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## **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 as a single reporting entity in compliance with section 13 of the *Modern Slavery Act 2018 (Cth)* (***Modern Slavery Act***). This is the second Statement filed by Splunk Services Australia and relates to the reporting period that ended on 31 January 2023. Splunk Services Australia continues to operate 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 and is not a reporting entity within the meaning of the Modern Slavery Act. Splunk Services Australia provides support services to Splunk Inc. and its affiliates.

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. In particular:

*[Splunk's] purpose is to build a safer and more resilient digital world. Every day, we live this purpose by helping security, IT and DevOps teams keep their organizations securely up and running. When organizations have resilient digital systems, they can adapt, innovate and deliver for their customers.<sup>1</sup>*

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<sup>1</sup> [https://www.splunk.com/en\\_us/about-splunk.html](https://www.splunk.com/en_us/about-splunk.html)

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

Splunk Services Australia has approximately 315 employees and operates four offices in Australia located in 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 eighty suppliers with whom Splunk Services Australia contracts directly. Splunk Services Australia recategorised its supplier categories in the context of broader operational re-organisation. Splunk Services Australia's suppliers are now categorised as follows:

- 1) Technology & Product.
- 2) Human Resources Benefits & Employee Services.
- 3) IT Services/ Splunk Global Security.
- 4) Corporate Services.
- 5) Marketing & Sales.
- 6) Software.

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

Splunk Services Australia continues to assess its operations and supply chain against the table of modern slavery risk indicators contained in the *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities*.

### ***Operations***

During the reporting period, Splunk Services Australia did not significantly change its operations, therefore the risk of modern slavery occurring in its operations remains low.

Splunk Services Australia continues to use a highly skilled workforce. All of Splunk Services Australia's employees are legally authorised to work in Australia. Splunk Services Australia complies with all applicable Australian labour and employment laws and regulations.

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 extended leave. Splunk Services Australia does not directly employ uniformed security or cleaning personnel, as

these services are provided by the properties in which Splunk Services Australia leases its office space. Splunk Services Australia does not use any child labour in its operations.

### ***Supply chain***

Splunk Services Australia's first tier suppliers have also been assessed as low-risk. During the reporting period, Splunk Services Australia worked to consolidate its suppliers to streamline its operations and lower modern slavery risk exposure. Its first tier supply chain remains primarily made up 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, that have been present in the courier industry. Splunk Services Australia does not rely heavily on courier services (they represent less than 1% of Splunk Services Australia's supply chain by annual spend).

Increased risks of modern slavery in Splunk Services Australia's supply chain begin to emerge lower down the tiers of the supply chain. For example, Splunk Services Australia does not own property, it leases office space. Splunk Services Australia contracts with the building owners for the provision of commercial office space and associated services. Those building owners manage the properties in which Splunk Services Australia operates. We recognize there may be a risk of modern slavery in the second tier supply chain when the building owners contract with cleaning services. This is because of the increased risk in that industry of practices involving debt bondage, withholding of wages, and substandard working conditions.

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, means that the overall risk of modern slavery in Splunk Services Australia's supply chain remains relatively low.

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

Splunk Services Australia operates within Splunk Inc.'s global operations and supply chain, and applies Splunk Inc.'s policies and procedures relevant to modern slavery and human rights abuse prevention. Splunk Services Australia continues to require all its employees to undertake annual training on the Code of Business Conduct and Ethics – which includes signing an attestation that they have read, understood and will comply with it. In addition to the annual mandatory compliance training, all new

Splunk Services Australia employees are required to undertake new hire training within their first 30 days of employment that includes confirming their commitment to the Code of Business Conduct and Ethics.

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. It is for this reason that the Supplier Code of Conduct has been implemented, which is further detailed below.

***Expanded due diligence and supplier monitoring program***

Splunk Services Australia, through collaboration with Splunk Inc., committed to expanding its due diligence of its suppliers by the end of this reporting period.

The expanded due diligence was planned to be delivered through the launch of various system enhancements which would enable near-real-time monitoring of supplier risks (the **Supplier Monitoring Program**). The full implementation of the Supplier Monitoring Program was delayed due to operational constraints during the reporting period. However, Splunk Services Australia was able to launch the foundation for the Supplier Monitoring Program, as well as an integration project which will seamlessly integrate information from supplier risk reporting into the Supplier Monitoring Program.

As such, suppliers will be automatically screened by way of a prequalifying questionnaire (which was previously conducted manually) with respect their compliance in the following relevant areas:

- anti-bribery and corruption, anti-money laundering and other financial misconduct;
- employee discrimination;
- anti-competitive behaviour;
- criminal or civil litigation; and
- slavery or human trafficking offences in any jurisdiction.

