

# HubSpot, Inc.

## Global Supplier Code of Conduct

### Introduction

At HubSpot, Inc. (“HubSpot”), we are committed to good governance and achieving the highest ethical and environmental standards for all our employees, and we expect the same from our Suppliers. We believe in developing and maintaining a culture in which our Suppliers support and practice our values and part of that is to abide by our Global Supplier Code of Conduct (“Supplier Code”).

Consistent with all our policies and procedures, including our [Code of Business Conduct and Ethics](#) and our [Human Rights Policy](#), any Supplier, its affiliate, subsidiary, or employee (each and collectively referred to as “Suppliers”) that provides goods or services to HubSpot is required to comply with the principles in this Supplier Code, and as well as with the laws and regulations that relate to their business responsibilities. Suppliers must ensure that the requirements are communicated, understood, and followed by all people working for them, including, but not limited to, direct employees, contract workers, and temporary workers.

The principles and values reflected in this Supplier Code align with HubSpot’s core values, as well as the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations (UN) Guiding Principles on Business and Human Rights, and the Ten Principles of the UN Global Compact, to which HubSpot is a signatory.

### Human and Labor Rights

**We are committed to building a company that prioritizes equity, diversity, inclusion, and respect for human and labor rights. Our expectation is that Suppliers will align with the tenets laid out in this section.**

#### *Diversity and Inclusion*

Suppliers should aim to embed diversity into their processes and hiring and set goals to further inclusion and equity in their workplaces and cultures. Suppliers, where available and appropriate, should support other Suppliers that maximize opportunities for minority, women, disabled persons, lesbian, gay, bi-sexual, transgender, and/or U.S. veteran-owned. For more information on HubSpot’s commitment to diversity and inclusion and our expectations of all Suppliers in our supply chain, visit our Diversity, Inclusion, and belonging [website](#).

#### *Anti-discrimination and Harassment*

Suppliers are expected to uphold non-discrimination practices in all aspects of employment, refraining from discrimination based on attributes such as race, color, gender, religion, age, disability, and other protected characteristics under federal, state, and local laws. Suppliers must maintain workplaces that are respectful and free from all forms of harassment, including physical, verbal, sexual, emotional, and psychological mistreatment.

#### *Freedom of Association and Collective Bargaining*

Suppliers should respect employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, Suppliers should establish a constructive dialogue with their freely chosen representatives and bargain in good faith. Suppliers are expected to share grievances about working conditions without fear of reprisal.

#### *Compensation and Working Hours*

Suppliers shall provide all employees with correct information regarding employees' wages and benefits, including overtime, if applicable. Suppliers shall ensure all working hours, including overtime, are within the maximum limits set by local laws. Suppliers shall commit to practicing fair hiring, termination, and evaluation practices.

#### *Modern Slavery, Human Trafficking, and Child Labor*

Suppliers must prohibit and take action to prevent acts of modern slavery, involuntary prison labor, or forced, bonded, slave, or indentured labor from occurring in their own operations and within their own supply chains. We expect Suppliers to adhere to all applicable anti-modern slavery and human trafficking laws and regulations, including, but not limited to, the UK's Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

Suppliers shall not employ child labor and must comply with minimum age provisions set forth in local laws, regulations, and international standards such as the ILO Conventions on Child Labour and UN Global Compact.

### **Occupational Health and Safety**

**The safety and health of our employees, and of employees across our value chain is of paramount importance.**

Suppliers must ensure that employees' workplaces are safe and healthy. This responsibility includes ensuring that, among other things, product safety regulations governing hazardous materials are upheld, appropriate first aid equipment is accessible and in good condition, and emergency preparedness plans are in place.

## **Ethical Business Practices**

**HubSpot conducts business with integrity in accordance with the highest ethical standards. We expect our suppliers to adhere to the same high standards detailed below.**

### *Anti-Corruption and Bribery*

Suppliers must not offer, give, promise, or authorize any bribe, gift, loan, fee, reward, or other advantage to any government official, government employee, customer, HubSpot employee, or other person to obtain any business or improperly influence any action or decision. Suppliers shall follow the United States Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act, and any anti-corruption laws in their countries of operation.

### *Data Privacy and Security*

Suppliers must adhere to all relevant privacy and information security laws and regulations concerning the gathering, storage, processing, transfer, and disclosure of personal data. It is essential for suppliers to uphold compliant information security and privacy protocols. Suppliers are obligated to safeguard data, including their own, HubSpot’s, and HubSpot’s customers’ and partners’ information, through the development of secure products, services, and robust internal procedures.

### *Trade Compliance*

Suppliers must comply fully with all applicable US and global trade laws and regulations when conducting business with HubSpot. Failure to comply could result in the loss or restriction of your or HubSpot’s trade privileges. Violation of these global trade laws and regulations may also result in fines and imprisonment. You are responsible for understanding how the global trade laws and regulations apply and for conforming to these global trade laws and regulations.

### *Insider Trading*

When conducting business with HubSpot, Suppliers may be exposed to material, non-public information about HubSpot. Suppliers must not buy or sell securities while in possession of material, non-public information or provide that information to Supplier employees or others who might trade on it or otherwise use it for their personal benefit.

### *Antitrust and Fair Competition*

When conducting business with or on behalf of HubSpot, Suppliers must not propose or enter into any formal or informal agreement that violates competition law. Suppliers must comply with all applicable antitrust and competition laws and regulations, including all US and local laws, and all competition law program rules that HubSpot publishes.

