



# AUSTRALIA MODERN SLAVERY ACT STATEMENT

2021



## Australia Modern Slavery Act Statement

The Australian Modern Slavery Act 2018 (the “Act”) requires businesses to publish an annual statement specifying the efforts taken to prevent slavery and human trafficking anywhere in their own business or their supply chain. This statement sets forth the actions salesforce.com, inc. has taken on behalf of itself and its subsidiaries, to assess and address slavery and human trafficking risks in our operations and in our supply chain for the fiscal year ending January 31, 2021 and actions that we have taken as of the publication of this statement in connection with our effort to continuously improve our ability to assess and address slavery and human trafficking risks. The directly controlled subsidiaries that are Reporting Entities (as defined in the Act) as of January 31, 2021 are ClickSoftware Australia Pty Ltd, Datorama Australia Pty Ltd, ExactTarget Pty. Ltd., SFDC Australia Pty. Ltd., Tableau Australia Pty. Ltd. and Vlocity Australia Pty Ltd (together with Salesforce.com, inc. “Salesforce,” “we,” “us,” and “our”).

Salesforce, a global leader in Customer Relationship Management (CRM), empowers companies to connect with their customers in a whole new way. Our Customer Success Platform includes industry-leading services that span sales, service, marketing, commerce, communities, collaboration, integration and analytics, and a single trusted cloud platform. Salesforce.com, inc. is publicly traded on the New York Stock Exchange (NYSE: CRM), and headquartered in San Francisco, California. In the past year, Salesforce powered companies ranging from small businesses to global enterprises across every industry. Salesforce is committed to a set of core values — trust, customer success, innovation, and equality of every human being.

Salesforce operates in Australia through its subsidiary SFDC Australia Pty. Ltd. (“SFDC Australia”) and the aforementioned Reporting Entities. SFDC Australia itself (and through SFDC Australia’s only subsidiary, SFDC Australia Pty. Ltd. New Zealand Branch) and the other Reporting Entities employed approximately 2,326 employees as of January 31, 2021.

To assess our operational and supply chain modern slavery risks, we conduct a scoping exercise that includes reviewing modern slavery risks and potential supply chain high risk sectors with internal stakeholders responsible for procurement, procurement legal, supplier onboarding, supplier risk and compliance, and subsidiary governance and implement procedures to mitigate modern slavery risks. Additionally, we utilize a third party supplier rating platform (“Ratings Platform”) that provides corporate social responsibility assessments of suppliers. As part of our scoping exercise, prior to the publication of this statement, we compared the top 30 countries by spend in our supply chain with the most recent, as of the date of the submission of this statement, International Trade Union Confederation (“ITUC”) Global Rights Index<sup>1</sup> and Global Slavery Index.<sup>2</sup> We determined that five (Brazil, China, Hong Kong, India and the Philippines) of our top 30 countries were given a Rating 5 (No guarantee of rights) by ITUC and two (Chile and the United States) of our top 30 countries were given a Rating 4 (Systematic violation of rights) by ITUC. We determined that two (India and the Philippines) of our top 30 countries were designated by the Global Slavery Index as having a medium or high risk of modern slavery. The Ratings Platform tracks our suppliers’ policies and procedures related to forced labour and provides services to implement corrective action plans in response to identified areas of improvement. The Ratings Platform also provides monitoring services that report condemnations and controversies related to Salesforce’s suppliers, including reporting on human rights violations.

Our suppliers are a critical part of the Salesforce community. Our supply chain includes data center suppliers, related third-party infrastructure providers, business process outsourcing suppliers and hardware, software, and platform providers. Our supply chains also include the provision of office services and supplies, such as cleaning and IT equipment. Transparency, trust, respect, communication, and ethical conduct are critical to all successful

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<sup>1</sup> [https://files.mutualcdn.com/ituc/files/ITUC\\_GlobalRightsIndex\\_2021\\_EN\\_Final.pdf](https://files.mutualcdn.com/ituc/files/ITUC_GlobalRightsIndex_2021_EN_Final.pdf)

<sup>2</sup> <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>

business endeavors. These values provide a strong foundation for Salesforce and for its relationships with suppliers.

Salesforce is also committed to not only abide by the laws and regulations that apply to us as we conduct business around the world, but to be a leader in the areas of compliance and ethics as we've outlined in our [Stakeholder Impact Report](#).

The [Salesforce Code of Conduct](#) outlines how Salesforce and its subsidiaries conduct business and describes the company's most fundamental shared values. It provides Salesforce employees guidance on how to follow company policies, applicable laws, rules and regulations, as it is vital that all employees act with integrity and in accordance with local laws.

We partner with our suppliers and set clear expectations outlined in our [Salesforce Global Supplier Code of Conduct](#) ("Supplier Code"), which is acknowledged by our suppliers as part of our supplier on-boarding process. We expect our suppliers to establish policies and procedures to ensure compliance with the Supplier Code and all applicable laws and regulations.

Should we become aware of any policy violations or issues related to slavery or human trafficking, we will consult with our Legal Department to ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with the supplier.

**Salesforce conducts the following actions to help prevent forced labour, modern slavery and human trafficking:**

1. Global Supplier Code of Conduct Acknowledgement
  - a. Our Supplier Code serves as a guide to ethical supplier conduct. The Supplier Code applies to all third party suppliers of products or services that are paid directly by Salesforce, including consulting firms, independent contractors, staffing agencies, agency temps, and licensors, regardless of their title or the product or service they provide ("suppliers"). Suppliers must acknowledge receipt of the Supplier Code, and agree to provide a copy of it to all supplier personnel assigned to perform services to Salesforce.
2. Supplier Agreements
  - a. All suppliers are subject to legal terms and conditions with Salesforce.
  - b. Assessments of potential suppliers are completed as part of our supplier on-boarding process.
  - c. Salesforce reviews the performance of suppliers based on their relative risk to the company, based on the assessment of cross-functional stakeholders, including the Legal Department. Suppliers deemed highest risk are audited or reviewed on a periodic basis. We work closely with suppliers to develop corrective action plans and carry out all audit findings.
  - d. We perform continuous monitoring of suppliers for changes in policies, environments, contracts and processes.
  - e. Routine supplier segmentation exercises utilizing internal subject matter experts and NGO assessments to assess high risk suppliers by category.
  - f. Continuous monitoring plan for high-risk suppliers as identified by our third party supplier rating platform.
  - g. Remediation for identified issues or termination of supplier relationship if a supplier refuses remediation measures.
3. Training
  - a. Salesforce conducts Salesforce Code of Conduct training and certification annually for all Salesforce employees.
  - b. We expect our suppliers to communicate the principles in the Supplier Code to their employees and third party partners through training, policy and other messaging.

We assess our effectiveness in monitoring and managing modern slavery risks by regularly auditing our internal governance processes and by tracking the feedback received from the Ratings Platform. As of the publication of this statement, we are developing an additional corrective action plan program that will be implemented through

the Ratings Platform and also developing a strategy to work with suppliers to address their Ratings Platform corrective action plans.

This statement was approved by the board of directors of each of ClickSoftware Australia Pty Ltd, Datorama Australia Pty Ltd, ExactTarget Pty. Ltd., SFDC Australia Pty. Ltd., Tableau Australia Pty. Ltd. and Vlocity Australia Pty Ltd.

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