coursera

Code of Business Conduct and Ethics

(as amended on October 28, 2026)



A message from Greg Hart



“Doing the right thing takes courage. Sometimes it means asking hard questions or speaking up when something doesn’t feel right.”

Team,

At Coursera, we’re part of something bigger than a business. We’re helping people and institutions around the world build the skills that will shape their future. That’s an incredible privilege and a real responsibility.

Why we care

Our global community of learners and stakeholders trust us not just for *what* we do but for *how* we do it – with integrity, fairness, and respect in every decision. This **Code of Business Conduct and Ethics** guides those decisions. It is not a list of rules; it’s a shared commitment to doing what’s right. It applies to all of us, everywhere we work, every day. Acting with honesty and respect builds trust, which in turn strengthens our culture and resilience as a company.

Speaking up is leadership

Doing the right thing takes courage. Sometimes it means asking hard questions or speaking up when something does not feel right. We’ve made sure there are safe, confidential ways to raise a concern, and retaliation has no place in our company. When in doubt, ask. If you see something wrong, say something. We’ll always stand behind anyone who raises a concern in good faith.

We all set the tone

Ethics isn’t the job of a single function or role – it’s on all of us. As CEO, I’m committed to leading by example. I expect every leader at Coursera to do the same, and for every team member to take personal ownership of living our values through action.

Thank you for everything you do to support our learners, customers, and each other.

Greg Hart
Chief Executive Officer, Coursera

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Introduction

Coursera expects everyone working with us to act lawfully, ethically, and with integrity. Our Code of Business Conduct and Ethics, or "*Code*", sets the standard for how we work. Although no document can address every decision we could face during our time with Coursera, this Code will help guide us. Coursera is a Delaware public benefit corporation and our mission guides our decisions, and this Code is one of the ways we hold ourselves accountable to it. In this Code, references to "*the Company*" or "*we*" mean Coursera, Inc. and its subsidiaries.

Our Code applies to everyone

This Code applies to all directors, officers, employees, contractors and consultants of the Company and its subsidiaries (collectively referred to as "*Company personnel*" or "*you*" in this Code). All Company personnel must conduct themselves in accordance with the principles set out in this Code, including any other applicable codes, policies, and procedures of the Company, and seek to avoid even the appearance of improper behavior. Anyone who violates this Code or refuses to cooperate with efforts to apply it may be subject to disciplinary action, up to and including termination.

Manager responsibilities

Managers have additional responsibilities under this Code. They should model ethical conduct, encourage questions, and foster an environment where people feel safe to speak up. We rely on our managers to act promptly on concerns and never to ignore or tolerate potential misconduct. Managers must never retaliate or tolerate retaliation against anyone for raising a concern in good faith or participating in an investigation.

Our commitment to integrity

This Code addresses our responsibilities to Coursera, to each other, and to our stakeholders. It applies globally, and covers a wide range of business practices and procedures. No code can cover every situation, or provide a complete list of unethical practices, so this Code sets out basic principles to guide all Company personnel. You are expected to exercise common sense and good judgment to avoid situations that could be perceived as unethical.

You are required to demonstrate your commitment to acting with integrity by:

- Acknowledging that you've read, understand, and agree to abide by the letter and spirit of the Code.
- Obtaining the required pre-approvals where policies specify, such as for certain gifts or hospitality.
- Asking for guidance when uncertain about a course of conduct.
- Speaking up if aware of potential violations of our Code, our policies, or applicable laws.
- Being forthcoming and cooperating fully in any internal investigations or inquiries.
- Completing all required training and attestations by the applicable deadlines.

In addition to this Code, you must follow all other Company codes, policies, and procedures that apply to your role. Where this Code refers to specific policies, you are expected to comply with those as well. Those who are designated as the Company's senior financial officers are also required to follow the Code of Ethics for Senior Financial Officers. In the event of any conflict between this Code and any other policy of the Company, the more stringent requirement shall apply. If local practice or custom appears to conflict with this Code, follow the standards set out in the Code and seek guidance from the Legal team.

Think before you act

- Is it legal and ethical?
- Is it consistent with this Code and any other applicable policy?
- Will it reflect well on me and Coursera?

If the answer to any of these questions is "no," choose a different course of action. Ask for guidance if you are unsure.