### *Conflicts of Interest*

We expect our Suppliers to help us avoid conflicts of interest by, for example, disclosing to HubSpot any known family or other personal relationships with HubSpot employees who may influence HubSpot's relationship with the Supplier, and not offering inappropriate business courtesies to HubSpot employees.

### *Intellectual Property and Confidential Information*

Suppliers are responsible for protecting and appropriately using all types of intellectual property, including patents, trade secrets, copyrights, trademarks, and confidential information (collectively, "IP"), whether the IP belongs to HubSpot, our customers, or a third party. Suppliers may only use HubSpot IP for HubSpot's benefit as permitted by all applicable agreements, and in compliance with US, local, and all other applicable laws. Suppliers may not misuse any HubSpot trademarks or copyrighted materials, or improperly disclose HubSpot's confidential information or trade secrets. Suppliers are also prohibited from infringing on the IP rights of third parties in any manner related to their status as our Suppliers. Suppliers must promptly notify HubSpot of any unauthorized uses of our IP by a third party.

### *Accurate Business Records and Financial Integrity*

Suppliers must keep accurate and complete business records related to their business with HubSpot and take precautions to prevent the dissemination of false or misleading financial data to HubSpot. Additionally, Suppliers are required to maintain and keep all financial and accounting records in compliance with relevant laws (local, federal, or global), industry standards, and established procedures governing the retention of documents and records.

### *HubSpot Assets*

HubSpot may provide Suppliers various technologies and tools to use as part of their work with HubSpot, and it is essential that they are utilized responsibly. Suppliers have the duty to safeguard both HubSpot's and our customers' assets. All HubSpot and HubSpot customer assets—be it funds, data, systems, equipment, materials, or facilities—must be utilized solely for their authorized and designated purposes, and Suppliers must take steps to prevent their misuse. Additionally, Suppliers with access to HubSpot's computing facilities or data must ensure protection against theft, negligence, and misuse.

## **Environmental Sustainability**

**We are committed to building a sustainable company, one that helps uplift the employees, communities, systems, and environment in which we operate, and we expect our Suppliers to conduct operations in an environmentally responsible manner.**

### *Environmental Compliance*

We require Suppliers operate with care for the environment and ensure compliance with all applicable laws and regulations regarding the protection for the environment in the country in which they operate.

### *Sustainable Operations*

Suppliers are encouraged to establish and implement sustainable business practices and demonstrate through disclosure of information and supporting data that they:

- Conserve natural resources, including water and raw materials
- Improve energy efficiency and minimize energy consumption
- Procure renewable energy
- Safely handle, store, and dispose of waste materials, including hazardous waste, prioritizing waste minimization at source, reuse, and recycling
- Prevent pollution
- Responsibly source minerals
- Minimize air emissions
- Measure and reduce greenhouse gas emissions

### *Climate Change*

We want to do business with Suppliers who are committed to tackling climate change. We seek to drive rapid, immediate, and sustained reductions in greenhouse gas emissions throughout our value chain by encouraging our Suppliers, to:

- Implement an environmental management system to track, measure, and improve environmental impacts
- Report to CDP, a global environmental disclosure survey, on an annual basis
- Set science-based emission reduction targets, especially for our Suppliers identified as top Suppliers by greenhouse gas emissions

### **Supplier Accountability**

Suppliers should monitor their own operations and supply chain through information requests, audits, or other forms of monitoring to ensure that our standards are met. We reserve the right to conduct audits or investigate Suppliers records and facilities to confirm compliance. We also reserve the right to update this Supplier Code and these requirements and use the data provided to us to evaluate our Suppliers.

Suppliers must cooperate with information requests or audits initiated by HubSpot, as well as HubSpot requests for certifications and participation in inquiries and investigations.

### **Compliance**

Obeying the law is the foundation of this Supplier Code and is at the heart of a successful relationship with our Suppliers. Suppliers must understand and comply with legal and regulatory requirements applicable to their business operations and cooperate with local, national, and international authorities. Where a standard for conduct addressed by this Supplier Code is also governed by existing law, Suppliers must meet the stricter applicable standard.

HubSpot appreciates its Suppliers' ongoing willingness to follow these standards and adhere to this Supplier Code. We hope that our Supplier Code makes our commitment and dedication clear - we prioritize ethical practices in all aspects of our business. This Supplier Code supplements, but does not supersede, any of our rights or obligations in our agreements with Suppliers.

Beyond legal and regulatory requirements and as we evolve our relationship with Suppliers, we may look to proactively work with certain Suppliers to help achieve mutually beneficial responsible business goals.

If noncompliance is discovered we will work with the supplier to implement an appropriate corrective action plan and/or seek other remedies consistent with legal or contractual rights.

As set forth in its publicly available charter, the Nominating, Governance, and Sustainability Committee of the HubSpot Board of Directors is responsible for providing oversight for HubSpot's sustainability program and related matters.

This Supplier Code is reviewed at least annually.

### **Reporting Concerns and Asking Questions**

We count on our Suppliers to help our business succeed and to uphold our values and our highest ethical and business standards. To meet this expectation, we are committed to creating an environment where our Suppliers feel comfortable reporting concerns and raising questions.

If you believe that someone associated either with HubSpot or with one of our Suppliers is not meeting a legal requirement, this Supplier Code, or other HubSpot policy, you should report your concerns.

You are encouraged to report your concerns to your primary HubSpot business partner or through our HubSpot Whistleblower Hotline, online at this [link](#) or by phone at 1 (800) 493-1348 in the US (international phone numbers are linked [here](#)). Where permitted by law, reports through the HubSpot Whistleblower Hotline can be made anonymously.

HubSpot will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of the Supplier Code.

Last reviewed and amended: [May 4, 2024]