



## **Splunk Services Australia’s Statement on the Prevention of Slavery and Human Trafficking**

Splunk respects the protection of internationally proclaimed human rights. Splunk is committed to upholding the fundamental human rights of our fellow employees, and we expect our vendors, partners and others who provide services on behalf of Splunk to adhere to the same high standards. Splunk rejects all forms of child, forced, or slave labour and prohibits unlawful discrimination.

### **I. Identity of the Reporting Entity**

Splunk Services Australia Pty Ltd (Splunk Services Australia) has prepared this Statement in compliance with the *Australian Modern Slavery Act 2018 (Cth)*. Splunk Services Australia operates under Australian Company Number (ACN) 609 939 817 and Australian Business Number (ABN) 51 609 939 817. Splunk Services Australia is a wholly owned indirect subsidiary of Splunk Inc. Splunk Inc. is a software company headquartered in San Francisco, California, USA. Splunk software offers an open, extensible data platform that supports shared data across any environment, promoting end-to-end visibility for every interaction and business process. Splunk Services Australia provides support services to Splunk Inc. and its affiliates.

### **II. Splunk Services Australia’s Structure, Operations and Supply Chain**

Splunk Services Australia has approximately 250 employees and operates four offices in Australia: Brisbane, Canberra, Melbourne and Sydney. As a wholly owned subsidiary of Splunk Inc., Splunk Services Australia has adopted the policies and procedures of Splunk Inc., including those policies and procedures related to the prevention of modern slavery and the protection of human rights. Splunk Services Australia operates solely in Australia and its sole activities are the provision of sales support and engineering services.

Splunk Services Australia's supply chain consists of approximately sixty first-tier suppliers with whom Splunk Services Australia contracts directly. Splunk Services Australia assigns those suppliers to eight different categories depending on what is being supplied: (1) Benefits & Employee Services; (2) Consulting Professional Services; (3) Infrastructure Technology; (4) Legal Services; (5) Marketing Services; (6) Software; (7) Technology Services; and (8) Workplace & Facilities.

### **III. The Risks of Modern Slavery in Splunk Services Australia's Operations and Supply Chain**

Splunk Services Australia has assessed the risk of modern slavery in its operations, and based on prevailing guidance and industry standards, has determined that the risk of modern slavery in its immediate operations is low. All of Splunk Services Australia's employees are legally authorized to work in Australia. Splunk Services Australia complies with all applicable Australian labour and employment laws and regulations.

Furthermore, Splunk Services Australia has considered the table of modern slavery risk indicators contained in the *Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities*. Virtually none of the risk indicators are present in Splunk Services Australia's operations. Splunk Services Australia uses a highly skilled workforce and does not typically rely on temporary or seasonal labour given the perennial nature of the Company's business. Splunk Services Australia does not typically use short-term contracts for its employees, other than in limited circumstances such as for internships or to cover periods of an employee taking parental leave. Splunk Services Australia does not directly employ uniformed security or cleaning personnel. Splunk Services Australia does not use any child labour. Splunk Services Australia's recruiters do not target individuals from marginalized or disadvantaged communities.

Likewise, there is minimal risk of modern slavery in Splunk Services Australia's first tier suppliers. Splunk Services Australia's first tier supply chain largely consists of technology experts, consultants, lawyers, and other highly skilled professionals. The primary risk of modern slavery in the first tier of Splunk Services Australia's supply chain is present in the provision of courier services because of the risks of the withholding of wages, as well as language and communication barriers present in the courier industry. Splunk Services Australia does not heavily rely on courier services (they represent less than 1% of Splunk Services Australia's supply chain by annual spend).

The risk of modern slavery in Splunk Services Australia's supply chain only begins to emerge lower down the supply chain. For example, Splunk Services Australia does not own property, it leases office space. Splunk Services Australia contracts with building owners for the provision of commercial office space. Those building owners manage the properties in which Splunk Services Australia operates. We

recognize there is a risk of modern slavery in the second tier supply chain when the building owners contract with cleaning services because of the risks of debt bondage, withholding of wages, dangerous or substandard working conditions and deceptive recruitment practices present in this industry.

Another area where second tier suppliers may present a risk of modern slavery is event planning because of the risks of withholding wages, exploitation of young workers, and sourcing materials from high risk jurisdictions in this industry. Splunk Services Australia contracts with several event planning entities. Splunk Services Australia does not currently have visibility into the nature of the labour or the origins of the materials that those entities provide and how they are obtained but we will seek to gain more information in future reporting periods. There are other similar risks in the lower tiers of Splunk Services Australia's supply chain (building security, maintenance personnel, etc.) but the highly skilled nature of the majority of the supply chain, located largely in Australia, makes the overall risk of modern slavery in Splunk Services Australia's supply chain relatively small.

