## Voluntary Modern Slavery Statement for the 2023 Financial Year

#### **Summary**

This statement sets out the steps that SailPoint Technologies, Inc., SailPoint International, Inc. (ABN 71 162 832 322) and our subsidiaries ("SailPoint") have taken and are continuing to take to ensure that modern slavery and human trafficking are not taking place within our business or supply chain. We have consulted the relevant companies we own or control in the development of this statement. This statement relates to the 2023 financial year (1 January 2023 to 31 December 2023).

SailPoint's fundamental policy is to conduct its business with honesty and integrity in accordance with the highest legal and ethical standards. We are committed to protecting and respecting human rights and have a zero-tolerance approach to modern slavery in our business dealings and supply chain in all forms including human trafficking, servitude and forced labor.

#### Our Structure

SailPoint is headquartered in the United States, and has office locations in Australia, Canada, Dubai, France, Germany, Hong Kong, India, Israel, Japan, Mexico, the Netherlands, Singapore, and the United Kingdom. While the majority of our business is conducted in these jurisdictions, we also conduct business in a number of other countries around the world.

## Our Operations and Supply Chain

Our products, services and software development are generally provided in-house by SailPoint, rather than by third parties. Our global procurement team is based in our headquarters in the United States. We offer both software and software-as-a-service solutions, which provide organizations visibility and the intelligence required to both seamlessly empower users and securely manage their access to systems, applications and data across hybrid IT environments, spanning on-premises and cloud applications and file storage platforms. Given the nature of our business, our supply chain consists of the hiring of independent consultants and other service providers, along with the procurement of goods and services which support the day-to-day function and growth of SailPoint. Accordingly, we consider ourselves to be low risk with respect to slavery and human trafficking issues in our supply chain.

#### Key Controls (including actions taken)

In 2023, we continued to implement our modern slavery framework, which includes a number of policies and practices to ensure we conduct business in an ethical manner. This framework establishes SailPoint's processes in respect to modern slavery and also provides our staff with guidance in circumstances where modern slavery is identified. This framework includes:

*Training*. In 2023, we continued to implement a human trafficking training course through which employees within our legal, compliance, procurement and talent acquisition teams must complete training on human trafficking, which includes human trafficking warning signs, how to prevent human trafficking in the organization and its supply chain, and how to support anti-

trafficking efforts through awareness, advocacy and action. We will continue to review the effectiveness of this training each year and make improvements to this training when identified.

Contracting practice. To help mitigate any risk, to the extent possible when we enter into negotiated agreements, we require that our contractors, partners, resellers, vendors and other suppliers comply with all applicable laws, which may include the *Modern Slavery Act 2018* (Cth), depending on the type of the particular transaction and the nature of the counterparty.

Supplier procurement. In 2023, we continued to implement our supplier code of conduct, which we expect our suppliers to review and comply with when doing business with us. The supplier code of conduct contains a requirement that suppliers fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws and to enact practices to ensure compliance with such laws. Additionally, our procurement team requires potential vendors to complete a due diligence questionnaire, to ensure we contract with reputable third parties.

Recruitment policy. We conduct eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Corporate code of business conduct and ethics. We maintain a corporate code of business conduct and ethics which covers a wide range of business practices and procedures and outlines our fundamental policy to conduct business with honesty and integrity in accordance with the highest legal and ethical standards. The policy requires that all SailPoint stakeholders comply with applicable legal requirements of the State of Delaware, the United States and each country in which the company conducts business (including Australia).

## Next Steps in 2024 and Beyond

We will continue to regularly revisit our practices to ensure that modern slavery and human trafficking are not taking place with our business or supply chain, and in doing so, we will take steps including the following:

- review our current internal controls, including to evaluate the effectiveness of our actions being taken to assess and address modern slavery risks;
- review the effectiveness of our human trafficking training course to understand the effect to which participants are more able to identify human trafficking warning signs and take action to prevent human trafficking within the organization and its supply chains;
- review the effectiveness of our supplier code of conduct and supplier due diligence processes to understand the extent to which these practices enable us to engage with more reputable third-party contractors and help those suppliers understand their responsibility to identifying and preventing modern slavery in their supply chains; and
- continue to monitor any potential or arising risks of modern slavery within our supply chain.

We confirm that we will cease submitting voluntary Modern Slavery Statements in Australia in accordance with the *Modern Slavery Act 2018* (Cth) with effect from the extended calendar year reporting period (1 January 2024 to 31 January 2025) onwards. Notwithstanding this, we

confirm we are committed to continually reviewing and assessing the effectiveness of our actions in identifying and managing modern slavery risks in our operations and across our supply chain.

The results of our findings through our ongoing review and monitoring activities will inform our path forward to ensure we are continually improving our response to modern slavery, including by amending existing, or developing further, policies and practices in our overall modern slavery framework.

# **Board Approval**

This statement has been approved by the Board of Directors of SailPoint Technologies, Inc. and SailPoint International, Inc. (ABN 71 162 832 322).

**Chris Schmitt** 

Director, SailPoint Technologies, Inc.

Date: June 25, 2024

**Chris Schmitt** 

Director, SailPoint International, Inc.

Date: June 25, 2024