

Voluntary Modern Slavery Statement for the 2021 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 2021 financial year (1 January 2021 to 31 December 2021).

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, France, 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)

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

Training. In 2021, we took steps to develop a human trafficking training course through which we will require certain employees within our organization to complete a 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 intend to implement and roll out this training course beginning in 2022.

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, depending on the type of the particular transaction and the nature of the counterparty.

Supplier procurement. In 2021, we took steps to develop 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. We intend to implement and rollout our supplier code of conduct beginning in 2022. 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.

Next Steps in 2022 and beyond

We will revisit and update our voluntary Modern Slavery Statement in the 2022 financial year and in doing so, will take steps including the following:

- Reviewing our current internal controls, including to evaluate their effectiveness of our actions being taken to assess and address modern slavery risks
- Implementing our human trafficking training course and our supplier code of conduct
- Continuing to monitor any potential or arising risks of modern slavery within our supply chain

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 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).

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Mark McClain
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Mark McClain

Director, SailPoint Technologies, Inc.

Date: Jun 29, 2022

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