Where to get help

Questions. If you have any questions regarding this Code, you should address them to your manager, to the Legal team (legal-compliance@coursera.org) or to the Chief Legal Officer, Chief Financial Officer or Chief People Officer.

Speaking up

As part of our commitment to conducting business with integrity, we're expected to promptly speak up if we believe Coursera personnel or a Coursera supplier, vendor, or channel partner is engaging in misconduct. You don't need all the details to raise a concern — just a good-faith belief that something doesn't align with our integrity expectations. You can share concerns via the method that's most comfortable for you, by raising with:

- Your manager or another member of leadership.
- Your People business partner.
- Any member of the Legal team.
- The Legal & Compliance Team's ethics support email alias: legal-compliance@coursera.org.
- Coursera's Reporting Hotline (see the guidance on Nova).
- The Chief Legal Officer, Chief Financial Officer or Chief People Officer.
- The Chair of the Audit Committee, for concerns about accounting, internal accounting controls or auditing matters (see our Whistleblower Policy).

We do not tolerate retaliation against anyone who raises a concern in good faith or who participates in an investigation. Any retaliation is a violation of the Code and is subject to disciplinary action, up to and including termination.



REPORTING HOTLINE

24/7 Coursera's reporting hotline

Our hotline is a dedicated resource for raising integrity concerns. The hotline is available not only to our personnel, but also anyone globally who chooses to reach out. You can communicate via the hotline 24/7 by making a phone call or submitting information online. You can make submissions anonymously, where permitted by local law. All submissions are administered by a third-party vendor with multilingual services.

Once your submission is complete, a report is provided to the Legal Team for prompt assessment and appropriate follow-up. You can continue to communicate via the hotline platform while the information is being evaluated. See the guidance on **Nova** for more information.



Further guidance

This Code is not exhaustive. For ease of reference, we've highlighted the key **Related policies** under this Code, as well as other **Related resources**. Click on the titles listed in each section to access these resources. Details of the location and owner of these related policies and guidance are also provided.

KEY **Related policies** **Related resources**

If you cannot find a resource, contact the resource owner or the Legal team (legal-compliance@coursera.org). Please also notify the Legal team if you're aware of a policy or other resource to add to this Code.

Basic principles and practices

Compliance with laws, rules, and regulations

Company policy requires that our business activities comply with both the letter and the spirit of all applicable laws, rules, and regulations. Although not all Company personnel are expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers, or other appropriate personnel.

Confidentiality

Company personnel who come into possession of non-public confidential information regarding the Company or its business partners or other third parties must safeguard the information from the public and not intentionally or inadvertently communicate it to any person (including family members and friends) unless the person has a need to know the information for legitimate, Company-related reasons.

Confidential information can include a variety of materials and information regarding the ongoing operations and plans of the Company, and includes, but is not limited to, information that customers, partners, or vendors have provided to us. For example, confidential information can include product development plans, information regarding our relationships with major customers or suppliers, and information on the financial health and performance of the Company.

Company personnel with access to confidential information of the Company must keep it confidential at all times, both while working for the Company and after employment ends. You should maintain the confidentiality of such information except when disclosure is authorized or legally mandated, or until that information is released to the public. This duty of confidentiality can be relevant to, for example, the Company's competitive position, the privileged status of legal advice, and compliance with the securities laws applicable to the Company as a public company.

Except for disclosures required by law or protected reporting described in this Code (see Addressing concerns and violations), confidential Company information may be shared with third parties only where authorized, subject to an appropriate Company-approved nondisclosure agreement, and limited to those who need the information for a legitimate business purpose.

You may not use any confidential information other than for legitimate, Company-related reasons. You must also abide by any specific agreements, such as a Proprietary Information and Inventions Agreement and Company policies regarding confidentiality between you and the Company. Company personnel should therefore exercise caution not to disclose any confidential or proprietary information related to the Company or its partners on social media or other public forums, and not discuss such information in public places.

RELATED POLICY

Workplace Policies Guide (for your region)
Nova • People

RELATED RESOURCES

Safeguarding Confidential Information: Internal Communications Standards
Nova • Internal Communications

Best Practices for Safeguarding Coursera's Material Nonpublic Information
Nova • Legal and Compliance

Intellectual property

The Company's intellectual property—including its trademarks, logos, patents, copyrights, and trade secrets—is a valuable asset, and unauthorized use can diminish its value. Company personnel should be mindful of how the Company's intellectual property is used and protect it accordingly. Any public use of the Company's trademarks or logos by a third party must be approved in advance through the appropriate Company channels, and you should promptly report any suspected misuse of the Company's trademarks, logos, or other intellectual property to the Legal team (legal-compliance@coursera.org).

