



# Business Partner Code of Conduct

CONFLUENT.IO

**CONFLUENT IS COMMITTED** to acting ethically and in compliance with our legal, social, and environmental responsibilities and we expect our Business Partners to do the same. This Business Partner Code of Conduct outlines the standards and principles that must be followed by all third parties engaging in business with Confluent, including our vendors, suppliers, registered partners, resellers, distributors, contractors, subcontractors, consultants, and agents.

## 1. Anti-Corruption

Business Partners must uphold a zero-tolerance policy towards corruption, bribery, and unethical business practices, regardless of whether they are working with government officials or solely within the private sector. They must conduct their operations with honesty, transparency, and integrity, adhering to all applicable anti-corruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

- a. Business Partners must not offer, promise, pay, or authorize anything of value in relation to securing or maintaining business with clients, including Confluent's employees or representatives.
- b. Business Partners must accurately classify, record, and report all financial transactions, ensuring transparency and accountability in their business practices.
- c. Business Partners must implement a robust anti-corruption & anti-bribery compliance program in line with industry best practices that includes performing due diligence on all third parties they do business with and sufficient internal controls related to travel and hospitality, gift-giving, marketing expenditure, channel incentives, discount passthrough, and transparency to help prevent and detect any form of corruption or bribery within their organization.

## 2. Fair Competition

Confluent competes vigorously in all of its business activities, and we are committed to dealing fairly with our customers and competitors and conducting our global activities in accordance with all applicable laws, including competition laws. Business Partners must never propose or discuss any understanding or agreement with any competitor concerning:

- Costs, prices, discounts, or other terms or conditions of sale
- Profits or profit margins
- Allocation of product, customers, markets, or territories
- Limitations on production or supply
- Boycotts of customers or suppliers, or
- Bids or the intention to bid.

### 3. Conflicts of Interest

Business Partners must avoid activities that create or appear to create any conflicts of interest that could compromise their ability to act in the best interests of Confluent or our customers. This includes situations where personal relationships, financial interests, or other affiliations could influence decision-making or compromise the fair and transparent treatment.

- a. Business Partners must promptly disclose any potential conflicts of interest that may arise during their relationship with Confluent.
- b. Business Partners must not engage in any activity that may create a real or perceived conflict of interest, including accepting gifts, favors, or benefits that could compromise their impartiality.

### 4. Export Controls

U.S. and international trade laws control where and under what circumstances Confluent products and technologies may be exported. Business Partners must fully comply with all export controls and applicable laws and regulations.

### 5. Environmental, Health, and Safety Law

Business Partners are expected to minimize the environmental impact of their operations, promote workplace safety, and protect the health and well-being of their employees. As far as is reasonably practicable, Business Partners are also encouraged to carry out their operations, activities, and conduct with a commitment to ensuring a positive impact in the communities in which Business Partners operate.

- a. Business Partners should operate in an environmentally responsible manner, striving to conserve natural resources, minimize waste generation, and reduce pollution and its potential negative effect on biodiversity, climate change and water scarcity.
- b. Business Partners must maintain safe working conditions, providing employees with necessary training, protective equipment, and resources to ensure their well-being.
- c. Business Partners must comply with all applicable environmental, health, and safety regulations, permits, and licenses and strive to establish and meet standards which are higher than the standards imposed by law, when it is practicable and appropriate to do so.
- d. Business Partners should manage business generated waste, such as packaging materials, in accordance with the principles of reduction, re-use and recycling.

## 6. Confidentiality

Business Partners must respect the confidentiality and intellectual property rights of any proprietary or confidential information shared by Confluent, including information belonging to Confluent customers. Business Partners must ensure that appropriate safeguards are in place to protect such information from unauthorized access, use, or disclosure.

- a. Business Partners must only use confidential information for the purposes specified and authorized by the agreement or contract between the parties.
- b. Business Partners must implement reasonable measures to safeguard confidential information, including physical, technical, and organizational security controls.
- c. Business Partners should not disclose confidential information to any third party without prior written consent, except where required by applicable laws or regulations.

## 7. Data Privacy

Business Partners must handle personal data and sensitive information in compliance with applicable data protection laws. They should ensure the security and confidentiality of personal data collected, processed, or stored during the course of their business activities.

