



Supplier Code of Conduct



Table of Contents

1. The Code of Conduct	3
1.1. Introduction	3
2. Commercial Integrity	4
2.1. Bribery and Corruption	4
2.2. Gifts	4
2.3. Conflict of Interest	4
2.4. Financial Integrity	4
3. Labor and Human Rights	6
3.1. Equality and Discrimination	6
3.2. Sexual Harassment	6
3.3. Human Rights	6
3.4. Wages and Benefits	7
3.5. Workplace Health and Safety	7
4. WalkMe's Assets	8
4.1. Confidentiality and Data Protection	8
4.2. Intellectual Property	8
5. Environment	9
6. Closing notes	10

1. The Code of Conduct

1.1. Introduction

WalkMe Ltd. and its subsidiaries (“**WalkMe**”) are committed to upholding the highest ethical and legal standards while conducting its business. With this in mind, **WalkMe** expects not only our employees to act ethically and to comply with the law, the same commitment is expected from our suppliers. This Supplier Code of Conduct (the “**Code of Conduct**”) clarifies our global principles and expectations for establishing and maintaining a business relationship with **WalkMe**.

All **WalkMe** suppliers, partners, vendors, contractors, consultants and providers of goods and services (collectively, “**Suppliers**”) and their employees are required to understand and comply with this Code of Conduct and with all applicable laws, regulations and industry standards that relate to their operations. **WalkMe** considers commitment to these Code of Conduct principles when selecting a **Supplier** and **WalkMe** reserves the right to monitor **Supplier’s** ongoing compliance with these principles. **Suppliers** must apply equivalent standards of conduct to its employees and throughout its entire supply chain that follow both the spirit and the letter of this Code of Conduct.

It is your responsibility to safeguard against legal and ethical violations and to take appropriate action if you suspect that illegal or unethical business conduct has occurred or is occurring. Engaging in illegal or unethical business conduct can have serious consequences for you, including adverse action up to and including termination of **WalkMe’s** relationship with you, and even criminal or civil penalties.

2. Commercial Integrity

2.1. Bribery and Corruption

WalkMe does not tolerate any form of corruption, whether directly or indirectly. **Suppliers** are never to offer, give, or receive bribes or any improper offering for business gain. **Suppliers** are expected to comply with anti-corruption laws around the world.

Suppliers will:

- Not offer, promise and/or grant to public officials or private individuals or their family members, or accept/receive, either directly or indirectly, any type of benefit, payment, gift or form of entertainment that:
 - I. May be interpreted as conferring some type of advantage, tip, bribe or payment in violation of any law, including inappropriate and/or illegal payments to any individuals, whether associated with a public, private or non-profit entity; or
 - II. Violates any applicable law or regulation.
- Evaluate entertainment and leisure activities to ensure that such activities do not violate this Code of Conduct or the laws and regulations of the country or region in which they are operating.

2.2. Gifts

WalkMe's employees cannot accept, and **Suppliers** will not offer or give, neither directly nor indirectly, any gifts, gratuities or other benefits, which may improperly influence or reward a decision with respect to your relationship with **WalkMe** or which may be perceived to be an improper offering for business gain.

- **Suppliers** will not, directly or indirectly, reward or offer to reward any employee, agent or subcontractor of **WalkMe** for entering into a contract or for requesting the supply of goods or services.

2.3. Conflict of Interest

Suppliers must be transparent about any interests, activities, or relationships that might conflict (or appear to conflict) with the best interests of WalkMe. Therefore, Suppliers are required to disclose all actual or potential conflict of interest.

Suppliers will:

- Disclose, or ensure that its disclosed, if a **Partner** employee has a family or close personal relationship to a **WalkMe** employee;
- Not employ, or make payment to, any employee of **WalkMe** during the course of any transaction.

2.4. Financial Integrity

Suppliers' books, records, accounts, and financial statements must be maintained in appropriate detail so that they properly reflect **Partner's** business activities.

Suppliers will:

Ensure that all business records are accurate, meet regulatory requirements and comply with industry standards and its internal controls;

Maintain business records in accordance with the applicable retention periods;

3. Labor and Human Rights

3.1. Equality and Discrimination

WalkMe celebrates cultural and individual diversity and fosters an environment of inclusion. **WalkMe** does not permit or tolerate any form of discrimination, whether due to race, color, nationality, origin, religion, gender, sexual preference, social class, marital status, age, weight, height, physical disability or any other inappropriate criteria. Similarly, we expect that our **Suppliers** will not take or tolerate any discriminatory, harassing, or retaliatory action against anyone in their workplace or while conducting **WalkMe's** business.

