

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](#), we expect any supplier, its affiliate, subsidiary, or employee (each and collectively referred to as "Suppliers") that provides goods or services to HubSpot to operate in accordance with the principles and requirements, as applicable, in this Supplier Code, and in full compliance with the laws and regulations that relate to their business responsibilities.

Human and Labor Rights

We are committed to building a company that prioritizes equity, diversity, inclusion, and respect for human and labor rights, Suppliers should adhere to the following:

Diversity and Inclusion

Suppliers will aim to embed diversity into their processes and hiring and set goals to further inclusion and equity in their workplaces and cultures.

Suppliers will provide a workplace free of harassment and discrimination by treating their employees fairly and respectfully and not discriminate against any employee based on their age, disability, gender, race, color, religion, sexual orientation, national origin, ethnicity, veteran's status, or any other status protected by applicable law.

Suppliers, where available and appropriate, should support other suppliers that maximize opportunities for minority, women, disabled person, lesbian, gay, bi-sexual, transgender, and/or U.S. veteran-owned.

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, & Child Labor

Suppliers must prohibit and take affirmative 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 in force from time to time, including the UK's Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth).

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.

Should we become aware of any violations or issues related to slavery, human trafficking, or child labor in any part of a Supplier's supply chain, we will consult our legal team to ensure that appropriate measures are taken.

Safe & Healthy Workplace

The safety and health of our employees, and of employees across our value chain is of paramount importance, and we expect our Suppliers to provide a safe and healthy workplace for their employees.

Workplace Protection and Prevention

Suppliers must provide employees with a clean, safe, and healthy workplace including minimizing exposure to safety hazards. Suppliers' employees should feel safe to report any dangerous or unsanitary work environment.

Culture of Ethics

Suppliers are expected to conduct business in accordance with the highest ethical standards and act with integrity.

Anti-Corruption & Bribery

Suppliers shall follow all anti-corruption laws in their countries of operation and any law that implements the United States Foreign Corrupt Practices Act ("FCPA").

Privacy

Suppliers shall comply with all applicable privacy and information security laws and regulations related to the collection, storage, processing, transfer, and sharing of personal information and maintain compliant information security and privacy policies and procedures.

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

Suppliers shall 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, for example:

- 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, prioritizing waste minimization at source, reuse and recycling
- Responsible sourcing of minerals
- Measure and reduce greenhouse gas emissions

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 response business goals.

As set forth in its publicly available charter, the Nominating and ESG Committee of the HubSpot Board of Directors is responsible for providing oversight for HubSpot's environmental, social, and governance program and related matters. This Supplier Code is reviewed at least annually.