

# Anaplan Limited

## Slavery and Human Trafficking Statement

### 1. Financial year

1.1 This slavery and human trafficking statement relates to the company's financial year beginning 1 February 2022 and ending 31 January 2023.

### 2. Introduction

2.1 We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our supply chains and in our business.

2.2 It is our policy to conduct all business ethically and in accordance with the UK Government's Modern Slavery Strategy, as amended from time to time, and as outlined in the UK Home Office Guidance "Transparency in Supply Chains: a Practical Guide".

2.3 We are committed to acting ethically in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter modern slavery and human trafficking.

2.4 Our holding company, Anaplan Inc. has developed a Code of Conduct and Ethics which applies across the Anaplan group of companies of which we are part. This Code of Conduct and Ethics and our company values represent the standards by which we all must operate. All employees of Anaplan, Inc. or any subsidiary of Anaplan, Inc. (collectively, "Anaplan"), as well as Anaplan's officers and Board members, must abide by this Code of Conduct and Ethics. We also expect Anaplan's contractors, consultants, suppliers, and agents to abide by the values of our Code of Conduct and Ethics, reflected in our Vendor Code of Conduct, in connection with their work for Anaplan.

2.5 Anaplan's Code of Conduct and Ethics states expressly:

"We respect human rights, provide fair working conditions, and prohibit the use of any slavery, servitude, forced, compulsory, or child labor and human/sex trafficking by Anaplan or any organization in Anaplan's supply chain."

2.6 The Code of Conduct and Ethics is underpinned by:

(a) A statement of possible sanctions: Anyone who violates the law, our Code of Conduct and Ethics, or other Anaplan policies or procedures may be disciplined, including termination of employment and/or his or her business relationship with Anaplan, in accordance with local legal requirements. Certain violations of this Code of Conduct and Ethics may be violations of the law, which may result in civil or criminal penalties, and Anaplan will cooperate fully with the appropriate authorities in these situations;

(b) A compliance hotline: If we witness—or even suspect—a violation of our Code of Conduct and Ethics, our Vendor Code of Conduct, Anaplan policies, or the law (which includes any instance or suspected instance of modern slavery), we promptly report it to our manager, our Legal Department, Human Resources Department or via our compliance hotline; and

(c) Express support for whistleblowers: Anaplan takes its non-retaliatory culture very seriously and will not allow anyone to take adverse action, threaten, intimidate, harass or retaliate if one of us reports a violation or suspected violation in good faith, or cooperates in an investigation. Anaplan considers retaliation itself a violation of this Code of Conduct and Ethics and will respond accordingly.

2.7 We will uphold all laws relevant to countering slavery and human trafficking in all the jurisdictions in which we operate. We understand that we are covered by the UK Modern Slavery Act 2015 because:

- (a) we are a body corporate;
- (b) carrying on business or a part of its business in the UK;
- (c) which supplies goods or services; and
- (d) has a turnover of over £36 million per year.

### **3. Our structure**

3.1 We are a part of the Anaplan group of companies. Our holding company is Anaplan Inc.

### **4. Our business**

4.1 Anaplan is pioneering the category of Connected Planning with a cloud-based platform providing Software as a Service. Our platform, powered by our proprietary Hyperblock™ technology, purpose-built for Connected Planning, enables dynamic, collaborative, and intelligent planning. Based in San Francisco, we have 16 offices globally, 259 partners, and more than 2,222 customers worldwide.

4.2 The turnover of Anaplan Limited in the financial year was £251,184,989.

### **5. Our supply chains**

5.1 Our suppliers primarily consist of:

- (a) data centres that host our platform,
- (b) other SaaS (software as a service) providers;
- (c) professional service companies such as lawyers and accountants; and
- (d) suppliers who enable us to operate our facilities such as reception and security.

5.2 As a SaaS company we have assessed that the risk of slavery and human trafficking taking place in our own business or in our supply chains is relatively low. We operate in a technology environment with primarily professional, motivated, skilled and educated employees where the type of exploitation associated with modern slavery is unlikely to thrive. However, we are not complacent.

### **6. Our policies on modern slavery and human trafficking**

6.1 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct and Ethics and our Vendor Code of Conduct reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls.

### **7. Due diligence processes for modern slavery and human trafficking and remediation**

7.1 As part of our initiative to identify and mitigate risk we engage in a due diligence process with our suppliers to ensure that we and they maintain supply chains in compliance with all laws and regulations.

7.2 Our suppliers are required to sign a Master Service Agreement wherein each supplier agrees to comply with our Vendor Code of Conduct which states expressly:

“We expect our Vendors to respect human rights and provide fair working conditions in accordance with all labor laws and human rights laws in relevant jurisdictions. Anaplan prohibits the use of any slavery, servitude, forced, compulsory, or child labor and human trafficking by Vendor or any organization in Vendor’s supply chain. Vendor must not use or permit any form of forced, bonded, or indentured labor. Vendor must not hold workers’ identity, immigration, or work permit documents longer than reasonably necessary for administrative processing. This applies to all workers, including temporary, student, intern, migrant, direct, or any other type of worker.”

7.3 Anaplan is committed to investigating any report of potential incidents of modern slavery occurring anywhere in our operations or supply chains.

In line with our values and commitments we confirm that we would take all appropriate steps to rectify any confirmed incidents of modern slavery in our operations or supply chains. Anaplan would work collectively with its suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, Anaplan would take steps to sever its connections to the offending supplier or sub-supplier.

## **8. Supplier adherence to our values and compliance team**

8.1 To ensure all those in our supply chains and also our contractors comply with our values and ethics we have our Vendor Code of Conduct.

8.2 We manage compliance as a team, which consists of representatives from the following departments:

- (a) Legal;
- (b) Audit and compliance; and
- (c) Procurement.

8.3 The team reports to the General Counsel who has overall responsibility for Anaplan's response to the challenge of modern slavery and human trafficking.

## **9. Effectiveness of actions taken**

9.1 It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that slavery and human trafficking is not taking place in our business or supply chains. As part of our ongoing work we will be considering how best to monitor the effectiveness of the actions taken.

9.2 We can say that we are not aware of any modern slavery having taken place in our business or in our supply chains.

## **10. Training**

10.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are in the process of creating updated training for:

- (a) Facilities Management / Procurement;
- (b) Legal;
- (c) Accounting.

10.2 The last training took place after the end of the 2021/2022 financial year, but we include it for completeness.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of **Anaplan Limited** and constitutes our slavery and human trafficking statement for the financial year ending 31 January 2023.