

# Samsara's Business Partner Code of Conduct

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# Introduction

Samsara is committed to acting in accordance with our mission and cultural principles. We believe that acting with the highest ethical standards is not only the right thing to do, but it also helps us achieve long-term success. Samsara strongly values its business partner, vendor and supplier relationships, and as a trusted Samsara service provider, you play a key role in allowing us to live up to our commitments to our customers, our employees and our communities.

We expect our business partners to exhibit a similar commitment to those highest ethical standards. This Business Partner Code of Conduct (hereinafter "Code") sets out Samsara's requirements that our business partners, suppliers, consultants and service providers, as well as their subsidiaries, affiliates, subcontractors and next-tier suppliers (hereinafter "Business Partners") (i) foster and facilitate Samsara's mission to increase safety, efficiency and sustainability of the operations that power our economy and (ii) align with Samsara's cultural values of customer impact, winning as a team, continuous improvement and building for the long term.

Samsara may request, and Business Partners shall promptly furnish to Samsara, a self-assessment as to their adherence to this Code. Business Partner compliance with this Code may be subject to audit by Samsara and Samsara may decide to take appropriate action where Business Partners no longer adhere to the letter and/or the spirit of this Code. If a situation arises during the course of our business relationship that might have an impact on your ability to provide us with a service that is consistent with our cultural values or this Code, please contact [bpcodofconduct@samsara.com](mailto:bpcodofconduct@samsara.com). Failure to meet the principles and standards set out in this Code may be cause for Samsara to terminate your relationship or agreement with us.





# 01

## Commitment to Ethics and Compliance

Samsara operates in strict compliance with applicable laws, rules and regulations, regardless of the type of service we are providing or where it is being delivered. To help ensure compliance, we maintain a robust ethics and compliance programme, the cornerstone of which is our internal Code of Conduct. As a condition of employment, all employees must certify to our internal Code of Conduct, along with other company policies.

This Code must be read in conjunction with applicable laws and relevant contractual arrangements. Business Partners must comply with all applicable laws, regulations and industry standards where each such Business Partner is located and conducts business. In addition, Business Partners must comply with applicable [United Nations Conventions](#) and have a duty to protect and safeguard confidential information and personal data and to take precautions before sharing with anyone. All Business Partners shall respect all intellectual property rights of Samsara and third parties.

If compliance with any provision of this Code would result in a legal or regulatory violation, Business Partners must follow the applicable law or regulation. Where the Code and a Business Partner agreement conflict, the Business Partner agreement prevails.

# 02

## Laws and Ethics

At Samsara, we are committed to upholding the highest standards of ethics, compliance, honesty and integrity and seek business relationships based on trust, transparency and mutual accountability. Business Partners must have an appropriate corporate governance programme that ensures they abide by the same values in their business operations, including through:

- **Gifts and business integrity** - This includes complying with the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act and other anti-bribery and anti-corruption laws, avoiding (perceived) conflicts of interest, allowing accurate and complete recordkeeping and disclosure practices, competing fairly and ethically with Samsara's business, protecting Samsara's reputation or property that is entrusted in them. Business Partners shall have policies relating to business with Samsara that prohibits the giving and acceptance of gifts (e.g. cash or cash equivalents, including entertainment, gift cards, product discounts and non-business activities) and a process to investigate and report any violations to said policies.
- **Protection of intellectual property** - Business Partners shall respect intellectual property rights and safeguard customer information. Business Partners shall manage technology and know-how in a manner that protects intellectual property rights.
- **Whistleblower protection and anonymous complaints** - Business Partners shall ensure that workers have an effective mechanism to report grievances and that facilitates open communication between management and workers. Business Partners shall also prevent and address any retaliation against employees who raise or report concerns in good faith and implement mechanisms to promptly and thoroughly investigate, consistent with applicable law, any such complaints.
- **Supply chain accountability** - Business Partners shall work with their own business partners to promote business conduct consistent with this Code and hold their subcontractors and agents to the standards and practices covered by this Code.
- **Insider trading** - As a Business Partner, you may be entrusted with information that has not yet been (or may never be) disclosed to the public. This information could affect our valuation or the stock price and/or valuation of other companies. Our ethical standards (and the law) strictly forbid you from acting on such information. This applies not only to you and your workers directly but also to family, friends or others who might be in a position to make investment decisions based on the information. If you have access to such information, you're expected to keep it confidential and to handle it with the utmost care and discretion.
- **Compliance with corporate criminal offence laws** - This includes complying with the UK Criminal Finances Act and other tax evasion laws and ensuring that your own employees, agents and business partners comply with such laws.