- a. Business Partners must obtain and process personal data only for the purposes specified and with appropriate consent.
- b. Business Partners must implement adequate technical and organizational measures to protect personal data from unauthorized access, loss, or disclosure.
- c. Business Partners must comply with applicable data privacy laws and regulations, including providing individuals with rights to access, rectify, and delete their personal data.

## 8. Insider Trading Laws

Business Partners may sometimes receive material, non-public information regarding Confluent and Confluent customers, vendors, suppliers, distributors or other companies engaged in business or contemplating a transaction with Confluent. Business Partners must (i) comply with all applicable U.S. and local insider trading and securities laws, (ii) not trade (buy, sell, or otherwise transact in) Confluent securities or those of any other company while in possession of material nonpublic information about Confluent or that company, and (iii) not engage in tipping or otherwise share material or inside information with other parties, or advise other parties to trade on such information.

## 9. Human Rights and Labor Standards

Confluent is committed to ensuring that our business operates in a socially responsible way that respects human rights. Business Partners must also be committed to playing their part in helping the world to improve labor practices. Therefore, Business Partners must not use or support any form of forced or involuntary labor, slavery, human trafficking, or child labor that violates the country's legal age for employment. Additionally, Business Partners must comply with applicable wage laws, as well as to provide legally mandated benefits. Business Partners should also respect local legislation with regards to working hours and the permission of freedom of association in accordance with applicable laws.

- a. Business Partners should maintain a work environment free of discrimination of all types, and from abusive, offensive, or harassing behavior, including victimization and bullying.
- b. Business Partners should strive to build a diverse workforce, making inclusiveness and equity part of the company culture.
- c. Business Partners must provide a safe working environment for their workers and make continuous efforts to mitigate risks of workplace hazards.
- d. Business Partners: (i) must not engage in or perpetuate slavery or human trafficking; (ii) must implement their own policies and controls to combat slavery and human trafficking; and (iii) must reasonably cooperate with an investigation led by Confluent or the relevant authority should Confluent receive a legitimate complaint or have a reasonable suspicion that the Business Partner may be engaged in violating this section and/or the [Confluent Modern Slavery Policy](#).

## 10. Working with Government Customers

Activities that may be permissible or appropriate with non-governmental entities may be improper, unethical, or even illegal when dealing with customers that are a part of (or are substantially owned, funded, managed, or controlled by) any government at any level (a "Government Customer"). Business Partners dealing with Government Customers or their contractors must therefore act with the highest degree of honesty and integrity, and must closely track and ensure they strictly comply with the unique laws, rules, regulations, and contract provisions that apply to dealings with Government Customers, including by implementing appropriate internal controls.

Business Partners and their employees must never:

- a. Offer anything of value (directly or indirectly) to a Government Customer, regardless of intent, in violation of government gifts/gratuities laws or regulations;
- b. Engage in any business practice (including offering or soliciting anything of value) in connection with a government contract or subcontract, where Partner is expected to render objective, impartial advice regarding Confluent's products or services, and such activity could create an appearance of impropriety or conflict of interest;
- c. Make any false or misleading statements or submit false claims (including false or inaccurate invoices, representations, or certifications);
- d. Use non-public, procurement-sensitive information from another source when not specifically authorized, or collude with other entities in a manner that is illegal, improper, or otherwise circumvents fair and open competition (e.g., bid rigging, price fixing, customer or market allocation, etc.)

Additionally, if Business Partner provides products or services to Confluent, Business Partner and Confluent shall abide by the requirements of 41 C.F.R §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national origin. Moreover, these regulations require that covered contractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, or disability.

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Confluent reserves the right to assess Business Partners' compliance with these principles and take appropriate actions, including termination of the partner relationship, in case of non-compliance. Confluent reserves the right to require Partner to provide certifications from its Business Partners attesting to compliance with this Business Partner Code of Conduct.

Business Partners are encouraged to report any suspected or confirmed breach of this Business Partner Code of Conduct by emailing [ethics@confluent.io](mailto:ethics@confluent.io) or through the EthicsPoint hotline at [www.confluent.ethicspoint.com](http://www.confluent.ethicspoint.com). Business Partners must not retaliate against anyone who, in good faith, reports a violation or suspected violation or who assists with the investigation of a potential violation.

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