BrowserStack

COMPLIANCE

BrowserStack Supplier Code of Conduct

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1.0 INTRODUCTION

There is a wide spectrum of cloud service providers providing a variety of different cloud computing models. Data protection considerations do not apply to all cloud models in the same way. The extent to which cloud computing services providers process personal data and the extent of their control over handling that data depends on the type of cloud computing services being offered. As such, providers of different cloud computing services have different roles and responsibilities, particularly data protection and data security.

Browserstack is recognized as the world's leading software testing platform, helping many well-known organizations to be able to deliver quality software at speed by moving testing to our Cloud.

Browserstack's Supplier Code of Conduct ("Code") encapsulates our respect for the law and individuals and our responsibilities to our clients and stakeholders. It provides the basis for our ethical culture.

We at Browserstack,

- Follow the legal requirements of all locations where we do business.
- Conduct ourselves in ways that are consistent with the Code, Company policies and procedures, and laws.
- Speak up if we have concerns or suspect violations of the Code, Company policies and procedures, or laws.
- When requested, certify that we have reviewed, understand, and agree to follow the Code.
- Understand that following the Code is a mandatory part of our job.

Browserstack is committed to operating within ethical and professional standards, laws, regulations, internal policies, and core values.

Compliance with this Code, laws, and regulations

Third Parties shall comply with applicable local and international laws and regulations and are expected to comply with this Code. To the extent any applicable law or regulation is more restrictive than this Code, such law or regulation shall govern.

Browserstack expects Third Parties to implement policies, procedures, and training deemed necessary by the Third Party to comply with this Code.

Note: For the avoidance of doubt, the term "Third Party" shall include Browserstack's customers, consultants, sub-processors, suppliers, clients, amongst others.

2.0 AN EQUAL OPPORTUNITY WORKPLACE FREE OF DISCRIMINATION & HARASSMENT

At Browserstack, we strive to provide a work environment free of discrimination and harassment. We are an equal opportunity employer, and employment decisions are based on merit and business needs.

We are committed to following fair employment practices that provide equal opportunities to all employees. We do not discriminate or allow harassment based on race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, parental status, political ideology, military/ veteran status, or trade union activity or any other legally protected status. At Browserstack, we value diversity and believe that a diverse workplace builds a competitive advantage.

Browserstack ensures that its employees are afforded an employment environment free from physical, psychological, and verbal harassment or other abusive conduct. Furthermore, Browserstack strives to provide a safe and healthy working environment for its employees. We are committed to complying with all employment discrimination laws.

3.0 HEALTH AND SAFETY OF EMPLOYEES

Browserstack makes proper provisions for the health, safety, and welfare of its employees, workers, visitors, contractors, and anyone affected by its activities. We ensure maintaining safe and healthy working conditions according to the local laws and regulations and integrating sound health and safety management practices into our business. We also provide our employees and workers with the right and means to refuse unsafe work and report unhealthy working conditions to the Human Resources department.

4.0 LABOUR & HUMAN RIGHTS AND HUMAN TRAFFICKING

Browserstack and its employees do not (i) tolerate, engage in, or support Slavery, Human Trafficking, Forced Labour, Child Labour, or exploitation through Browserstack's activities, or (ii) assist Browserstack customers or any other party in doing so. Browserstack does not employ anyone under the age of 15 or under the legal minimum working age for employment, whichever requirement is most restrictive.

We ensure compliance with minimum working hours and minimum wages prescribed by applicable laws and regulations and comply with all slavery and human trafficking applicable local laws in the country or countries we operate. We strictly ensure that we have taken steps to keep our business operations free from slavery and human trafficking practices internally and within our supply chains and other external business relationships. Ensure that employees are not be charged any fees or costs for recruitment, directly or indirectly.