## 03

# State, Local and Education (SLED) Government Entities

Government entities entrust Samsara to protect their vital information. While we act with the highest degree of integrity with all of our customers, service to the government often comes with additional obligations, which as our trusted Business Partner, may be passed along to you. When providing services on behalf of Samsara to federal, state or local governments, you may be subject to specific requirements related to wages, hours, working conditions, pricing, gifting, lobbying, conflicts of interest or the proper handling of information. There may also be unique operational requirements or restrictions on which individuals are qualified (or permitted) to provide services. It is your responsibility to understand and adhere to the compliance commitments involved in servicing the government, whether they apply to you directly by law or through your contract with Samsara.

# 04

## Privacy, Confidentiality and Data Protection

Samsara holds data security and privacy to the highest standards and invests continuously in our infrastructure and processes to provide our customers with the most secure solutions in the industry, as further detailed on our [Commitment to Protecting Customer Privacy page](#). We are committed to being transparent about our privacy security practices. Samsara's world-class security programme centres on the concept of defence in depth: securing our organisation and our customers' data, at multiple layers.

When you handle information on our behalf – whether it is our employees or our customers' – we require that you keep it confidential, use it only for authorised purposes and apply the highest applicable levels of data protection.

As part of this commitment, you may be required to maintain and demonstrate effective physical, technical and administrative controls over the privacy and security of the data you are handling. Depending upon the services you are providing and the information you are handling on our behalf, you may also be required to implement additional appropriate safeguards.

# 05

## Labour, Employment and Human Rights

Samsara is committed to the protection of labour, employment and human rights, as further detailed notably in its [Modern Slavery Statement](#). Samsara respects the standards embodied in the International Labour Organisation (“ILO”) conventions and in the United Nations Universal Declaration of Human Rights (“UDHR”) and expects its Business Partners to act in accordance therewith.

Business Partners must act in accordance with the following guiding principles:

- **Freedom from discrimination, harassment and/or abuse** - both within their own organisation, and when interacting with outside parties, such as Samsara employees. Samsara promotes and expects its Business Partners to promote equal employment opportunity for all persons, without discrimination, harassment, abuse, corporal punishment or inhumane treatment, in strict accordance with applicable laws and regulations.
- **Freedom to choose employment** - Samsara expects its Business Partners to act in accordance with any and all applicable modern slavery regulations. Samsara will not tolerate involuntary or forced labour, or human trafficking.
- **Freedom from underage labour, protections for young and student workers** - Samsara does not tolerate the use of child labour. Business Partners are required to engage workers who are the minimum age to work in the country where work is performed.
- **Compliance with laws on wages and working hours** - Samsara requires all of its Business Partners to provide a living wage to its workers, allowing them to enjoy acceptable living conditions. Workers must not be required to work more than the maximum number of hours allowed by local laws and regulations. Any overtime must take place with the prior consent of the individual and must be compensated appropriately as established per local law.
- **Freedom of association and collective bargaining** - Business Partners shall freely allow workers’ lawful rights to associate with others, form and join (or refrain from joining) organisations of their own choosing, and bargain collectively, without interference, discrimination, retaliation or harassment. Workers must not be penalised or subjected to harassment or intimidation for the non-violent exercise of their right to form, join or refrain from joining such legal organisations.
- **Treat people with respect and dignity** - This includes standing with Samsara to prioritise the safety, wellbeing and dignity of all individuals whose talents and hard work help Samsara deliver best-in-class products and services.

Samsara will not knowingly support or conduct business with any Business Partners involved in any activities that go against the letter and/or the spirit of the principles listed above. Appropriate procedures must be in place with the Business Partner’s organisation and enforced to deal with any breaches of these aforementioned principles and standards.





## 06

# Diversity and Inclusion

Samsara is dedicated to building a diverse, equitable and inclusive workplace, and how we intend to do this is further detailed on Samsara's dedicated [Diversity webpage](#). Business Partners must align with this commitment.

