by the board of directors of Coupa Software Incorporated.