

Veracode Vendor Code of Conduct

August 28, 2024

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Revision History

Version	Date of Approval	Author	Description
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1. Purpose

Veracode, Inc. (together with its subsidiaries and affiliates, collectively referred to hereinafter as “Veracode” or the “Company”) believes that environmental, social and governance (“ESG”) factors are critical to our business, from both an opportunity and a risk-mitigation perspective. Therefore, we seek to properly assess, address, and monitor our impact on the environment; our relationships with employees, customers, vendors and the communities where we operate; and our governance of ESG issues. Veracode expects vendors engaged in providing products and services to Veracode (“Vendors”) to have, or to make, a similar commitment. The Veracode Vendor Code of Conduct (the “Code”) describes Veracode’s expectations of how its Vendors conduct business. Veracode expects Vendors to act in accordance with the Code, and at a minimum requires that all Vendors comply with applicable laws and regulations within the geographies where they operate and be open and cooperative with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws, Vendors must follow these expectations within the bounds of applicable local laws.

If you have any questions regarding this Code or suspect a violation of this Code, please contact legal@veracode.com.

2. Ethics & Integrity

Veracode is committed to conducting its business in accordance with the highest ethical standards, and in compliance with all applicable laws, rules, and regulations. Vendors are expected to share these principles, uphold these standards and develop policies and programs as appropriate to ensure that their workers understand and adhere to these standards.

A. Compliance with Laws, Regulations, and the Code

Vendors must comply with all laws and regulations applicable to their services and products in the jurisdictions in which they operate and the requirements in this Code. In cases where the Code sets higher standards than those in applicable laws or regulations, compliance with the Code is still mandatory. In the event the requirements of the Code conflict with laws, regulations, or international standards, we expect the Vendors to report such conflicts to Veracode to jointly establish the most appropriate course of action.

B. Anti-bribery & Anti-corruption

Vendors must comply with the requirements of all applicable laws and regulations designed to combat bribery and corruption. This includes the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, as well as local anti-bribery and anti-corruption laws. Vendors are prohibited from corruptly offering, providing, paying, authorizing, promising, soliciting or receiving anything of value directly or indirectly, for the purpose of obtaining or retaining business or any improper business advantage, or inducing, rewarding or seeking to influence the improper performance of a relevant function or activity. Vendors are also prohibited from routing or making illegal or inappropriate payments, including facilitation payments which are payments to public officials (including any persons exercising a public function or employees of government or state-owned/controlled entities) to expedite or secure performance of a routine, non-discretionary governmental action. Bribes can be anything of value including improper payments, such as

cash or kickbacks, or other direct or indirect inducements, benefits and advantages (including but not limited to inappropriate gifts, meals, travel, entertainment, charitable contributions, political contributions, and offers of employment or internships). Anything of value can also include corrupt payments disguised as legitimate payments for goods or services.

C. Public Sector Dealings

Activities that may be appropriate when dealing with non-public sector or non-government customers may be improper and even illegal when dealing with government entities, government-owned entities, government-controlled entities, or entities subject to government procurement rules (“Government Customers”). Vendors that do business with any Government Customers are responsible for knowing and complying with all laws, rules, and procurement regulations that relate to government contracting and interaction with Government Customer employees and officials, whether such action is direct or indirect. Examples include, but are not limited to the following: (1) Vendors must not attempt to obtain, directly or indirectly, from any source, procurement-sensitive information that is not publicly available or otherwise authorized for disclosure by the Government Customer, (2) Vendors must ensure the submission of accurate invoices to the government and comply with all laws regarding invoicing and payments, (3) Vendors must not give or offer any gratuity, gift, favor, or anything of value to any Government Customer employee or official except as is permitted by applicable law, (4) Vendors are required to establish and maintain appropriate internal controls to ensure compliance with all applicable local country and U.S. laws concerning Government Customer employees or officials, and (5) Vendors are responsible for ensuring compliance with all laws related to lobbying and political contributions, and such activities must only be undertaken in compliance with law and never with the intent of obtaining any improper or illegal benefit for Vendor or Veracode.

D. Gifts, Travel & Entertainment

Vendors must not provide lavish or otherwise inappropriate gifts, fees, favors, benefits, or other compensation, including travel and entertainment, that are intended to influence, or appear to influence, a business decision. The offering of gifts, travel, and entertainment may create an inappropriate obligation, expectation or appearance of an improper exchange.

E. Conflicts of Interest

Vendors must avoid conflicts of interests or improprieties, or the appearance of either. A conflict of interest may exist when a Vendor is involved in an activity that affects or could appear to affect objectivity.

F. Insider Trading

Vendors may have knowledge of confidential or proprietary information regarding Veracode and its customers or other third parties with relationships to Veracode and its customers. Proprietary information may include confidential information or material not made generally available to the public. Vendors must guard against the disclosure of this information.

G. Anti-tax Evasion and Anti-facilitation of Tax Evasion

Veracode does not tolerate unlawful tax evasion or the facilitation of unlawful tax evasion. Vendors must not directly or indirectly engage in, or facilitate the engagement by others in, the deliberate and fraudulent diversion of funds from a tax authority. Vendors are expected to ensure the same of their agents, subcontractors, intermediaries, and workers by adopting, maintaining and implementing reasonable processes that prevent such conduct.

