Code of Conduct for Suppliers and Third-Party Intermediaries

What is the Code about?

This Code of Conduct (**Code**) is the minimum standard that Coursera expects from its Suppliers concerning their social, environmental, and ethical responsibilities. This code is not exhaustive; Suppliers are required to use their own discretion to ensure compliance with unaddressed topics.

Who does the Code apply to?

The Code applies to our Suppliers (see the Glossary). The Code does not apply to the university, industry, government & enterprise partners that provide content to our platform, but they are invited to follow the Code voluntarily.

Glossary

Employee	All current and former workers of the Supplier.
Supplier	An institution, including their subcontractors, who acts for or on behalf of Coursera and/or that provides goods or services to Coursera, including third-party intermediaries.
Coursera	Coursera, Inc. and its subsidiaries and affiliates.
Applicable laws	All applicable local, state, federal, and international laws and regulations, including but not limited to labor and employment, health and safety, and environmental laws and regulations.

Your commitment

As a Supplier of Coursera, you agree to:

Our standards

Legal compliance	● comply with all applicable laws.
Ethics	● be ethical in all aspects of your business, practices, operations, and relationships.

Our society

Forced labor	● ensure that all work is on a voluntary basis. ● not use, or tolerate the use of, any illegal form of forced labor.

Child labor	● only use employees that are of at least legal working age under applicable laws or, where applicable law does not set a minimum age, at least 18 years of age for hazardous work and 15 years of age for all other work.
Discrimination	● promote a culture of diversity, equity and inclusion. ● not engage in or tolerate any harassment, abuse, discrimination or other illegal conduct towards any person on any basis.
Employee conditions	● follow all general workplace standards and ensure safe working conditions that are respectful of fundamental human rights. ● pay employees in accordance with applicable wage laws, including minimum wages, overtime hours and mandated benefits. ● comply with all applicable laws regarding working hours, break periods, and overtime hours. ● recognize, respect, and protect employees' lawful rights to freely associate and collectively bargain in accordance with applicable laws and without fear of retaliation. ● comply with applicable immigration laws and only employ those with a legal right to work in the relevant location.
Health & safety and business continuity	● comply with all applicable safety and health laws. ● provide a healthy, sanitary and safe working environment and training in health & safety issues. ● identify, evaluate, and manage occupational health and safety hazards, risks and incidents. ● identify and plan for potential emergencies, implement and test emergency plans and preventative methods, and provide guidance to workers on emergency response procedures, including in response to an infectious disease outbreak.

Our environment

Ecosystem degradation	● follow all applicable laws regarding environmental practices.
Sustainability	● use reasonable efforts to enhance environmental performance, reduce waste and harmful emissions, and reduce consumption of resources, including raw materials, energy and water.
Permits and reporting	● obtain and maintain all required environmental permits, and comply with the reporting requirements of such permits and all applicable laws.
Waste & hazardous materials	● comply with all applicable waste management laws. ● monitor, treat, control, manage, and properly dispose of wastewater and solid waste. ● create and maintain systems to ensure the safe handling, movement, storage, disposal, and management of hazardous materials.

Your business

Business integrity	- be in full compliance with all applicable anti-corruption laws. - not directly or indirectly facilitate money laundering or terrorism financing. - never engage in any kind of bribery, corruption, embezzlement, extortion or other corrupt practice, including kickbacks and facilitation payments. - never promise, offer, provide, or authorize anything of value to a government official or political entity to gain an improper business advantage. - not offer or accept anything of value from business partners to obtain improper business advantages, and ensure any gifts or entertainment comply with applicable laws and Coursera's policies. "Gifts and entertainment" includes anything of value, such as loans, prizes, meals, tickets, or gift certificates.
Fair business practices	conduct your business in full compliance with all applicable fair competition and antitrust laws, and all applicable export control and customs regulations.
Intellectual property and personal data	take all commercially reasonable efforts and necessary precautions to safeguard and protect intellectual property rights, including processes, information, technology, customer information, and personal data.
Conflicts of interest	- not engage in any activities that would create an apparent, actual or potential conflict of interest regarding your duties, interests, and obligations to Coursera. - to immediately notify Coursera if any conflict of interest arises.
Accuracy of business records	- maintain up-to-date business and financial books, records, and statements to demonstrate compliance with applicable laws. - accurately record and disclose information regarding its business activities, without falsification or misrepresentation, to all appropriate parties and as required by law.
Insider trading	not purchase, sell, or trade Coursera's securities if you are in possession or are aware of material non-public information about Coursera. "Material non-public information" is information which is not available to the general public and which could influence an investor to buy, sell, or hold securities.

Your governance

Verification	maintain documentation to verify compliance with the Code and applicable laws.
Risk assessment and management	develop and maintain processes that identify risks in all areas addressed in this Code; assess the significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.
Performance objectives	develop and outline performance objectives and implementation plans, including assessments of performance against those specified objectives.
Supply chain	- use reasonable efforts to educate and train your employees and suppliers, and ensure they are broadly in compliance with the requirements of this Code. - where you are permitted to subcontract to a third party your obligations to Coursera,

	inform Coursera of all subcontractors that you appoint.
Audits and inspection	● reasonably cooperate with audit requests by Coursera to ensure compliance with the standards in this Code. ● reasonably cooperate with and provide information requested in relation to Coursera's reporting obligations, including without limitation its scope 3 emissions reporting obligations.
Speaking up	● create and maintain an anonymous complaint system for the reporting of workplace complaints, protect whistleblower confidentiality and prohibit retaliation.

Consequence of non-compliance

Part of conducting business with Coursera includes compliance with this Code of Conduct.

If it is determined a Supplier does not adhere to the Code, they must correct their actions to ensure compliance with the requirements outlined in this document.

Reporting concerns

Coursera is committed to supporting learners, customers, business partners (including its suppliers, agents and intermediaries), and employees with ethical practices in the workplace. In partnership with Lighthouse Reporting Hotline Services, Coursera provides an anonymous reporting procedure for any and all serious issues related to unethical business practices. Visit lighthouse-services.com/coursera and follow the instructions to either report an incident or view existing reports that you've submitted.

Version history

Date	Version No.	Description
17 Nov 2022	1	Original published version