Veeva

Code of Conduct

Message from our CEO

Dear Veeva employees,

Since our founding, we have charted our own path with a vision of the transformative potential of industry-specific technology. In pursuing that vision, we have been guided by our core values: do the right thing, customer success, employee success, and speed.

We are a Delaware Public Benefit Corporation (PBC) whose public benefit purpose is “to help make the industries we serve more productive and create high-quality employment opportunities in our communities.” Our status as a PBC means our Board must consider the long-term view and balance the interests of our stakeholders, including customers, employees, and shareholders, and we must also pursue our PBC purpose.

Veeva is not all about the money. We are here to build a durable company that strives to deliver significant value to its customers, employees, and shareholders and that considers its impact on society.

Business moves at the speed of trust. Our customers, employees, and shareholders trust Veeva now through our actions over many years. We all must do our part to keep that trust. Individual actions speak louder than corporate words.

These principles shaped the company and are the values that will carry us into the future. Our code of conduct reinforces our vision, values, and purpose.

Sincerely,



Peter Gassner
Founder & Chief Executive Officer

Code of Conduct

This Code of Conduct and our company values—do the right thing, customer success, and employee success—represent the standards by which we all must operate. All employees of Veeva Systems Inc. or any subsidiary of Veeva Systems Inc. (collectively, "Veeva"), as well as Veeva's officers and Board members, must abide by this Code of Conduct. Veeva publishes its Code of Conduct in English, Chinese, and Japanese. Employees are trained when they start at Veeva and at least annually thereafter, and they are required to provide confirmation that they have read and understood the Code of Conduct. We also expect Veeva's contractors, consultants, and agents to abide by our Code of Conduct in connection with their work for Veeva. For our suppliers, we have a Supplier Code of Conduct, which sets out our expectations for the ethical behavior of suppliers.

We strongly endorse the use of common sense and good judgment.

We believe that common sense and good judgment are real and important. They have withstood the test of time. We are sure common sense and good judgment will continue to serve us well, and we use them in our business decisions at Veeva.

We operate with honesty and integrity.

We are open, transparent, and honest. We keep our commitments to each other, to our customers, and to our partners. We endeavor to communicate with our customers, partners, fellow employees, and suppliers in an honest and unambiguous way and to avoid making any misstatements of fact, making misleading or exaggerated communications, or creating false impressions. We may make mistakes, but we quickly admit and correct them.

We value diversity and treat others fairly and respectfully.

We celebrate diversity and believe it makes us strong. Diversity comes in many forms—gender, gender identity or expression, race, color, ethnicity, national origin, religion, politics, sexual orientation, age, disability, marital status, pregnancy, union membership, veteran status, and life experience—which shape us all into unique people. We provide equal opportunity in all aspects of employment and do not tolerate discrimination, harassment, violence, or threatening behavior of any kind. We always treat others with dignity and respect.

We uphold human rights and fair labor practices.

We respect human rights and provide fair working conditions. We prohibit and have a zero-tolerance approach to any form of forced, compulsory, or child labor, slavery, or human trafficking. We pursue fair employment practices in every aspect of our business and respect our employees'

right to freedom of association and collective bargaining. We are committed to acting ethically and with integrity in all our business relationships around the world.

We are responsible and law abiding.

We do the right thing. Period. We follow international, national, and local laws, rules, and regulations. We report wrongdoing, including fraud or illegal acts, if we encounter it.

We do not permit bribery.

Veeva's policy against bribery is clear—we never make or accept bribes to advance our business. A bribe is something of value that is offered or given to improperly influence a decision. Bribes often consist of money, but they could also be disguised as gifts, trips, entertainment, charitable donations, favors, or jobs. We do not offer, give, or accept anything of value for an improper or corrupt purpose, whether in dealings with a government official or the private sector, regardless of the norms of local custom. For more information, please consult Veeva's Global Anti-Corruption Policy and Global Anti-Corruption Guidelines, which we are all required to review and follow.

We avoid conflicts of interest.

We have a responsibility to make sound business decisions strictly on the basis of Veeva's best interests without regard to our personal interests. A conflict of interest can occur when our personal activities, investments, or associations compromise our judgment or ability to act in the best interest of Veeva. We avoid conflicts of interest, or even the appearance of a conflict of interest, and other activities that could harm or reflect negatively on Veeva.

Always disclose any relationships, associations, or activities that may create actual, potential, or perceived conflicts of interest to Veeva's General Counsel as soon as you become aware of any potential for such conflict.

We respect corporate opportunities.

We may not take for ourselves opportunities that are discovered through the use of Veeva property, information, or position, and we will not use Veeva property, information, or position for personal gain, or compete with Veeva in any manner. We owe Veeva a duty to advance its legitimate business interests when business opportunities arise.

We do not permit insider trading.

Federal law prohibits trading on the basis of material non-public information and "tipping" others by providing material non-public information to them. Material non-public information is information that has not been released to the public and which a reasonable investor would find useful in determining whether to buy or sell stock, e.g., financial results, sales results, acquisitions, customer wins or losses, or changes in senior management. We do not buy or sell stocks on the basis of material non-public information, or pass such information to any others, including friends or family. For more information, please consult Veeva's Insider Trading Policy, which we are all required to review and follow.

