

## 1. Purpose

This Artificial Intelligence (AI) policy aims to augment the Coupa Information Security Policy, establish AI guidelines and best practices, for the responsible and ethical use of AI within Coupa and Coupa products. It ensures that all stakeholders are using AI systems and platforms in a way that aligns with the company's values, adheres to legal and regulatory standards, and promotes our stakeholders' safety and well-being.

## 2. Scope

This policy applies to all employees, contractors, and partners (“Employees”) of Coupa who develop, use, or interact with AI systems, including but not limited to all large language models (LLMs), plugins and data enabled AI tools.

## 3. Policy

### 3.1. Responsible AI Use

Employees must use AI systems responsibly and ethically, avoiding any actions that could harm others, violate privacy, or facilitate malicious activities.

### 3.2. Compliance with Laws and Regulations

AI systems must be used in compliance with all applicable laws and regulations, including data protection, privacy, and intellectual property laws. Employees may reach out to Coupa’s legal team for guidance about applicable laws and regulations.

### 3.3. Transparency and Accountability

Employees must be transparent about the use of AI in their work, ensuring that stakeholders are aware of the technology's involvement in decision-making processes. Employees must utilize Coupa’s centralized process for AI governance and compliance efforts to ensure transparency of proposed and active AI initiatives. Employees are responsible for the outcomes generated by AI systems and should be prepared to explain and justify those outcomes.

### 3.4. Data Privacy and Security

Employees must adhere to Coupa’s Data Privacy and Information Security policies when using AI systems. They must ensure that any personal or sensitive data used by AI systems is anonymized and stored securely.

### 3.5. Bias and Fairness

Employees must actively work to identify and mitigate biases in AI systems. They should ensure that these systems are fair, inclusive, and do not discriminate against any individuals or groups.

### 3.6. Human-AI Collaboration

Employees should recognize the limitations of AI and always use their judgment when interpreting and acting on AI-generated recommendations. AI systems should be used as a tool to augment human decision-making, not replace it.

### 3.7. Training and Education

Employees who use AI systems must receive appropriate training on how to use them responsibly and effectively. They should also stay informed about advances in AI technology and potential ethical concerns.

### 3.8. Third-Party Services

When utilizing third-party AI services or platforms, Employees must ensure that the providers are vetted using the approved vendor risk and AI governance processes to ensure providers adhere to the same ethical standards, legal and security requirements as outlined in this policy.

## 4. Implementation and Monitoring

### 4.1. AI Governance

A multidisciplinary AI risk management team at Coupa ('AI Governance'), comprised of a diverse team of experts, including engineering, technology, data scientists, legal and compliance professionals, and ethics specialists creates and defines roles and responsibilities for designated committees critical to the oversight of Coupa's AI initiatives. (example, AI Ethics Committee, Third-party AI Risk Committee).

### **4.2. Designated AI Governance Committee**

**A designated AI Governance Committee is responsible for overseeing the implementation of this policy, providing guidance and support to employees, and validating compliance with relevant laws and regulations.**

### 4.3. Periodic Reviews

The AI Governance Committee conducts periodic reviews of AI systems used within the company to ensure adherence to this policy, identify any emerging risks, and recommend updates to the policy as necessary.

### 4.4. Incident Reporting

Employees must report any suspected violations of this policy or any potential ethical, legal, regulatory, or security concerns related to AI use to the AI Governance Committee or through the company's established reporting channels.

## 5. Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment, in accordance with Coupa's disciplinary policies and procedures.

## 6. Policy Review

This policy is reviewed annually or as needed, based on the evolution of AI technology and the regulatory landscape. Any material changes to the policy will be communicated to Employees.

## 7. Effective Date

This policy is effective as of July 3, 2024.