3. Data Privacy and Security

Veracode understands data privacy and security's paramount importance. Veracode holds itself to a high data privacy and security standard and expects the same from its Vendors. Vendors must be knowledgeable and comply with all applicable laws, regulations, and industry standards relating to data security and privacy within the geographies which they operate. Personal information provided by or on behalf of Veracode should only be used, accessed, and disclosed as permitted by the agreement between the Vendor and Veracode.

A. Personal Information & Security

Vendors must adopt and maintain appropriate technical and organizational measures and processes to provide protections for personal data, proprietary and confidential information, including information that they access, receive or process on behalf of Veracode. Vendors should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the Vendor, the individuals whose personal information may be implicated, and for Veracode. Data breaches must be reported to the relevant national authority in accordance with applicable laws.

B. Intellectual Property

Vendors must not infringe on the intellectual property rights, including trademarks and copyrights of Veracode, its customers, or any third party.

4. Diversity, Equity and Inclusion

Veracode strongly believes in a world where each person has equal opportunity for success, and we understand how differing perspectives from diverse backgrounds can help bring new ideas to life. Veracode commits itself to diversity, equity, and inclusion, and expects its Vendors to mirror this principle.

A. Non-discrimination & Workplace Diversity

Vendors must comply with all applicable laws and regulations relating to discrimination in hiring, employment practices, and harassment and retaliation. Vendors must operate workplaces free of unequal treatment in employment, discrimination, harassment, victimization, and any other abuse or harm on any grounds relating to any groups including, but not limited to race, religion, skin color, ancestry, national origin, age, disability, sex, sexual orientation, or gender identity.

5. Employment, Working Conditions & Human Rights

A. Modern Slavery & Human Trafficking

Vendors shall not use forced, bonded, or indentured labor or involuntary prison labor. Vendors shall take steps to ensure that slavery or human trafficking is not taking place on its own business or in its supply chain.

B. Child Labor

Vendors shall not use or benefit from child labor. Vendors must adhere to minimum age provisions set forth in local laws and regulations and should not use workers under the legal age for employment. Prior to employing any worker, Vendors must review and validate all relevant documentation to ensure that such worker has the legal right to work in that jurisdiction.

C. Human Rights

Vendors must respect all internationally recognized human rights, avoid infringing on the human rights of others, and address negative impacts of business practices with which they are involved on human rights. Vendors should do so following the UN's Guiding Principles on Business and Human Rights.

D. Working Conditions

Vendors must commit to treating all employees and job applicants equally and fairly. Vendors must establish an environment where everyone is treated with respect and dignity, and not tolerate discrimination, harassment including but not limited to sexual harassment, or bullying of any kind in the workplace. Veracode is committed to preventing harassment of any kind in the workplace including but not limited to conduct related to one's race, religion, skin color, ancestry, national origin, age, disability, sex, sexual orientation, or gender identity that would reasonably be expected to cause offense, humiliation, or harm.

E. Non-retaliation for Reports of Concern

Veracode expects Vendors to have a policy and process in place for reporting of workplace concerns. The policy and process should be transparent and understandable and must provide protection from retaliation, for both reporters and for those participating in any related investigations.

F. Freedom of Association

Vendors must respect the right of employees to form, join, or not to join, trade unions and bargain collectively. If the right to the freedom of association is restricted by laws or regulations and the Vendor is not able to afford their employees with these freedoms, Vendors must allow alternative forms of worker compensation.

G. Employment Laws

Vendors must comply with all applicable local laws and regulations regarding employee compensation and employment. Veracode expects Vendors to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch, and outsourced labor shall be in accordance with local law.

6. Wellbeing, Health and Safety

Vendors must comply with all applicable health and safety regulations. Veracode expects Vendors to maintain practices to minimize health and safety risks, support accident prevention, and ensure a safe workplace for all workers, including employees and/or contractors and other third parties.

7. Environmental Sustainability

Veracode believes that environmental sustainability is important from a business and community perspective. We expect Vendors to share in this commitment and respond to challenges posed by climate change.

A. Environmental Impact

Vendors are encouraged to track, manage, and mitigate the environmental impact of their operations and strategies, including those of their Vendors. Vendors are expected to develop, implement, and maintain environmentally responsible business practices and take measures (where applicable) to ensure that adverse effects on the community, environment and natural resources are minimized. Veracode encourages its Vendors to take all reasonable measures to reduce their negative impact on the environment through adoption and promotion of programs such as recycling, waste reduction and conservation of natural resources.

B. Environmental Laws, Regulations and Standards

Veracode expects its Vendors to be compliant with all applicable environmental laws, regulations, and standards, including requirements for chemical and waste management, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting.

8. Compliance with Laws

Vendors must comply with all applicable laws, rules, and regulations, including, when applicable, laws or regulations of the United States Department of Commerce, the United States Department of the Treasury's Office of Foreign Assets Control, or any other United States or foreign agency or authority. Vendors must be able to represent that they are not named on any applicable U.S. or foreign government denied-party list.