We safeguard confidential information and protect employee privacy.

We are committed to protecting the confidential, proprietary, and private information of our employees, customers, partners, and others with whom we do business. We respect and safeguard the private information and intellectual property entrusted to us by our fellow employees, customers, and third parties, using it only for legitimate business purposes or in accordance with all applicable laws and governing contracts. We are all also responsible for protecting Veeva's confidential information. The loss of confidential information can be extremely damaging to Veeva. We do not disclose any confidential Veeva information without a valid business purpose and proper authorization by our Legal department. Our obligations in this respect continue even if our employment or other relationship with Veeva ends. If we have questions about the use or disclosure of confidential, proprietary, or private information, we reach out to Veeva's Legal department.

We are committed to a safe and healthy working environment.

We are committed to providing a clean, safe, healthy, secure, and drug-free workplace. Our employees have responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and by reporting accidents, injuries and unsafe conditions, procedures, and behaviors. We do not tolerate discrimination, harassment, violence, or threatening behavior of any kind. We do not permit the use, possession, sale, or being under the influence of any illegal substance at Veeva or when representing Veeva in any capacity or conducting Veeva business. For certain work-related events, the consumption of alcohol may be permissible. Please consult Veeva's Alcohol Policy, which we are all required to follow.

We maintain accurate and complete business and financial records.

We create and maintain financial records in accordance with applicable legal requirements and generally accepted accounting practices. Our SEC reports, disclosures, and other public communications must be full, fair, accurate, timely, and understandable. Although financial reporting and controls are especially applicable to members of Veeva's Finance department, we are each responsible for complying with all financial controls and policies. We each acknowledge our responsibility to make sure that appropriate Finance department personnel are made aware, in a timely manner, of any fact or issue that might have a material impact on our financial statements or financial disclosures.

We represent Veeva to the public only when authorized.

Only those authorized to do so by Veeva's Investor Relations and Communications Policy may speak on behalf of Veeva to the press and members of the financial community. For more information, please consult Veeva's Investor Relations and Communications Policy.

We use social media wisely.

We use social media appropriately and responsibly. We do not disclose confidential Veeva information or the confidential information of our customers, suppliers, business partners, or other employees. Only those authorized may speak for Veeva, including through social media channels.

We deal fairly.

We endeavor to deal fairly with our customers, suppliers, competitors, and employees. We should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair dealing. Applicable laws specifically prohibit us from colluding with a competitor. When interacting with a competitor, questions about whether our actions are proper and in compliance with the law should be directed to our General Counsel.

We protect and properly use Veeva assets.

Theft, carelessness, and waste have a direct impact on our profitability. We use Veeva assets for legitimate business purposes, and in particular, will use Veeva's information systems assets in a responsible manner consistent with Veeva's Standards of Acceptable Use.

We respect the environment.

We conduct our business in an environmentally responsible and sustainable manner, and we are committed to complying with all applicable environmental laws. For further information on Veeva's approach to environmental sustainability, please see Veeva's Environmental Policy.

Waivers of the Code of Conduct.

Waivers of our Code of Conduct must be approved in writing. Waivers for Board members and executive officers require Board approval, while waivers involving any other employee, agent, or contractor require the approval of our General Counsel.

Violations of the Code of Conduct, Veeva policies, or the law.

Anyone who violates the law, our Code of Conduct, or other Veeva policies or procedures may be disciplined, including termination of employment and/or his or her business relationship with Veeva, in accordance with local legal requirements. Certain violations of this Code may be violations of the law, which may result in civil or criminal penalties, and Veeva will cooperate fully with the appropriate authorities in these situations.

Report violations.

If you witness or even suspect a violation of our Code of Conduct, Veeva policies, or the law, promptly report it to your manager or our General Counsel or via our whistleblower hotline.

Whistleblower hotline.

Veeva has established a whistleblower hotline that you may use to make an anonymous report. To make a good-faith, anonymous report, you may:

Send a letter to our General Counsel at 4280 Hacienda Drive, Pleasanton, CA 94588; or

Report on our ethics or whistleblower hotline (anonymously or not) by phone at 1.855.595.9577 or online at veeva.ethicspoint.com.

For more information, please consult Veeva's Whistleblower Policy.

No retaliation.

Veeva takes its non-retaliatory culture very seriously and will not allow anyone to take adverse action, threaten, intimidate, or retaliate if one of us reports a violation or suspected violation in good faith, or cooperates in an investigation. Veeva considers retaliation itself a violation of this Code and will respond accordingly.

Reporting outside the United States.

In some locations outside of the United States, anonymous reporting of certain types of issues may not be allowed by local law. If local law prohibits or restricts anonymous reporting, you should reveal your identity when making a report. In those situations, your identity will be kept confidential (unless prohibited by local law), and you will have a right to access and modify your report. If you are in doubt about the requirements of your local law, please contact our General Counsel.

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