Splunk Inc. is also implementing a new risk module, which will be introduced across Splunk Services Australia's operations and supply chain, which will systematically monitor active Splunk suppliers for their financial health, regulatory risks or actions, and environmental and social violations. Specific to Splunk Services Australia's actions in respect of modern slavery, the risk module will screen for human trafficking, sexual exploitation, exploitation of children, forced and slave labour, human rights violations, and illegal restraint or kidnapping.

***Supplier consolidation***

As noted above, Splunk Services Australia, along with other Splunk Inc. entities, has been working to consolidate its supply chain, mainly through the consolidation of existing vendors providing specific products and services. Supplier consolidation practices emphasise engagement with suppliers who have higher standards of supply chain management, thereby reducing the overall risk of modern slavery occurring in their operations and supply chains. Splunk Services Australia is using this supplier consolidation to improve oversight of its supply chain.

### ***Supplier Code of Conduct***

During the reporting period, Splunk Services Australia finalised the implementation of its Supplier Code of Conduct (the **Code**). As part of this process, Splunk Services Australia provides the Code to all suppliers and requires them to agree to the Code as a condition precedent to contracting with Splunk Services Australia. Additionally, all existing suppliers of Splunk Services Australia were sent a copy of the Code.

The Code requires all Splunk Services Australia's suppliers to:

- comply with all applicable laws and regulations in the countries and jurisdictions in which they operate;
- only employ workers free from any threat of violence, threats of criminal penalty, and restrictions on personal freedom of movement;
- prohibit the use of recruitment fees that create bonded labour conditions;
- commit to prohibiting any prison, slave, bonded, forced, indentured, or debt induced labour, or engage in any other form of compulsory labour, or any other forms of slavery or human trafficking;
- ensure that wages and benefits meet legal minimums and industry standards without unauthorized deductions;
- ensure that under no circumstances will the suppliers be permitted to employ workers under the minimum age for work or mandatory schooling as specified by the local law;
- only employ workers who are legally authorised to work in their facilities and are responsible for validating workers' eligibility to work through appropriate documentation;
- follow local regulations about contracting for labour and they are barred from confiscating immigration documentation from workers;

- allow supply chain workers to be free to leave work or terminate their employment upon reasonable notice; and
- 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.

Implementation of the Code will be supported by ensuring that all existing suppliers are provided with the Code annually to refresh their commitments, as well as all new suppliers engaged by Splunk Services Australia.

Finally, Splunk Services Australia's contracts with suppliers include an audit rights provision. Where deemed necessary by Splunk Services Australia, it will be able to exercise that audit right to investigate indicia of modern slavery in the supply chain of its suppliers. Splunk Services Australia considers these measures to be important in increasing its supplier oversight and engagement in the mitigation of modern slavery risks.

Splunk Services Australia will also consider what measures it can adopt to effectively remediate any human rights harms or instances of modern slavery if they arise in its operations and supply chain over the next reporting period. Splunk Services Australia considers that remediation activities will be greatly assisted by the implementation of the Supplier Monitoring Program detailed above.

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

Splunk Services Australia is committed to continuous improvement in identifying, assessing and addressing its modern slavery risks. Splunk Services Australia faced some operational challenges in implementing its monitoring program and some of the actions it had intended to complete during this reporting period. However, its roll-out of the Supplier Code of Conduct and laying the foundation for the improved supplier risk management system are considered positive progress in responding to modern slavery risks in its operations and supply chain.

The risk of modern slavery in Splunk Services Australia's operations and first-tier supply chain remains low, and Splunk Services Australia will work towards lowering that risk even further through the implementation of its Supplier Monitoring Program during the next reporting period.

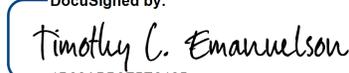
Splunk Services Australia will look to improve its assessment of the effectiveness of its modern slavery actions by assessing supplier engagement and risk mitigation measures once the Supplier Monitoring Program is fully operationalised.

## **VI. Consultation**

Although Splunk Inc. is not a reporting entity under the Modern Slavery Act, the linkages between its supply chain and that of Splunk Services Australia has meant that Splunk Services Australia engaged in extensive consultation with Splunk Inc. to assess its modern slavery risks, current and future actions to address these risks. Splunk Services Australia does not own or control any entities for the purpose of reporting under this Statement.

This Statement has been reviewed and approved by the Board of Directors of Splunk Services Australia, on August 30, 2023 with input from other relevant stakeholders.

Timothy Curtis Emanuelson, Director

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