

LastPass...|

SUPPLIER CODE OF CONDUCT

(Last Updated June 2023)

INTRODUCTION

This Supplier Code of Conduct (this “Code”) sets forth LastPass’ expectations for any individual or entity, including its employees, agents and affiliates, that is a business partner to LastPass or otherwise sells, or seeks to sell, goods or services to or on behalf of LastPass (referred to herein as a “Supplier”). At LastPass, we expect all of our Suppliers, and our Suppliers’ suppliers, to demonstrate a commitment to business ethics, human rights, health, safety and environmental responsibility whenever conducting business with and/or on behalf of LastPass.

BUSINESS PRACTICES AND ETHICS

LastPass prides itself on operating its business in accordance with high standards of integrity and business ethics, and we seek to do business with Suppliers who uphold the same values in their own business practices.

- **Confidentiality:** Suppliers shall use confidential information received from LastPass only as authorized by LastPass for the purpose of providing services to LastPass. Likewise, we request Suppliers abide by any lawful obligations that they have to other clients and not share their other clients confidential information with LastPass.
- **Honest and ethical conduct and fair dealing:** We expect our Suppliers to deal honestly, ethically and fairly with all of their business partners and competitors. Statements and other records involving their business should not be untrue, misleading, deceptive or fraudulent.

Additionally, Suppliers shall seek to prohibit all forms of corruption, extortion and embezzlement, and follow all applicable antitrust and competition laws. In particular, Suppliers should not:

- Fix or control prices;
 - Split potential markets or customers; or
 - Take any other actions that unreasonably limit competition.
- **Gifts and gratuities:** LastPass is committed to observing the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act (“FCPA”) and the anti-corruption and anti-money laundering laws of the countries in which LastPass operates. Therefore, Suppliers shall not use their funds or assets for gifts, gratuities, kickbacks or other favors to business partners, competitors or government officials, except to the extent such gifts are in compliance with applicable law, insignificant in amount and not given in consideration or expectation of any action by the recipient. In addition, Suppliers should prohibit their employees, officers, directors and their respective immediate family from accepting any material gifts, gratuities or other favors from any customer or other person engaging in or seeking to engage in business with such Supplier. Unless of insignificant value, gifts and gratuities should be returned immediately or redirected for charitable disposition. Suppliers should exercise common sense and moderation when engaging in business entertainment. Suppliers should provide, or accept, business entertainment only if it is infrequent, modest and intended to serve legitimate business goals. On the other hand, bribes, kickbacks and other forms of grease payments are strictly prohibited.

HUMAN RIGHTS AND LABOR STANDARDS

At LastPass, we believe that all workers in our global supply chain deserve to be treated with dignity and respect. We are committed to ensuring that our policies and programs incorporate internationally recognized human rights standards, such as those set forth by the International Labour Organization (“ILO”), and equal opportunity in the workplace. We ask that all of our employees, directors, partners, and Suppliers uphold these same human rights standards, regardless of their geographic location of business.

- **Wages and Benefits:** Suppliers should follow all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, including all legally required benefits to their employees.
- **Collective Bargaining and Freedom of Association:** Suppliers should respect their workers’ rights to engage in labor negotiations, including lawful collective bargaining, as well as the rights of their employees to affiliate or refuse to affiliate with lawful organizations, such as trade unions or worker organizations.
- **Freedom from Harassment:** Suppliers should be committed to ensuring a workplace free of verbal abuse or harassment, mental and physical coercion, psychological harassment, sexual harassment or any other form of threats, violence or inhumane treatment.
- **Nondiscrimination:** Suppliers should not tolerate any discrimination on the basis of race, creed, religion, color, ancestry, sex, age, marital status, national origin, veteran status, genetic information, disability, sexual orientation or any other classification protected by law. When selecting Suppliers, we may consider as a factor whether Suppliers have a policy of promoting economic inclusion by providing equal opportunities.
- **Prohibition of Child Labor:** Suppliers must not use child labor in any stage of the business when rendering services to LastPass. A “child” is defined as anyone under the age of 15, under the age of completing compulsory education, or under the minimum age of employment, whichever is greatest. Workplace learning programs for students under the age of 18 may be permitted if conducted in compliance with the local laws. However, Suppliers should protect each students’ rights and underaged workers may not perform jobs that are either hazardous in nature or administered in a manner that is likely to jeopardize the workers’ health and safety.
- **Prevention of Slavery and Human Trafficking:** LastPass prohibits all forms of human trafficking and modern slavery in any part of their business and therefore expects Suppliers to prohibit the use of forced or involuntary labor of any type (e.g. forced, bonded, indentured or involuntary prison labor) in their supply chain. We are committed to doing our part to ensure that slavery and human trafficking are not occurring anywhere in our supply chains. We have a zero-tolerance policy regarding human trafficking and slavery and upon discovering any Supplier’s failure to meet these standards regarding slavery and trafficking, LastPass will move to discontinue business relations with such Supplier.

HEALTH AND SAFETY

Suppliers are expected to provide a healthy and safe working environment that, at a minimum, complies with all applicable health and safety laws, local regulations and practices. Adequate steps should be taken to identify, assess and mitigate any potential occupational hazards, including but not limited to hazards related to energy sources, fire, vehicles, chemicals and machinery employed in the workplace. When injury occurs despite the preventative measures, Suppliers should ensure their workers are able to promptly report the incident and receive necessary medical care.

In preparation for an emergency, Suppliers should periodically assess potential risks and have systems in place to respond to such emergency, such as evacuation procedures, employee notification, exit facilities, regular drills and

detailed recovery plans.

Each Supplier's workplace should be equipped with sanitary toilet facilities. Each Supplier's workers should be provided with access to potable water and sanitary food preparation, storage, and dining facilities. If applicable, worker dormitories provided by the Supplier should be safe, habitable and compliant with local housing law and regulation.

ENVIRONMENTAL PROTECTION

LastPass believes that technology and corporations can make a meaningful impact on the environment and the overall health of our planet. We have established our own Environmental, Social & Corporate Governance Principles (which can be found on our [LastPass Legal Center](#)) and are committed to ensuring that we are providing a safe, inclusive and positive workplace for our employees while also conducting our operations in an environmentally responsible manner. In line with our environmental initiatives, we strive to work with Suppliers who share similar goals. At a minimum, Suppliers should comply with all applicable environmental laws, regulations and standards within their respective industries. LastPass also encourages its Suppliers to incorporate sustainability goals and measures designed to minimize the environmental impact of their products and services.

REPORTING OF QUESTIONABLE BEHAVIOR

If you wish to report a Supplier for unethical or questionable behavior or a potential violation of this Code, you may contact LastPass's Global Procurement Department at globalprocurement@lastpass.com with a copy to your local LastPass contact.

LastPass is committed to continuously reviewing and updating its policies and procedures. LastPass therefore reserves the right to amend, modify or terminate this Code at any time and for any reason, subject to applicable law.