5.0 ETHICS IN OUR BUSINESS ACTIVITIES

Browserstack does not tolerate corruption or bribery in any form. Soliciting, accepting, offering, promising, paying bribes, or making other improper payments, including facilitation payments, is strictly prohibited, whether directly or through any third party. We do not tolerate any form of and do not engage in unlawful corruption or bribery, including any payment or other form of the benefit conferred on any government official to influence decision-making in violation of the law. Corruption is anti-competitive, increases the costs of doing business globally, and introduces significant uncertainty. Bribery thus raises the risks of doing business, putting a company's bottom line and reputation in jeopardy. Companies that pay bribes to win business ultimately undermine their own long-term interests and the best interests of their investors.

As a global company, apart from the Prevention of Corruption Act, 1988 (India), Browserstack is subject to all relevant anti-corruption laws, including the U.S. Foreign Corruption Prevention Act (FCPA) and the Bribery Act 2010 (U.K.). These prohibit bribery of government officials and commercial partners.

In connection with certain holidays and other occasions, it is customary in many parts of the world to give gifts of nominal value to customers, government officials, and other parties who have a business relationship with Browserstack.

When an employee/ worker of Browserstack makes a gift to a customer, a government official, or any third party, they keep the following in mind:

- It is not done to obtain or retain business or gain an improper advantage in business;
- It is lawful under the laws of the country where the gift is being given and permitted under the policies of the client;
- It constitutes a bona fide promotion of goodwill expenditure;
- It is not in the form of cash;
- The gift is of nominal value (on an individual and aggregate basis);
- The gift is accurately recorded in the Company's books and records;

6.0 FAIR DEALING, FRAUD, AND DECEPTION

Browserstack does not seek to gain an advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer, or any third party and any misappropriation of property.

Browserstack deals fairly with its customers, suppliers, partners, service providers, competitors, and anyone else with whom it interacts while at work. Browserstack ensures not taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair dealing practice.

7.0 TRANSACTING WITH THIRD PARTIES

Browserstack strived, to the extent reasonably practicable, to directly interact with government officials. However, if third party agents are required to interface with government authorities on behalf of Browserstack, we verify the credentials and reputation of such a third party agent before any agreement with them and ensure that a formal contract is executed, including appropriate provisions requiring the third party agent to comply with applicable anti-corruption and local laws. We ensure that the fee, commission, or other remuneration paid to intermediaries or third-party agents is reasonable, bona fide, and commensurate with the functions and services performed. We keep track of such expenses to be fairly and accurately reflected in Browserstack's books of accounts.

8.0 CONFLICT OF INTEREST

Browserstack has implemented policies intended to avoid all conflicts of interest or situations that could lead to a potential conflict of interest, including policies enabling employees in conflict of interest (whether actual or potential) to provide notification to their line managers. This includes a conflict between the professional activities of the Browserstack's employees and their personal interests or those of their close relatives, friends, or associates, whether through personal relationships, investments, or directorships.

9.0 WHISTLEBLOWER PROTECTION

Suppliers should either (i) maintain a whistle-blower hotline or similar process for its employees to report violations of this BrowserStack Supplier Code or any related integrity concerns involving work for BrowserStack, or (ii) allow its employees to have access to the BrowserStack Whistle-Blower Email Id. Suppliers shall maintain programs to ensure the confidentiality, anonymity and protection of Supplier and employee whistle-blowers, unless prohibited by law. In either case, Suppliers have an affirmative obligation to promptly report to BrowserStack any information or allegation it receives related to a violation of this Supplier Code of Conduct. A Supplier must also promptly inform BrowserStack if it becomes aware that any employee or any third party has raised any claim or complaint against BrowserStack. All reports to BrowserStack should be made at whistleblower@browserstack.com.

10.0 CONFIDENTIAL INFORMATION OF CLIENTS AND THIRD PARTIES

Browserstack employees have access to significant amounts of client information that may not be available to the public. Browserstack has taken all necessary steps required to preserve the confidentiality of information obtained in client service.

Information of a confidential, private, and sensitive nature is used responsibly, controlled, and protected to prevent prohibited, arbitrary, or careless disclosure and is not used for personal and professional advantage.

Unless the client has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to disclose, Browserstack is strictly prohibited from disclosing confidential client information.

