



Vendor Code of Conduct

Last updated: October 5, 2020

Introduction

The Vendor Code of Conduct (“Code”) describes Anaplan’s expectations of how its Vendors conduct business. This Code reflects Anaplan’s commitment to our values of openness, authenticity, inclusivity, collaboration, creativity, and tenacity. Anaplan expects that its vendors will share and embrace these values as well as our commitment to regulatory compliance.

All Vendors engaged in providing products and services to Anaplan are expected to understand the requirements of this Code, operate in accordance with the expectations outlined in this Code and comply, at a minimum with all applicable laws, rules, regulations and standards within the geographies in which they operate. Vendors must be open and cooperative with the regulators and comply with the global and local jurisdictional requirements. This document summarizes the firm’s expectations from Vendors, subcontractors and their employees.

Overview

Vendors must act with integrity and are expected to demonstrate a commitment to legal, ethical, safe, fair, and environmentally responsible business practices. We seek Vendors that operate in compliance with all applicable environmental laws and focus on working with Vendors that make efficient and effective use of natural resources. We are an inclusive culture and believe discrimination in any form should not be tolerated. Vendors are expected to demonstrate a commitment to inclusive business practices, including without limitation diversity in their workplace.

We are open, transparent, and honest. We keep our commitments to each other, to our customers, and to our partners. We endeavor to communicate with our customers, partners, fellow employees, and Vendors in an honest and unambiguous way, and to avoid making any misstatements of fact, making misleading or exaggerated communications, or creating false impressions. We may make mistakes, but we quickly admit and correct them.

Anti-Discrimination and Harassment

We expect vendors to maintain a workplace free of discrimination, harassment, victimization, and any other form of inappropriate behavior or abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation,



marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status. Vendors are expected to maintain an environment free of harassment, violence and abuse (physical or verbal) at all times. Anaplan is committed to complying with all applicable anti-discrimination laws, and we expect the same of our Vendors.

Vendor Diversity and Inclusion

Anaplan believes that diversity is a social and economic imperative and looks to vendors to share this commitment in their operations and within their supply chain. Vendors are expected to take proactive steps to hire, in full spectrum of businesses – based on the ownership structure (for example, Black-owned, women-owned), scale (for example, small or medium enterprise) or nature of the enterprise (for example, social enterprise) – with the opportunity to compete on a fair and equal basis for business.

Human Rights, Slavery, Forced Labor and Human Trafficking

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 unreasonably restrict workers' freedom to move into, out of, or around at working facilities. 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, contract, migrant, direct, or any other type of worker.

Safe and Healthy Work Environment

Vendors must provide a safe and healthy working environment that minimizes health and safety risks and supports accident prevention and ensures the health and safety of all personnel and all others affected by their activities. Vendors are required to, and shall require their subcontractors to, comply with all applicable safety and health laws and regulations in the jurisdictions in which they operate. Vendor is required to report accidents, injuries and unsafe conditions, procedures, or behaviors to the appropriate authorities.

Environmental Responsibility

We expect our Vendors to respect the environment. Vendors must conduct business in an environmentally responsible and sustainable manner, and pledge to comply with all applicable environmental laws and participating in voluntary disclosures in support of our corporate



objectives. Vendor commits to meet all environmental, sustainability, and corporate social responsibility objectives as a Vendor.

Anti-Bribery and Anti-Corruption

We expect our Vendors to be responsible and law abiding. This includes all applicable international, national, and local laws, rules, and regulations. Vendors must report wrongdoing, including fraud or illegal acts, to the appropriate legal authorities.

Vendors must not engage in or permit bribery. This includes making or accepting bribes, kickbacks or facilitation payments or similar corrupt transactions to advance our business. A bribe is something of value that is offered or given to improperly influence a decision. Bribes often consist of money, but they could also be disguised as gifts, trips, entertainment, charitable donations, favors, or jobs. A kickback is a bribe that is generally paid after the fact, e.g., a payment to the employee in exchange for the employee's assistance in steering business to the Vendor. A facilitation payment is a bribe paid to expedite a process or avoid a delay. Vendor must not offer or give anything of value for an improper or corrupt purpose, whether in dealings with a government official or the private sector, and regardless of the norms of local custom.

Vendors must maintain accurate and complete business and financial records. Vendor must create and maintain financial records in accordance with applicable legal requirements and generally accepted accounting practices. Vendor's SEC reports, disclosures, and other public communications must be full, fair, accurate, timely, and understandable.

Vendors must compete in the marketplace in a fair and lawful manner. Vendor agrees to comply with antitrust and competition laws in all the countries and jurisdictions in which it operates. Antitrust laws and regulations prohibit unlawful restraint on trade and unlawful agreements or actions that reduce competition. Anaplan strictly prohibits agreements with competitors to fix or control pricing or allocate markets or customers or to boycott specified customers or Vendors. Applicable laws specifically prohibit Vendors from colluding with a competitor.

Vendors must not engage in unfair methods of competition or deceptive practices such as making false representations about Anaplan's products or its own products, making unsubstantiated product claims, and falsely disparaging a competitor. Vendors must deal fairly with our customers, sub-Vendors, competitors, and employees. Vendor should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair dealing.

Insider Trading

Vendor must not engage in insider trading. Federal law prohibits both trading on the basis of material non-public information and "tipping" others by providing material non-public information to them. Material nonpublic information is information that has not been released to the public



and which a reasonable investor would find useful in determining whether to buy or sell stock, e.g., financial results, sales results, acquisitions, customer wins or losses, or changes in senior management. We do not buy or sell stock on the basis of material non-public information, or pass such information to any others, including friends or family. Vendor must not use information about Anaplan customers, partners or another Vendor to trade in the stock of the customer, partner or other Vendor.

Data Protection Obligations

We expect our vendors to protect confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of Anaplan.

Vendor shall follow all applicable security policies for safeguarding Anaplan user and potential users' information. This includes protecting your employee's network, laptops, mobile phones and other equipment that might have access to confidential information, as well as maintaining physical security.

Vendors should recognize that unauthorized use or disclosure of such information may have personal, legal, reputational and financial consequences for the vendor, individuals whose personal information may be implicated, and for Anaplan. Vendors must comply with all applicable privacy and data protection and information security laws and regulations. In addition, Vendors who process information on behalf of Anaplan must do so in compliance with [Anaplan's Privacy Policy](#) and [Anaplan's Data Processing Addendum](#).

Anaplan may require a prior security assessment of an outside party that may receive or have access to confidential information. Vendor hereby agrees to cooperate in any such assessment.

Report Violations

If Vendor wishes to self-report any violations of the Code, other Anaplan policies, or the law, Vendor shall:

- Promptly report it to privacy.vendors@anaplan.com or via our compliance hotline; or
- Send an email or letter to our Legal Department at legal@anaplan.com or 50 Hawthorne Street, San Francisco, California 94105 USA, Attn: Vice President, Legal; or
- Report on our Ethics Hotline (anonymously or not) by phone at +1 844-823-8923 (other local country phone numbers are available online) or online at <http://anaplan.ethicspoint.com>.