



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### AUSTRALIA

**Introduction.** This statement is made pursuant to Section 14 of the Australian Modern Slavery Act 2018 and constitutes the modern slavery and human trafficking statement of Veeva Australia Pty Ltd. for the fiscal year ended January 31, 2023.

**About Veeva.** Veeva Australia Pty Ltd. ("Veeva Australia") is the wholly owned subsidiary of Veeva Systems Inc., which, along with its global subsidiaries (collectively, "Veeva"), is a leading provider of industry cloud solutions for the global life sciences industry. Veeva's offerings span cloud software, data, analytics, professional services, and business consulting. Veeva Australia is incorporated in Australia. It operates in Australia and employed approximately 31 employees as of January 31, 2023.

At Veeva, we are guided by our core value to "Do the Right Thing". We respect human rights and provide fair working conditions. We prohibit and have a zero-tolerance approach to any form of forced, compulsory, or child labor or human trafficking. We are committed to acting ethically and with integrity in all our business relationships around the world and maintain the following policies and practices. We expect our employees, Board members, contractors, consultants, suppliers, and agents to avoid any practice that constitutes modern slavery in connection with their work for Veeva.

**Code of Conduct.** Veeva's global Code of Conduct, approved by our Board of Directors, sets forth our commitment to upholding human rights. Employees are trained upon hire and then annually on our [Code of Conduct](#), and we hold them to the principles set forth therein. We also expect our contractors, consultants, suppliers, and agents to abide by our [Supplier Code of Conduct](#) in connection with their work for Veeva.

**Supply chain and third parties.** We operate as a software-as-a-service, or cloud-based software, business. We consider our business and supply chains to be low risk for involvement in modern slavery and human trafficking. We do not have intricate supply chains, multiple contractor or subcontractor levels, or partnerships with businesses based in impoverished regions of the world where labor laws are nonexistent or unenforced. Our supply chain includes third-party licensed software and software components used in Veeva's solutions, and third-party computing infrastructure. The majority of our suppliers and third-party business partners are national and global companies with established governance structures and their own corporate social responsibility programs, including in relation to modern slavery. This affords Veeva some assurance in engaging in those commercial relationships. Moreover, suppliers and business partners are subject to various forms of vetting, including the verification of information provided to Veeva.

In Australia, the main contractors and subcontractors that Veeva Australia engages are those in which the risk of modern slavery is likely to arise at a level further down the supply chain than the immediate contractual relationship with Veeva Australia. The suppliers we engage in Australia are present in industries relating to workplace cleaning and office maintenance, and office and technical hardware.



To ensure members of our supply chain and contractors comply with our values, including our zero-tolerance approach to human trafficking, we enter into appropriate agreements with all our suppliers and partners. As part of this, we expect all our suppliers and partners to comply with all applicable laws (including the Australian Modern Slavery Act 2018) and our Supplier Code of Conduct.

**Whistleblower Policy.** We have a Whistleblower Policy and operate a whistleblower hotline to maintain an atmosphere of open communication and trust between employees and management and provide a mechanism where employees can raise concerns anonymously. In addition, the whistleblower hotline may also be used by a supplier to make an anonymous report on any suspected or actual violation of Veeva's policies or the law by anyone acting on behalf of Veeva or a supplier. We prohibit any form of harassment, discrimination, or retaliation against whistleblowers.

**Acquired businesses.** We perform due diligence on any organizations we may acquire to identify any practices that may constitute modern slavery.

Each of the above processes are regularly reviewed and updated to ensure the ongoing effectiveness of our compliance program to prevent modern slavery risks. We assess the effectiveness of our processes by partnering with our suppliers and other external parties, tracking suppliers' acknowledgement of our Supplier Code of Conduct, identifying any matters raised via our whistleblower hotline, and reviewing our internal processes. We recognize that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we continue to build upon. We consulted the relevant entities in the development of this statement. This statement has been approved by the board of Veeva Australia Pty Ltd. on July 14, 2023.

---

Brent Bowman  
Director, Veeva Australia Pty Ltd.  
July 16, 2023

---

Josh Faddis  
Director, Veeva Australia Pty Ltd.  
July \_\_\_\_\_, 2023

---

John Howell  
Director, Veeva Australia Pty Ltd.  
July 17, 2023