11.0 FREE AND FAIR COMPETITION

At Browserstack, we believe that a free and fair market benefits all of us and ensures that our clients receive the best quality products and services at the best prices. Most countries we operate in have laws to encourage and protect free and fair market competition by regulating anti-competitive conduct, including unfair acts by market leaders. These laws regulate our relationships with our customers, competitors, distributors, and resellers.

- Anti-trust laws generally address the following areas: Unfair pricing practices (including price discrimination), secret rebates, exclusive dealerships or distributorships that are questionable, restrictions on carrying competing products, and other practices.
- Browserstack endeavors not to knowingly make false or misleading statements regarding its competitors or the products and services of its competitors, customers, or suppliers.
- Collusion among competitors is illegal. Browserstack's communications with competitors always avoid subjects such as prices or other terms and conditions of sale, customers, and suppliers. Browserstack and its employees/workers to not enter into any agreement or understanding, written or oral, express or implied, with any competitor on these subjects.

12.0 MAINTAIN ACCURATE RECORDS

Browserstack ensures accurate records and does not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction fully and accurately represent the transaction or event being documented. Records are retained based on the applicable retention requirements.

13.0 GLOBAL TRADE COMPLIANCE

In its use of the Services, Browserstack agrees to comply with all export and import laws and regulations of the United States and other applicable jurisdictions. Without limiting the foregoing, (i) Browserstack represents and warrants that it is not listed on any U.S. government list of prohibited or restricted parties or located in (or a national of) a country that is subject to a U.S. government embargo or that has been designated by the U.S. government as a "terrorist supporting" country, (ii) Browserstack does not (and does not permit any of its customers to) access or use the Services in violation of any U.S. export embargo,

prohibition or restriction, and (iii) Browserstack does not submit any information that is controlled under the U.S. International Traffic in Arms Regulations.

14.0 PROTECTING THE ENVIRONMENT

BrowserStack operates in an environmentally sustainable manner and is committed to protecting and respecting the environment. Considering our business needs, customer requirements, and the desire to minimize the adverse effects on the environment, we maintain our facilities, run our business operations and responsibly develop products. In particular, we assure the environmental integrity of our processes and facilities at all times. We are built on the idea of preserving the natural environment by following sustainable business practices and minimizing our impact on the environment.

We outline our commitment to protecting and respecting the environment in our Supplier Code of Conduct and affirm our expectation that our suppliers comply with all applicable environmental regulations. As an organization, we consider environmental and human rights impacts in all of our business activities. We include our environmental expectations from our suppliers in our Supplier Code of Conduct which is a part of our master service agreements. BrowserStack is committed to managing environmental impact as an integral part of all operations.

15.0 OFAC

In its provision of the Services, Supplier agrees to comply with all export and import laws and regulations of the United States and other applicable jurisdictions. Without limiting the foregoing, (i) Supplier represents and warrants that it is not listed on any U.S. government list of prohibited or restricted parties or located in (or a national of) a country that is subject to a U.S. government embargo or that has been designated by the U.S. government as a “terrorist supporting” country, (ii) Supplier will not (and will not permit any of its agents, subcontractors to) access or provide the Services in violation of any U.S. export embargo, prohibition or restriction, and (iii) Supplier will not submit to the BrowserStack any information that is controlled under the U.S. International Traffic in Arms Regulations.

16.0 ANTI-CORRUPTION

BrowserStack is committed to conducting its business free from extortion, bribery and all unlawful, unethical, or fraudulent activity. BrowserStack suppliers, business partners must not offer, give, promise, or authorize any bribe, gift, loan, fee, reward, or other advantage to any government official, government employee, customer, BrowserStack employee, or other person to obtain any business or improperly influence any action or decision. BrowserStack suppliers, business partners must comply and follow applicable international anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act 2010. Suppliers must comply, where applicable, with 31 U.S.C. 1352 (concerning payments

to influence federal transactions) or the Procurement Integrity Act (Subsection 27(a) of the Federal Procurement Policy Act, (42 U.S.C. 423) as amended by Section 814 of Public Law (101-189) to obtain information or to secure business for itself or others.