We also respect the intellectual property rights of others, including those of our customers, partners, and competitors. If you are developing a product or materials that use content you know or suspect may not belong to the Company, you must seek guidance from the Legal team before proceeding.

Moreover, we respect the confidential information of others. Company personnel must not seek out, accept, or use the confidential or proprietary information of a competitor or of a former employer, and must not bring such information into the Company or use it in the course of their work. If you come into possession of a competitor's confidential information, whether intentionally or inadvertently, you should not review, share, or use it, and must contact the Legal team (legal-compliance@coursera.org) without delay.

Privacy and personal data

We respect the privacy of individuals and the personal data entrusted to us. Company personnel must only collect, use, share, or retain personal data for legitimate business purposes, and always in compliance with applicable data protection laws and Company policies. Access to personal data must be limited to those who need it for their role, and it must be securely stored and disposed of when no longer needed, using only Company-approved systems. Do not transfer personal data to unauthorized systems, including personal devices or cloud storage. Swift action can often mitigate damage from inadvertent disclosure of personal data, so if you become aware of a potential breach, contact Legal without delay.

RELATED RESOURCES

Privacy Reviews
Nova • Legal and Compliance

Personal Information FAQs
Nova • Legal and Compliance

Generative artificial intelligence

We believe that embracing innovative technologies, like generative artificial intelligence ("*GenAI*"), is an essential part of achieving our corporate mission. Although we recognize the potential of these technologies, we must use these tools thoughtfully, responsibly, and in alignment with our values. You must ensure that your use of GenAI complies with all applicable Company policies.

RELATED POLICY

Internal Generative AI Use Policy
Nova • Legal and Compliance

Conflicts of interest

A "*conflict of interest*" occurs when an individual's private interest interferes in any way — or even appears to interfere — with the interests of the Company as a whole. For example, conflicts of interest can arise when:

- A person's loyalties or actions are divided between the interests of the Company and those of another, such as a competitor, supplier, customer, or personal business.
- Company personnel take actions or have interests that may make it difficult to perform their work for the Company objectively and effectively.
- A person receives an improper personal benefit because of that person's position in, or relationship with, the Company.
- Confidential information is used or shared for personal benefit.

A conflict of interest may not always be clear. For example, it could be your relative, or someone with whom you have a close personal relationship, who has a connection with a competitor, customer, supplier or other party that gives rise to the conflict. The appearance of a conflict of interest alone can adversely affect the Company and its relations with customers, suppliers, employees, and others.

You must disclose any situation in which you are involved, or plan to become involved, which could result in an actual, potential, or apparent conflict of interest. Notify the People team through the online form linked below. Directors and executive officers should instead disclose actual or potential conflicts to the Chief Legal Officer, who will refer them to the Board or its designated committee. You should consult with your manager or the People team and abstain from making any decisions that might be affected by the conflict until the matter has been reviewed.

Company personnel are expected to use good judgment, uphold high ethical standards, and avoid situations that create an actual or potential conflict of interest. The Company may take any action that it deems appropriate to avoid or remedy an actual, prospective, or perceived conflict of interest, including a reassignment of some or all your duties or change of your position.

Any Company personnel who become aware of a conflict or a potential conflict should bring it to the attention of their manager or the People team, who in turn must disclose it to the Chief Legal Officer, Chief Financial Officer or Chief People Officer.

RELATED POLICIES

Workplace Policies Guide (for your region)
Nova • People

Related Persons Transactions Policy: Coursera Directors and Officers only
Nova • Legal and Compliance

RELATED RESOURCE

Outside Business Activity Request Form
Google Forms • People

Corporate opportunities

You must not take for yourself personal opportunities that are discovered through using Company property or confidential information or your position with the Company without the consent of the Chief Legal Officer, Chief Financial Officer or Chief People Officer, or the Board of Directors (the "*Board*") or its designees, as applicable. No Company personnel may use corporate property, information, or their position for improper personal gain, or compete with the Company directly or indirectly while they are employed by the Company. You owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises.

