

Modern Slavery Act Transparency Statement *(As of March 10, 2022)*

Splunk is committed to the purpose and principles of the UK Modern Slavery Act 2015 (the “Act”). Splunk strives to maintain the highest ethical standards of conduct and corporate responsibility – to act with integrity and respect for the rights of each human being.

Splunk employees, suppliers, partners and others through whom Splunk conducts business must not engage in any practice that constitutes any form of modern slavery. To demonstrate our commitment to the letter, spirit and principles of the Act, Splunk maintains a program that includes the following actions and policies.

Employees

Splunk Code of Business Conduct and Ethics

Splunk’s employees globally reaffirmed their commitment to and compliance with our Code of Business Conduct and Ethics (the “Code of Conduct”). The Code of Conduct, adopted by a committee of our Board of Directors, states Splunk’s expectation that all employees, suppliers and business partners are committed to upholding the fundamental human rights of others. Splunk employees, suppliers, partners and others through whom Splunk conducts business must not engage in any practice that constitutes any form of modern slavery.

Global Suppliers

The Procurement Governance Initiative:

This effort is designed to ensure Splunk suppliers are viable, in good standing with the government, compliant with regulations and sanctions, and do not participate in illegal practices and activities such as corrupt practices, child or slave labor. Splunk conducts a Vendor Risk Assessment (VRA) as part of its onboarding due diligence. To drive compliance to this Initiative we commit to proactively screening suppliers to ensure Splunk only engages with suppliers who align with our corporate values. We also manage a “Do not do business with” list of suppliers to ensure we do not work with companies banned by regulatory authorities.

In addition:

- We contractually require our suppliers to comply with all applicable laws.
- We include additional provisions in our supplier agreements, which require our suppliers to confirm that there is no existing nor will there be future practices of human rights abuse, child or forced labor. We also require our suppliers to take steps to ensure that any subcontractors they use also comply with the provisions.
- Suppliers undergo a due diligence background check conducted by a third party, to the extent permitted under applicable law.

Suppliers are required to inform us of any known breaches of laws.

Channel Partners

- All new channel partners are required to confirm whether they have had, or have been investigated for, any breaches of human rights.
- We contractually require our channel partners to comply with applicable laws and with our Partner Code of Conduct.
- All new channel partners are required to go through a third-party due diligence background check prior to entering into an agreement with Splunk, to the extent permitted under applicable law.

Acquired Businesses

We review any organization that we acquire and use a third-party service to perform due diligence background checks on such organizations.

As we expand our business activities and work with suppliers domestically and globally, Splunk remains committed to the protection of internationally proclaimed human rights.



Graham Smith
Interim CEO and Chair of the Board