

# Third Party Code of Conduct

**At Cloudflare, we have an ambitious goal — to help build a better Internet. We believe our talented team, powerful network, and engaged users can solve some of the Internet’s biggest problems.**

**Cloudflare is committed to the highest standards of ethics and integrity in everything we do, including in our operations and supply chain. This Third Party Code of Conduct (“Code”) outlines Cloudflare’s requirements and expectations regarding its suppliers, resellers and other partners (“Third Parties”). All of our Third Parties are required to acknowledge and accept the terms of this Code.**

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## Human Rights

We believe a better Internet is built on human rights, and that human rights should inform how we do business. Cloudflare is committed to respecting human rights under the [United Nations Guiding Principles on Business and Human Rights](#) (UNGP). The strength of international human rights is that they apply equally to all people, everywhere.

Third Parties are required to respect human rights by avoiding causing human rights harms, and by mitigating and remediating any harms that do occur. Cloudflare strongly encourages all Third Parties to publicly commit to the UNGPs, and to periodically report on their implementation.

For more information on Cloudflare’s commitment to human rights, see our [Human Rights Policy](#).

# Labor

## Freedom of Association and Collective Bargaining

Cloudflare is committed to the [ILO Declaration on Fundamental Principles and Rights at Work](#).

Third Parties should respect and protect the rights of workers to seek representation, associate freely, and join or not join collective bargaining organizations (such as labor unions and workers' councils) in accordance with local laws as well as international human rights.

## Occupational Health and Safety

Third Parties should have procedures in place to minimize potential safety hazards, including but not limited to protections from chemical, biological, or physical agents. Personal protective equipment should be provided when appropriate. Workers should not be disciplined for raising safety concerns. Third Parties should comply with all applicable quality, health, safety, and environmental regulations. All required permits, licenses and registrations should be obtained, maintained and kept up-to-date. Third Parties should fulfill their operational and reporting requirements.

Procedures and systems to prevent, manage, track, and report occupational injury and illness, as required by law or Cloudflare, should be in place. Third Parties should report all incidents at work and provide access to necessary medical treatment to employees.

## Child Labor

Third Parties are required to prohibit child labor consistent with the [ILO Declaration on Fundamental Principles and Rights at Work](#) in their operations and among their Third Parties. Third Parties are strongly encouraged to participate in industry efforts aimed at the elimination of child labor generally.

## Forced Labor and Human Trafficking

Third Parties are required to prohibit forced or compulsory labor consistent with the [ILO Declaration on Fundamental Principles and Rights at Work](#). Third Parties are strongly encouraged to participate in industry efforts aimed at the elimination of forced labor and human trafficking.

For more information on Cloudflare's commitment to prohibition of forced labor and human trafficking, see our [Modern Slavery Act Statement](#).

## Discrimination and Harassment

We believe all employees have a right to work in an environment free from discrimination and harassment as specified by with [The Ten Principles of the UN Global Compact](#). Third Parties are required to have clear anti-harassment and discrimination policies in place which are respected and enforced appropriately. All personnel are expected to be treated with dignity and respect.

## Diversity, Equity, and Inclusivity

Third Parties are required to adopt policies and procedures that facilitate diverse, equitable, and inclusive work environments for all. Third Parties are strongly encouraged to report public accounting of these initiatives.

For more information on Cloudflare's diversity, equity, and inclusivity efforts, see Cloudflare's Diversity webpage.

# Governance

## Anti-Bribery and Anti-Corruption

Third Parties may not offer, give, promise, or authorize any bribe, gift, loan, fee, reward, or other advantage to a government official, employee, partner, customer, or any other person to improperly influence any action or decision. Further, Third Parties must comply with all relevant anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act.

## Trade Compliance

Cloudflare is committed to conducting our business activities in full compliance with the applicable import and export laws and regulations of the United States, all countries in which Third Parties are operating, and any other applicable laws. Third Parties must ensure that products, services and shipments adhere to all applicable international trade compliance laws, rules and regulations. Third Parties are expected to incorporate international Supply Chain Security (SCS) measures into their business processes as described by the [World Customs Organization's SAFE Framework](#) or similar SCS guidelines.

Cloudflare does not work with Third Parties subject to sanctions laws including but not limited to US, EU, and UK sanctions. Our Third Parties warrant that they are not owned (directly or indirectly) or controlled by a person or entity subject to sanctions laws.

## Anti-Competitive Behavior

Third Parties may not take any action in combination with other companies that may restrain competition, particularly in market segments in which a company or companies has a particularly strong position. Further, Third Parties should comply with laws governing fair competition in all activities, and promote compliance throughout its supply chain.

## Conflicts of Interest

Third Parties must be free to act with total objectivity in their business dealings with Cloudflare, and thus must avoid conflicts of interest. If a

potential or actual conflict of interest arises that interferes with a Third Party's ability to act objectively on behalf of Cloudflare, the Third Party must report all relevant details to Cloudflare.

## Data Privacy

Third Parties are required to comply with applicable data protection laws. Third parties will ensure that all such safeguards — including the manner in which Cloudflare personal data is processed, used, disposed of and disclosed — comply with applicable law, including without limitation all data protection laws. Third Parties will not use any personal data processed for secondary purposes beyond the services for which Third Parties have been contracted.

## Data Security

Third Parties are expected to implement administrative, physical, and technical safeguards consistent with information security best practices and industry standards. Third Parties accessing Cloudflare systems must follow Cloudflare security policies and use resources provided by Cloudflare (e.g., laptop, security key, email address). Third Parties are required to complete successful background checks on their employees.

## Government Contracting

Cloudflare is a government contractor. As such, we comply with all applicable laws and regulations, including Federal Acquisition Regulations (FARs). Some of these obligations will flow down and apply to our Third Parties.

Under Section 889 of the National Defense Authorization Act (NDAA), Cloudflare does not use, or otherwise permit in its supply chain, telecommunications equipment, video surveillance products, or services produced or provided by Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of those entities).

# Environmental Sustainability

## Greenhouse Gas Emissions

Cloudflare is a signatory of the UN Global Compact, and is committed to developing environmentally friendly technologies. Third Parties are required to identify, manage, and report Greenhouse Gas (GHG) emissions as specified by the [GHG Protocol](#) or other well-established reporting methodologies — or to commit to working toward those objectives. Third Parties are strongly encouraged to set goals to reduce their overall GHG emissions footprint; support renewable energy; and offset, remove, or mitigate any residual emissions.

## Responsible Sourcing of Materials

Third Parties are required to commit to responsible sourcing of materials and to exercise due diligence when obtaining materials likely to originate in areas at high risk for human rights violations, environmental degradation, child or compulsory labor, or any other issue covered under this Code.

# Compliance

Third Parties are required to notify Cloudflare promptly of any violation of the Code. Cloudflare reserves the right to conduct a reasonable audit or inspection of any Third Party's facilities or operations regarding any Third Party claim associated with this Code, or resulting from credible evidence of non-compliance.

Reports of non-compliance can be made via Cloudflare's Helpline [online](#) or by phone (international calling numbers provided on the [website](#)), which allows for anonymous reporting in certain jurisdictions as permitted by local law. Cloudflare will do its best to keep all reports as confidential as possible in a manner consistent with conducting a fair and proper investigation, and in compliance with applicable law. All good-faith reports are protected by our Policy Against Retaliation.

Third Parties must immediately report any actual or suspected security incident to Cloudflare's SIRT Team via email.

Any Third Party found in violation of the Code, that upon reasonable notice fails to take corrective action, may jeopardize that Third Party's business relationship with Cloudflare, up to and including termination.