



Supplier Code of Conduct

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Veeva is committed to conducting its business in an ethical, legal, and socially responsible manner. We expect the same of our suppliers, including their employees, agents, and subcontractors (collectively, “Suppliers”). This Veeva Supplier Code of Conduct sets out Veeva’s expectations of its Suppliers.

Speaking up and doing the right thing.

At Veeva, 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. Veeva expects its Suppliers to do the same. If a Supplier believes that a Veeva employee, or anyone acting on behalf of Veeva or a Supplier, has engaged in illegal or otherwise improper conduct with respect to their business, such Supplier will report the matter to Veeva. 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;
- Report on our ethics or whistleblower hotline (anonymously or not) by phone at 1.855.595.9577; or
- Complete a report online at veeva.ethicspoint.com.

The whistleblower hotline is anonymous, available 24 hours a day, seven days a week, and is available in multiple languages. In some locations outside of the United States, anonymous reporting of certain types of issues may not be allowed by local law. If you are in doubt about the requirements of your local law, please check with your legal department.

We do not permit bribery or corruption.

Veeva’s policy against bribery is clear—Suppliers may never make or accept bribes to advance 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. Suppliers will not offer, give, or accept anything of value to gain an advantage in obtaining business or for any other improper or corrupt purpose, whether in dealings with Veeva, a government official, or another entity, regardless of the norms of local custom. Further, Suppliers will not use agents, advisors, subcontractors, distributors, or other intermediaries to carry out similar acts. Suppliers are expected to follow all laws and regulations on bribery, corruption, money laundering, terrorist financing, and other prohibited business practices, including but not limited to the Foreign Corrupt Practices Act, the United Kingdom Bribery Act, and other anti-corruption laws.

Conflicts of interest.

Veeva requires its Suppliers to avoid any conflicts of interest in their dealings with Veeva. A

Supplier agrees to disclose any relationships with a Veeva employee or director that may create actual, potential, or perceived conflicts of interest, including any family relationships between such Supplier and Veeva employees or directors, and any known investment or ownership interest in such Supplier by a Veeva employee or director (other than the ownership of less than 1% of the outstanding stock if a publicly traded company). Such reports should be made to purchasing@veeva.com.

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. Suppliers will not buy or sell stocks (including Veeva’s stock) on the basis of material non-public information, or pass such information to any others, including friends or family.

Safeguarding Veeva confidential information.

Suppliers must always protect Veeva’s assets, confidential information, and intellectual property. Suppliers must not disclose and may only use Veeva’s intellectual property and confidential information for purposes of the business relationship. If there is any doubt, Suppliers may ask Veeva for clarification and/or permission. Suppliers will maintain confidentiality agreements with all Supplier employees, agents, advisors, subcontractors, distributors, or other intermediaries that obligates such personnel to maintain the confidentiality of Veeva confidential information.

Data Privacy.

Suppliers are expected to understand and comply with all applicable laws and regulations related to data privacy and information security. Suppliers must manage the processing of personal data provided to them by Veeva (if applicable) in accordance with applicable laws and regulations and in accordance with any contractual data processing commitments and instructions entered into with Veeva.

Publicity.

Suppliers will not make public communications on Veeva’s behalf, or publish marketing materials, press releases, or media interviews that include reference to Veeva, or the work Suppliers are performing with or on behalf of Veeva, without Veeva’s prior written consent from an individual authorized to grant such consent.

Valuing diversity; no discrimination or harassment.

Veeva celebrates diversity and believes it makes us strong. Diversity comes in many forms which shape us all into unique people. Veeva provides and expects Suppliers to provide an equal opportunity workplace. Suppliers must refrain from engaging in any form of discrimination or harassment based upon race, ethnicity, color, national origin, religion, age, disability, gender, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or veteran status.

Upholding human rights and fair labor practices.

Veeva respects human rights and provides fair working conditions. We prohibit and have a zero-tolerance approach to any form of forced, compulsory, or child labor, slavery, human trafficking, violence, or threatening behavior of any kind, and we expect the same of our Suppliers. Furthermore, Suppliers are expected to comply with applicable labor laws including hours, wages, and working conditions.

Respecting the environment.

Veeva conducts its business in an environmentally responsible and sustainable manner, and we are committed to complying with all applicable environmental laws. Suppliers must comply with all applicable environmental laws and are expected to conduct their business in an environmentally responsible manner. Environmentally responsible practices include using and consuming resources responsibly; improving energy efficiency; promoting the reuse; recycling and recovery of materials; reducing waste generation; and reducing greenhouse gas emissions, atmospheric emissions, and water discharges, if any.

Debarment.

Suppliers must not be and must not at any time use, in any capacity, in connection with the supply of its goods and/or performance of its services, the services of any person debarred or proposed for debarment under (i) 21 U.S.C. § 335(a) or (b), (ii) Subsection 306(a) or (b) of the Federal Food, Drug and Cosmetic Act, (iii) the Specially Designated Nationals and Blocked Persons List maintained by the U.S. Treasury, (iv) the United Nations Security Sanctions List, (v) the System for Award Management Exclusion List, (vi) the FDA Debarment List, or (vii) otherwise disqualified or suspended from performing clinical research study, excluded from participation in any Federal health care program or otherwise subject to any restrictions or sanctions by the Federal Drug Administration or any other regulatory authority or professional body with respect to the performance of scientific or clinical investigations.

Suppliers must not be and must not use any person in any capacity to perform any services for or on behalf of Veeva, that is listed on any Government Restriction Lists, including the OIG “List of Excluded Individuals/Entities” and the U.S. General Service Administration “Excluded Parties List System”.

Suppliers shall screen all personnel that work with Veeva on any matters to ensure compliance with the above requirements. Confirmation of these processes and reasonable demonstration of compliance should be timely made available upon reasonable request by Veeva.

Fair Competition.

Suppliers will conduct their business consistent with all applicable laws and regulations regarding fair competition. Suppliers will comply with all applicable antitrust laws and regulations.

Export Control.

Suppliers will have appropriate policies governing all applicable import and export controls, sanctions, and other applicable trade compliance laws. Suppliers will not conduct business with individuals, companies, organizations, or government entities from or located in a sanctioned country.