RELATED POLICY

Workplace Policies Guide (for your region)
Nova • People

Fair dealing

Although the prosperity of our Company depends on our ability to outperform our competitors, the Company is committed to achieving success by fair and ethical means. We seek to maintain a reputation for honesty and fair dealing among our competitors and the public alike. Dishonest, unethical, or illegal business practices are prohibited, including, without limitation, anti-competitive conduct, corruption, bribery, kickbacks, extortion, embezzlement, or other similar practices. An exhaustive list of unethical practices cannot be provided. Instead, the Company relies on the judgment of each individual to avoid such practices.

You must also comply with all competition and antitrust laws. Prohibited conduct includes price-fixing, market allocation, bid-rigging, and dictating channel pricing. Do not gather competitive intelligence through unethical means. If unsure, seek Legal's guidance before proceeding. Furthermore, each Company personnel should endeavor to deal fairly with the Company's customers, suppliers, competitors, and personnel. No Company personnel should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair business practice.

RELATED POLICIES

Gift Giving, Global Anti-Bribery, and Anti-Corruption Practices
Nova • Legal and Compliance

Global Anti-Corruption Policy
Google Docs • Legal and Compliance

Working with governments

Laws and rules governing public sector interactions are often stricter than those for private companies; always exercise extra care when dealing with government officials. Company personnel must follow applicable laws and procedures in interactions with government officials. This includes obtaining the Legal team's review of any government contracts and directing any regulatory inquiries to Legal. Actions that could imply undue influence in government dealings are strictly prohibited, including improper payments or amenities. Always adhere to anti-bribery laws, and seek Legal's advice in uncertain situations. Coursera adheres to all laws on political interactions, and prohibits the use of its resources, including funds and personnel time, for political campaigns or activities without explicit written authorization from the Chief Legal Officer.

RELATED POLICIES

Gift Giving, Global Anti-Bribery, and Anti-Corruption Practices
Nova • Legal and Compliance

Global Anti-Corruption Policy
Google Docs • Legal and Compliance

RELATED RESOURCES

Government Relations
Nova • Legal and Compliance

Guidance for Working with Government Parties
Google Docs • Legal and Compliance



Payments or gifts from others

Coursera prohibits offering, accepting, or soliciting anything of value to improperly influence business decisions, acts, or failures to act. Gifts or hospitality must be modest, reasonable, infrequent, and should always be appropriate to the circumstances; that is, they should never be of a kind that could create an appearance of impropriety. Cash gifts are never permitted, and cash equivalents are generally prohibited with some narrow exceptions. Certain gifts or entertainment may require pre-approval, particularly where public officials, such as public university faculty or government staff, are involved. Always record gifts and hospitality accurately in the Company's books and records and obtain any required pre-approvals before offering or accepting them. You are expected to follow the more extensive guidance, such as the applicable monetary caps and pre-approval requirements that are set out in the Company's Global Anti-Corruption Policy.

RELATED POLICIES

Gift Giving, Global Anti-Bribery, and Anti-Corruption Practices
Nova • Legal and Compliance

Global Anti-Corruption Policy
Google Docs • Legal and Compliance

Third-party risk (suppliers, partners, agents)

Coursera engages third parties only for legitimate business purposes and in accordance with our procurement and compliance policies. Before engaging a third party, complete appropriate diligence, which may include diligence regarding privacy, information security, credit, and compliance risk. Where applicable, third parties such as our suppliers, vendors, and channel partners must agree to follow our Code of Conduct for Suppliers and Third-Party Intermediaries. Promptly report any concerns about third-party conduct to the Legal team.

RELATED RESOURCE

Code of Conduct for Suppliers and Third-Party Intermediaries
Nova • Legal and Compliance

Discrimination, harassment and respect

We do not tolerate unlawful discrimination or harassment and we expect all Company personnel to treat each other and others they interact with in their service to the Company with respect and dignity. This includes protection against discrimination based on gender identity or expression, sexual orientation, and other characteristics protected by law.

RELATED POLICY

Workplace Policies Guide (for your region)
Nova • People

Health and safety

Coursera strives to maintain a safe and respectful working environment. Threats, violence, harassment, or working while impaired have no place in our community. Everyone shares responsibility for maintaining a safe and healthy workplace by following the rules, policies, and practices that apply in our offices and other shared workspaces, both in person and online. Report any unsafe equipment, practices, or conditions to the facilities manager of the relevant workspace, escalating to your manager, the People team or Legal if necessary.

