Supplier Code of Conduct
Coupa Software, Inc

October 2020
Coupa Software Incorporated, together with our subsidiaries (collectively, “Coupa”), conduct our business according to our three core values of:

**Ensuring Customer Success**

**Striving for Excellence**

**Focusing on Results**

We hold these values very strongly in our business practices and in alignment with our commitment to the United Nations Global Compact, we also expect our suppliers to operate with integrity as we do at Coupa. Respect for people, human rights, the environment, and ethical practices are imperative for all of our suppliers, vendors, contractors, consultants, and other third-party providers of goods and services (whom we refer to collectively as “suppliers”) to uphold. This document is designed to document the minimum requirements of being a Coupa supplier.
Compliance We expect all our suppliers to adhere to this code of conduct and maintain a record of compliance of this policy. We reserve the right to request documentation of compliance with this code of conduct. We also expect all our suppliers to provide reasonable assistance to any investigation by Coupa of a violation of this Code.

Reporting Concerns We count on our suppliers to help our business succeed and to uphold our values and culture of integrity. If you believe that a Coupa employee or anyone acting on behalf of Coupa has engaged in illegal or unethical behavior, you should report your concerns to the following:

- Send an email or letter to our General Counsel at legalnotices@coupa.com or 1855 S. Grant St., San Mateo, CA 94402; or
- Report on our ethics hotline (anonymously or not), available at www.coupasoftware.ethicspoint.com (or by phone using the numbers listed on such website).

Ethics Any company that Coupa conducts business with should operate with high ethical standards and integrity. This includes but is not limited to avoiding all forms of bribery, abuse of power, corruption, theft, suppression, etc. We ask that any violators be reported to Coupa immediately.

Conflict of Interest Any potential conflict of interest engagements should be avoided and reported to Coupa.

Confidential Information Coupa is committed to high standards of data privacy and security, and it is imperative that you keep all Coupa data and information identified as “confidential” as such. The supplier must take appropriate measures to ensure proper handling, discussing, storing, and transmitting confidential or proprietary information.
As Coupa is a public company in the United States, we expect each supplier to take reasonable measures to ensure that its officers, employees, and other representatives comply with insider trading laws and regulations and its own internal policies governing the trading of publicly-traded securities, and refrain from trading securities of Coupa or any other company based on non-public information you receive from Coupa.

**Labor Laws & Human Rights** Coupa expects our suppliers to respect its workers’ human rights and to comply with all applicable international and local legal laws and regulations. Suppliers must maintain a work environment where workers are respected and treated humanely and fairly. Child labor is prohibited and suppliers must employ only workers who meet applicable legal age requirements. Forced labor - including prison, indentured, bonded, or slave labor - and any engagement in human trafficking is strictly forbidden. There should be no harsh and inhumane treatment of workers. Suppliers are required to comply with all applicable wage and hour, including overtime, labor laws in their countries of operations.

**Health, Safety, & Security** Suppliers must ensure that all of their employees are working in a safe environment, including complying with all applicable health and safety laws. Suppliers must ensure that all their employees are safe from physical, verbal, sexual, and psychological harassment and disciplinary measures should be put in place for any violators.

**Freedom of Association** Suppliers must respect the rights of employees to form and join trade unions and bargain collectively.

**Diversity & Inclusion** We are committed to improving our Diversity and Inclusion strategy and policy at Coupa and encourage our suppliers to do the same. Coupa encourages including diverse suppliers in sourcing events such as women-owned, minority-owned, LGBTQ-owned, veteran-owned businesses, etc. to promote inclusion and fair business practices.
We expect our suppliers to have a Diversity & Inclusion program and Coupa reserves the right to request these practices at any point in time.

We do not condone discrimination of any kind and will not conduct business with any company that does not hold the same value of acceptance and inclusion for all. This includes but is not limited to discrimination of ethnicity, race, gender, sexual orientation, religion, age, pregnancy, political opinion, etc. in activities such as recruiting, salary, promotions, termination, etc.

**Environment**  Coupa is committed to respecting and protecting our environment and expects suppliers to be environmentally responsible. At minimum, we require adherence to all applicable environmental laws, regulations, permits, licenses, and standards and encourage suppliers to have an environmental management system. Suppliers should be mindful and responsible in their business practices that may affect the environment. This includes conserving natural resources, reducing greenhouse gas emissions, minimizing waste, promoting recycling and reuse, and avoiding use of toxic and hazardous materials.

**Community Support**  Coupa seeks to work with suppliers who share our commitment to social impact and economic development in our local communities. We strongly encourage suppliers to engage with and contribute to the communities in which they operate.

**Coupa Code of Conduct**  For additional information regarding Coupa’s Code of Conduct (which is applicable to all our officers, directors and employees), please visit our website, [www.coupa.com](http://www.coupa.com), under Corporate Governance (within “Investors”).