#### **IV. Actions Taken by Splunk Services Australia to Assess and Address the Risks of Modern Slavery**

As a wholly owned subsidiary of Splunk Inc., Splunk Services Australia has adopted Splunk Inc.'s policies and procedures, including those aimed at preventing modern slavery and other human rights abuses. All of Splunk Services Australia's employees annually reaffirm their commitment to and compliance with a Splunk Code of Conduct that requires them to categorically reject all forms of child, forced, or slave labour. Splunk Services Australia ensures that its employees reaffirm their commitment by requiring them to annually sign the Code of Conduct, attesting their understanding thereof. Splunk Services Australia expects its vendors and others who provide services on behalf of Splunk Services Australia to also adhere to these same high standards.

Splunk Services Australia conducts due diligence on its supply chain in partnership with its parent corporation, Splunk Inc. Splunk Inc. has over 6,000 suppliers in its supply chain. Approximately 80% of Splunk Inc.'s supply chain expenditure lies with its top 300 suppliers as measured by annual invoice amounts. By the end of this fiscal year Splunk Inc. will have procedures in place to conduct third-party due diligence, including modern slavery reviews, for those top 300 suppliers. Splunk Inc. and Splunk Services Australia will engage the roughly sixty Splunk Services Australia's first-tier suppliers in the due diligence process by the end of the current fiscal year.

Also beginning this fiscal year (ending January 31, 2023), Splunk Services Australia will require its suppliers to adhere to a Supplier Code of Conduct by requiring its suppliers to sign and agree to the Code as a condition precedent to contracting with Splunk Services Australia. The Supplier Code of Conduct will

require all of Splunk Services Australia's suppliers to comply with all applicable laws and regulations in the countries and jurisdictions in which they operate. The Supplier Code of Conduct will also require all suppliers to only employ workers free from any threat of violence, threats of criminal penalty, and restrictions on personal freedom of movement. The Supplier Code of Conduct prohibits the use of recruitment fees that create bonded labour conditions. Under the Code, suppliers will be prohibited from using any prison, slave, bonded, forced, indentured, or debt induced labour, and will be prohibited from engaging in any other forms of compulsory labour, or any other forms of slavery or human trafficking. Splunk Services Australia's suppliers will have to ensure that wages and benefits meet legal minimums and industry standards without unauthorized deductions. Under no circumstances will Splunk Services Australia's suppliers be permitted to employ workers under the minimum age for work or mandatory schooling as specified by the local law.

Under the Supplier Code of Conduct, Splunk Services Australia's suppliers are only permitted to employ workers who are legally authorized to work in their facilities and are responsible for validating workers' eligibility to work through appropriate documentation. Suppliers must follow local regulations about contracting for labour and they are barred from confiscating immigration documentation from workers. The Supplier Code of Conduct will require supply chain workers to be free to leave work or terminate their employment upon reasonable notice. The Supplier Code of Conduct will require suppliers to pay for return transportation if a worker has been brought cross-border by the supplier and the worker does not have the legal right to stay within a country after the end of employment or the expiration of a work contract. Splunk Services Australia's contracts with suppliers include an audit rights provision and, after implementation of the Supplier Code of Conduct, Splunk Services Australia will, when necessary, exercise that audit right to investigate indicia of modern slavery in its supply chain.

**V. Splunk Services Australia's Self-Assessment as the Effectiveness of Its Programs Aimed at Combatting Modern Slavery**

Although the risk of modern slavery in Splunk Services Australia's operations and first-tier supply chain is considered to be low, and although there is a due diligence program in place in relation to some of Splunk, Inc's top suppliers, a company can always do more. Splunk Inc., and by extension Splunk Services Australia, is currently expanding both the breadth and scope of its modern slavery due diligence program. Splunk Inc. is implementing programs to better monitor its supply chain, including Splunk Services Australia's supply chain, through enhanced, ongoing third-party due diligence that will feature enhanced

due diligence on suppliers operating in high risk jurisdictions or industries. Splunk Inc. also recently hired (April 25, 2022) a Senior Counsel with modern slavery as an assigned compliance focus area. The efforts to better combat the risks of modern slavery in Splunk Services Australia's supply chain will be shared by that new Splunk Inc. Senior Counsel and Splunk Services Australia's in-country compliance counsel. Together, the new Senior Counsel and Splunk Services Australia's in-country compliance counsel are charged with driving enhancements to the due diligence conducted on Splunk's (including Splunk Services Australia's) supply chain. Those enhancements will include implementation of a risk-based due diligence approach that will consider a supplier's geographic location (does it operate in a high risk country?) and industry (does it operate in a high risk industry?).

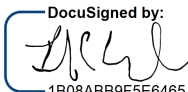
## **VI. Consultation**

This statement has been prepared with extensive consultation between Splunk Services Australia and Splunk Inc, both in the assessment of the supply chains of the entities, assessment of risk and in the development of actions taken to address modern slavery risk in the future.

This statement has been reviewed and approved by the Board of Directors of Splunk Services Australia, on August 11, 2022 with input from other relevant stakeholders.

**Signed by**

**Timothy Curtis Emanuelson:**

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Date: August 11, 2022