RELATED POLICY

Workplace Policies Guide (for your region)
Nova • People

Human rights

We uphold internationally recognized human rights. We are committed to ensuring our operations, and those of our suppliers and partners, are free from human trafficking, forced labor, and child labor. We expect everyone we work with to conduct business ethically and in a manner consistent with global human rights standards.

RELATED RESOURCES

- **Modern Slavery Statement**
  coursera.org • Legal and Compliance
- **Code of Conduct for Suppliers and Third-Party Intermediaries**
  Nova • Legal and Compliance

Environmental and social impact

Coursera is committed to acting responsibly toward the environment and the communities where we live and work. As a public benefit corporation, we consider the effect of our decisions on learners, our people, communities and the environment. We encourage initiatives that reduce our environmental footprint and create positive social impact through our work.

RELATED RESOURCES

- **Impact Report**
  coursera.org • Sustainability
- **Code of Conduct for Suppliers and Third-Party Intermediaries**
  Nova • Legal and Compliance

Insider trading

You are not permitted to use, share, or disseminate confidential information for stock trading purposes or for any other purpose except the conduct of our business. To use material nonpublic information for personal financial benefit, or to "tip" others who might make an investment decision based on this information, is not only unethical but is also illegal.

RELATED POLICY

- **Insider Trading Policy**
  Nova • Legal and Compliance

RELATED RESOURCE

- **Best Practices for Safeguarding Coursera's Material Nonpublic Information**
  Nova • Legal and Compliance

Global trade controls and sanctions

Coursera personnel must comply with applicable trade and sanctions laws and restrictions on doing business with certain countries, regions, and entities. You must not facilitate any circumvention or diversion of these restrictions. If you are uncertain whether the rules apply, do not proceed with any transaction or engagement and seek the Legal team's assistance.

RELATED POLICY

- **Doing Business Globally**
  Nova • Legal and Compliance

Protection and proper use of company assets

No secret or unrecorded fund of Company assets or cash shall be established or maintained for any purpose. Anyone spending or obligating Company funds should be certain that the transaction is properly and appropriately documented and that the Company receives appropriate value in return. Only authorized personnel may commit the Company to contractual obligations, consistent with our Signature and Spending Authority Policy.

All Company personnel should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. Immediately report any suspected incident of fraud or theft to the Chief Legal Officer, Chief Financial Officer, or Chief People Officer for investigation. Company equipment should not be used for non-Company business, though incidental personal use may be permitted.

RELATED POLICIES

Signature and Spending Authority Policy
Nova • Finance

Procurement Policy
Nova • Finance

Workplace Policies Guide (for your region)
Nova • People



Record keeping

The Company requires honest and accurate recording and reporting of information to make responsible business decisions. If you use a business expense account, document and record all reimbursable expenses accurately. If you are not sure whether an expense is appropriate, ask your manager.

All Company books, records, accounts, and financial statements must be maintained in reasonable detail and must appropriately reflect the Company's transactions. They must also conform both to applicable legal requirements and to the Company's system of internal controls. Side agreements, informal commitments, or back-dated documents are prohibited. All Company data, records, and reports must be prepared truthfully and accurately. All agreements and records must accurately reflect the true terms and timing of each transaction. The Company's records must be maintained for the periods specified in the Company's applicable record retention policies.

Company personnel who contribute to or prepare the Company's financial statements, public filings, submissions, or communications should do so in accordance with the following guidelines:

- All accounting records, as well as reports produced from those records, must be prepared in accordance with the laws of each applicable jurisdiction.
- All records must fairly and accurately reflect the transactions or occurrences to which they relate.
- All records must fairly and accurately reflect, in reasonable detail, the Company's assets, liabilities, revenues, and expenses.
- The Company's accounting records must not contain any false or intentionally misleading entries.
- No transactions should be intentionally misclassified as to accounts, departments, or accounting periods.
- All transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period.
- No information should be concealed from independent auditors.
- Compliance with the Company's system of internal accounting controls is required.
- All team members must cooperate fully, honestly, and in good faith with all relevant internal departments, as well as our independent auditors and counsel, to help ensure that our books and records, and our SEC and other regulatory reporting and disclosure, is accurate and complete.