Suppliers will:

- Respect and value the diversity and the right of others to express thoughts, ideas, and opinions;
- Foster an atmosphere of openness, teamwork and trust;
- Not tolerate discriminatory behavior; and
- Never engage in bullying or harassment, or any behaviors that could reasonably be viewed as offensive or intimidating.

3.2. Sexual Harassment

While all types of harassment are prohibited, sexual harassment requires particular attention. **WalkMe** prohibits sexual harassment of any kind and we expect that our **Suppliers** will not tolerate any conduct that constitutes sexual harassment. Sexual harassment includes, among others, sexual advances, requests for sexual favors, and verbal or physical conduct, or any other form of communication, of a sexual nature when: (a) submission to or rejection of such advances, requests or conduct is made by either explicitly or implicitly a term or condition of employment or as a basis for employment related decisions; or (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Suppliers will:

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- Promote an atmosphere free of any type of sexual harassment; and
- Not tolerate any conduct that constitutes sexual harassment.

3.3. Human Rights

WalkMe sees human rights, as integral to our vision of creating economic opportunity for the world's workforce. **Suppliers** are expected to respect and enrich global communities by using only voluntary labor, prohibit the use of child labor and all forms of forced or compulsory labor in its entire supply chain. Slavery, servitude, forced labour and human trafficking (Modern Slavery) are global and growing issues. These have come to prominence given the rapid rise in global migration that exists in every region in the world and in all

economies, whether industrialized or developing. They impact all sectors and industries. **WalkMe** has a zero tolerance approach to Modern Slavery within our own operations and our supply chains. All stakeholders in our business and supply chain have a responsibility to be alert to these risks, however small.

3.4. Wages and Benefits

Suppliers will ensure everyone you work with is fairly compensated for the work they do. As such, **Suppliers** will comply with all applicable wage and hour, benefits, taxes and government regulations as an employer.

3.5. Workplace Health and Safety

WalkMe is committed to providing safe and healthy working conditions for our employees and all guests on **WalkMe's** sites. Likewise, **Suppliers** are expected to maintain safe and healthy working conditions.

Suppliers will:

- Comply with all health and workplace safety regulations and practices that apply to their work;
- Provide a safe and healthy work environment to help prevent accidents or injury arising out of, associated with or occurring in the course of work;
- Ensure and promote a respectful, non-violent work environment that is free of threats, intimidation, and physical harm;
- Implement occupational health and safety management systems and controls that identify hazards and assess risks related to their specific industry; and
- Provide training for their employees, ensuring they are educated on health and safety issues.

4. WalkMe's Assets

4.1. Confidentiality and Data Protection

WalkMe expects our **Suppliers** to safeguard confidential information and personal data by keeping it secure. **Suppliers** may receive **WalkMe's** confidential information only as authorized pursuant to confidentiality/non-disclosure obligations agreed to by all parties.

Suppliers will adhere to the confidentiality/non-disclosure obligations agreed between us, including but not limited to:

- Keep confidential information safe from loss, theft, or accidental disclosure;
- Limit access to confidential information only to those individuals who have a need to know in order to do their job;
- Comply with all applicable data privacy laws and regulations;
- Implement information security safeguards design to protect personal information that **WalkMe** may provide in accordance with industry standards; and
- Only use **WalkMe's** confidential information and data for legitimate business purposes.

4.2. Intellectual Property

Suppliers are expected to respect **WalkMe's** intellectual property rights and other companies with whom we work, obtaining all necessary supporting agreements to provide information, services, and other deliverables.

5. Environment

WalkMe is committed to conduct its business in an environmentally responsible way. Likewise, **Suppliers** are expected to be conscious of their impact on the environment.

Suppliers will:

- Take into consideration the environmental implications of their actions;
- Comply with all applicable environmental laws and regulations;
- Challenge and promote the reduction of unsustainable activities, including the wasting of water, energy, single use plastics, paper and other resources, and not recycling effectively;
- Support local environmental sustainability initiatives; and
- Seek opportunities to work with suppliers that agree to be obligated by not less restrictive commitments.

6. Closing notes

Our partnerships are important to us. If you have any questions about the guidelines set forth in this Code of Conduct, or if you suspect a possible violation of this Code of Conduct, or the law, don't hesitate to reach out to us at legal@walkme.com.

As our business continues to grow and our needs evolve, we may revise this Code of Conduct to reflect changes in our policies or the law. **Suppliers** are expected to comply with the most current version of the Code of Conduct at all times. If **WalkMe** becomes aware of any actions or conditions not in compliance with this Code of Conduct, **WalkMe** reserves the right to seek corrective action and/or terminate any engagement with such non-complaint **Partner**.