Samsara also expects its Business Partners not to discriminate in screening, hiring or employment practices based notably on race, colour, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, veteran status or physical appearance. In addition, Samsara expects its Business Partners to demonstrate a commitment to identify, measure and improve a culture of diversity, equality and inclusion through all aspects of workplace management.

# 07

## Health and Safety

One of Samsara's core principles is to increase the safety of the operations that power our economy. Business Partners must act in accordance with the following guiding principles:

- **Comply with and manage occupational health and safety** - All Business Partners must provide and maintain a safe work environment and integrate reliable health and safety policies for conducting business. Their premises and facilities must comply with relevant legal and regulatory requirements, which includes obtaining any required permits, approvals, authorisations and certifications.
- **Be prepared for emergency situations** - Business Partners must ensure that their office and plant facilities have an appropriate emergency response plan in place.
- **Incident Management** - Business Partners shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track and manage such reports. Business Partners shall implement corrective action plans to mitigate risks, provide necessary medical treatment and facilitate workers' return to work.





## 08

# Environment

One of Samsara's core values is building for the long term and sustainability is a key part of that. As further detailed on Samsara's dedicated [Sustainability webpage](#), Samsara is committed to building best-in-class products that help its customers reduce their environmental footprint, and has the same goal for its own business practices. Business Partners must implement appropriate standards to protect the environment and to act in accordance with the following guiding principles:

- **Compliance with applicable environmental standards, regulations and laws** - Business Partners must be aware of and adhere to the laws relevant to the Business Partner's activities for the entire sourcing and production cycle: material sourcing – manufacturing – logistics – disposal. This includes obtaining any required permits and complying with any reporting requirements.
- **Waste mitigation and management** - Business Partners are expected to handle waste in a responsible way and maintain separate hazardous and non-hazardous waste management processes.
- **Efficient resourcing** - Business Partners are expected to take steps to understand their climate risks, to minimise their environmental impact and to implement policies to reduce greenhouse gas emissions. Business Partners are also expected to actively implement processes to reduce, reuse and recycle materials throughout their production/service cycles.
- **Responsible materials sourcing** - Business Partners should maintain policies reasonably ensuring that materials used to help build Samsara products do not directly or indirectly benefit armed groups or other illegal and/or harmful endeavours. This includes compliance with EU Conflict Minerals Regulation and Section 1502 of the Dodd-Frank Act, as amended.

# 09

## Business Partner Selection and Subcontracting

Business Partner evaluation and selection procedures include an assessment of Business Partner's business practices and corporate values, including the following reviews:

- **Business Partner Business Review** – Best-fit products and services to meet our needs.
- **Commercial Review** – Best value vs. expenditure.
- **Security Review** – Security architecture review.
- **Legal Review** – Terms and conditions review.
- **Financial Review** – Economic value and funding review.

Where appropriate, Samsara may invite Business Partners to participate in a competitive bidding process. Samsara expects Business Partners to agree to Samsara's standard contractual documentation but may elect in its sole discretion to adopt part or all of specific Business Partners' agreements.

If, per your contract with Samsara, you are permitted to delegate duties to subcontractors, you are expected (and may be required by law or contract) to perform similar levels of due diligence on them and to flow-down all appropriate legal and contractual obligations (including special provisions that may be required when providing services to government contractors, such as compliance with Section 889 of the U.S.'s 2019 National Defense Authorization Act). You are then responsible for monitoring and enforcing the compliance of your subcontractors with the obligations you pass along.





# 10

## Training and Enforcement

Our Business Partners must address the above areas through programmes that go beyond words on a page. They must have programmes that effectively train their workers on the relevant requirements and must enforce their policies and procedures through meaningful oversight.

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# No Creation of Third-Party Rights

This Code does not create new or additional rights on the part of third parties (or their beneficiaries), including Business Partners' employees. This Code supplements, but does not supersede, the rights and obligations established under contract between Samsara and the Business Partner.





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## Questions and Reporting

Should you have any questions about this Code please reach contact [bpcodeofconduct@samsara.com](mailto:bpcodeofconduct@samsara.com). If you believe that this Code, or the spirit of this Code, was violated by a Business Partner, you can submit a report anonymously to Samsara via our [whistleblower hotline](#).



samsara

Driving meaningful change in safety, sustainability and beyond with our customers is at the heart of our mission. How can we support your goals?

[SAMSARA.COM](https://www.samsara.com)