Our public disclosures must be full, fair, accurate, timely, and understandable. Company records and communications often become public, and Company personnel should avoid exaggeration, disparaging remarks, guesswork, inappropriate characterizations of people or companies, or any other language that could be misunderstood. This applies equally to all records, including e-mail, internal memos and formal reports.

If you suspect or observe any irregularities relating to our recordkeeping or any other financial or accounting matter, no matter how small, immediately report them to your manager, or pursuant to the procedures in our whistleblower policy. If serious enough, such irregularities may be submitted to the Audit Committee of the Company's Board of Directors for further review.

RELATED POLICIES

Employee Expenses Policies
Nova • Finance

Signature and Spending Authority Policy
Nova • Finance

Procurement Policy
Nova • Finance

Global Anti-Corruption Policy
Google Docs • Legal and Compliance

Workplace Policies Guide (for your region)
Nova • People

Complaint Procedures for Accounting and Auditing Matters
Google Docs • Legal and Compliance

Communications with the media, securities analysts and stockholders

Communications on behalf of the Company with the media, securities analysts and our stockholders must be made only by specifically authorized spokespersons of the Company. Refer media inquiries to the Head of Public Relations and Communications, and securities analyst or stockholder inquiries to the Head of Investor Relations or, in their absence, another authorized spokesperson.

Only authorized spokespersons and departments may use official company social media channels to speak on behalf of the Company. When posting on personal social media, make clear that your views are your own and do not speak on behalf of Coursera. Do not disparage competitors or partners.

RELATED POLICIES

External Communications and Social Media Policy
Nova • Public Relations

Regulation Fair Disclosure Compliance Policy
Nova • Legal and Compliance



Further resources

Company policies

This Code sets out the principles that guide how we work. It is supported by additional Company policies and procedures that provide more detailed guidance on specific areas such as anti-corruption and insider trading. These and other relevant resources are available on Nova. You are expected to review and comply with the policies and guidance that apply to your role.

Addressing concerns and violations

The ways to raise a concern or ask a question are set out in the Where to get help section of this Code. Nothing in this Code should discourage you from reporting any illegal activity. If you become aware of illegal activity, unethical conduct, or a possible Code violation, you must report it promptly. Failure to report known misconduct is a violation of this Code.

Concerns raised under this Code will be reviewed promptly and fairly. Where necessary, the Company will investigate and take appropriate action. If you are asked by the Company to take part in an internal investigation, you must fully and honestly cooperate with their requests. Knowingly providing false or misleading information in a report or during an investigation is a violation of the Code.

Coursera will not tolerate retaliation against anyone who raises a concern or participates in an investigation in good faith, even if the concern is not ultimately substantiated. Any form of retaliation is a violation of this Code. If you report misconduct you were involved in, you may still be disciplined for your own conduct, but your prompt reporting may be considered a mitigating factor.

Violating this Code, or failing to follow instructions designed to enforce it, may lead to disciplinary action, up to and including termination of employment or termination of service relationships. Legal action may also follow where appropriate.

Nothing in this Code should discourage you from reporting any illegal activity to the appropriate regulatory authority, and this Code should not be construed as prohibiting you from testifying, participating, or otherwise assisting in any national, state, or local administrative, judicial, or legislative proceeding or investigation. You do not need the Company's permission, or to notify the Company, before communicating with any government or regulatory agency (including the SEC), and nothing in this Code prohibits you from doing so.

Accountability for adherence to the Code

The Board will designate the appropriate persons to determine appropriate actions in the event of Code violations. The individual involved will receive a notice if it has determined that there has been a violation. Violations may lead to censure by the Board or its designee, demotion or re-assignment of the individual involved, suspension with or without pay (as determined by the Board or its designee), and termination of the individual's employment or other service.

Approval, amendments and waiver

This Code was reviewed by the Chief Legal Officer and approved by the Coursera Board of Directors. Any substantive amendments to the Code must also be approved by the Board.

Any waiver of this Code or the Code of Ethics for Senior Financial Officers for executive officers (including, where required by law, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions)) or directors must be authorized by the Board or, to the extent permitted by NYSE rules, a committee of the Board. Any such waiver will be disclosed as required by law and stock-exchange rules.

No rights created

This Code is a statement of fundamental principles, policies, and procedures that govern Company personnel in the conduct of Coursera business. It does not alter existing legal rights and obligations, including "at will" employment arrangements or other agreements, nor does it create rights for any customer, supplier, stockholder, or other third party.