INTRODUCTION

At BlackLine, we value the relationships we build with the people and companies who provide us with products and services (our “Vendors” or “you”), and we want to work with Vendors who share our values and support us in our commitment to serving our customers. This Vendor Code of Conduct (the “Vendor Code”) sets out the basic principles of how we conduct business, and the behaviors and practices we expect of our Vendors. BlackLine has made a name for itself by helping our customers modernize their accounting practices and achieve timely, accurate, and complete financial reporting. Given the nature of our business, it should come as no surprise that honesty, transparency, and accuracy are at the heart of our values as a company, and throughout the Vendor Code, you’ll see examples of how those values should be applied in your operations and in your dealings with BlackLine.

We understand that some aspects of this Vendor Code may be more relevant to you than others, depending on the nature and scale of your business, but regardless of who you are, what you do, or where you’re located, we insist on a fundamental commitment to understanding and complying with all laws and regulations that apply to your work.

We will continuously review and develop this Vendor Code to reflect changing standards and best practices, and any revisions will be posted on our website at www.blackline.com.

PROTECTING INFORMATION

BlackLine is serious about protecting its own confidential and proprietary information, as well as that of its customers, and we expect our Vendors to do the same. You should never disclose such information to anyone without our express written authorization. This includes all of the following:

- The terms and conditions of your agreement with us
- Our business, marketing and strategic plans
- Our intellectual property and technical information
- Personal information of our employees and contractors

Only people who need to know our confidential and proprietary information for the purpose for which we engaged you should have access to it, and such individuals may only use it for the purpose for which it is provided. Additionally, you must follow all applicable data privacy and information security laws and
regulations.

We also expect you to:

- Establish and maintain appropriate information security policies, procedures, and controls
- Provide regular information security and data protection training for all your staff
- Cooperate with our Information Security team in providing them with the information they need to adequately evaluate your policies, procedures, and controls

COMPETITION AND FAIR DEALING

At BlackLine, we compete on our merits without using unfair business practices, and we expect the same from you. Our Vendors must comply with applicable antitrust laws, and refrain from price fixing, bid rigging, territory splitting, and other tactics that unreasonably restrict competition. We also expect honesty in your dealings with us, and we do not tolerate misrepresentations of fact, or unfair advertising or promotional practices.

PRODUCT AND SERVICE QUALITY

BlackLine takes pride in the quality of the products and services we provide to our customers, and we cannot accomplish that without great products and services from our Vendors. We expect our Vendors to conduct due diligence before engaging third parties on our behalf, including employees, agents, consultants, and suppliers. We also expect that you will refrain from subcontracting work you are providing us without our written consent, and will ensure that all third parties you engage agree to abide by this Vendor Code or similar standards.

CONFLICTS OF INTEREST

BlackLine believes in avoiding even the appearance of conflicts of interest, and we insist on the same commitment to transparency from our Vendors. We require that you disclose all actual and potential conflicts of interest related to your activities as a Vendor. An example of a conflict of interest would be a situation where you obtain a business advantage as a result of your family or personal relationship with a BlackLine employee.

ANTI-CORRUPTION

At BlackLine, we understand that business courtesies are sometimes part of creating and maintaining a business relationship, but gifts and entertainment should never conflict with our values or applicable law.
For this reason, we require that if you give any business amenities to BlackLine employees, they must be modest, tasteful, and infrequent, and never offered during the vendor selection process, contract negotiations, or the contract renewal process.

Our expectations about preventing corruption extend beyond your interactions with BlackLine. You must follow all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, and you must not tolerate, permit, or engage in any form of corruption, extortion, or bribery, whether you are working with government or private sector individuals.

**INSIDER TRADING**

BlackLine is a publicly traded company, and in the course of your dealings with us, you and your employees may learn material, non-public information about our business. It is illegal to buy or sell our securities while in possession of such information, or to provide that information to others who might trade on it.

**BUSINESS AND FINANCIAL RECORDS**

As a leading provider of SaaS accounting software, accurate accounting and financial reporting is important to us. We require you to:

- Prepare and maintain accurate financial records for all matters related to your business with us
- Maintain appropriate internal controls and processes to ensure that your accounting and financial reporting is accurate and in reasonable detail, in compliance with applicable laws and regulations
- Provide us with an accurate accounting of your compliance with these standards upon our reasonable prior request

**LABOR AND EMPLOYMENT PRACTICES**

BlackLine believes in good corporate citizenship, starting with how we treat our own employees, and we expect the same standards from you. We believe that having diverse perspectives in our business has been important to our success, and we expect our Vendors to integrate diversity into their own supply processes and hiring. In particular, our Vendors must make all employment related decisions on the basis of skills and aptitude, never on legally protected personal characteristics.

BlackLine prohibits:

- Harassment or bullying in the workplace, including behavior that is sexual, coercive, threatening, abusive, or exploitative in nature
- Use of forced, bonded, or indentured labor, or involuntary prison labor
• Use of labor from children below the age set out in the International Labor Organization Core Conventions
• Requiring employees to hand over identity papers or deposits on starting work
• Failing to pay employees on time and in full for the work they have done

We also expect you to:

• Comply with all applicable workplace health and safety laws and regulations, and prevent workplace hazards
• Respect employees’ rights to freely associate and bargain collectively in accordance with applicable laws and regulations
• Compensate your employees fairly and follow local wage regulations and/or collective agreements
• Ensure that working hours do not exceed applicable legal limits
• Ensure fair hiring, firing, and evaluation processes

SUSTAINABILITY

At BlackLine, we strive to minimize our impact on the environment, and to preserve our natural resources for future generations. At a minimum, we require Vendors to comply with all applicable environmental laws and regulations, including requirements for waste management and disposal, recycling, and emissions. We encourage Vendors to share our commitment to reducing negative environmental impacts by setting and achieving sustainability goals relevant to their operations.

RAISING CONCERNS

We want to address legal and ethical concerns quickly and fairly, but we can’t fix what we don’t know about. We rely on you to let us know when you spot a violation of this Vendor Code or applicable law by telling your BlackLine contact, or if that method of communication is impossible or inappropriate, by using our third-party whistleblower hotline at blackline.ethicspoint.com. Our hotline allows for anonymous reporting where permitted by law.

We also expect you to have your own fair and effective internal reporting processes, and to share our commitment to not retaliate against people who make good faith reports of wrongdoing.

Thank you for taking the time to review this Vendor Code, and for your ongoing commitment to the values described in it.