

Modern Slavery Act Transparency Statement *(As of March 16, 2023)*

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.

Global Suppliers

Suppliers are now subject to the [Supplier Code of Conduct](#).

In particular, Splunk’s Suppliers must employ all workers on a voluntary basis free from any threat of violence, threats of criminal penalty, and restrictions on personal freedom of movement. Suppliers must not use recruitment fees for workers that create indentured servitude and Suppliers must not use any prison, slave, bonded, forced labor, trafficked individuals, indentured, or debt induced labor, or engage in any other forms of compulsory labor, or any other forms of slavery or human trafficking. Support for or engagement in any form of human trafficking or involuntary labor is prohibited. Splunk’s Suppliers must also ensure that wages and benefits must meet legal minimums and industry standards without unauthorized deductions. Workers must be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

All Suppliers are expected to monitor their own compliance with this Supplier Code and must inform us promptly of any non-compliance. In addition we may from time to time require that Suppliers undertake a review of activities covered by the Supplier Code, and we expect our Suppliers to provide us with responses to reasonable requests for relevant information. Downstream Monitoring Suppliers are expected to perform effective monitoring and due diligence procedures for downstream third parties, subcontractors, and other supply chain participants to ensure that this Supplier Code is adhered to in the Supplier’s supply chain.

In addition:

- We contractually require our suppliers to comply with all applicable laws.
- Suppliers undergo a due diligence background check conducted by a third party, to the extent permitted under applicable law.

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.



Gary Steele
President, CEO and Board Member