



Anaplan, Inc.
Code of Conduct and Ethics

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1. INTRODUCTION

This Code of Conduct and Ethics and our company values represent the standards by which we all must operate. All employees of Anaplan, Inc. or any subsidiary of Anaplan, Inc. (collectively, “Anaplan”), as well as Anaplan’s officers and Board members, must abide by this Code of Conduct and Ethics. We also expect Anaplan’s contractors, consultants, suppliers, and agents to abide by our Code of Conduct and Ethics in connection with their work for Anaplan.

2. MISSION AND VALUES

Anaplan is a pioneer in the category of Connected Planning. Our mission is to enable organizations to harness the benefits of Connected Planning to transform their businesses by making better and faster decisions. Anaplan’s values support this mission and define how we conduct our business with employees, customers, partners and suppliers. They are:

- **Open.**
- **Authentic.**
- **Inclusive.**
- **Collaborative.**
- **Creative.**
- **Tenacious.**

At Anaplan, we share a common DNA. We call this being A-shaped. An A-shaped person lives our values every day, and gets their work done in the following ways:

- **A-shaped people start with our customers**
- **A-shaped people think big and act bold**
- **A-shaped people win with speed and innovation**
- **A-shaped people act like owners**

Anaplan expects that each of us will follow both the letter and spirit of these values and this Code of Conduct and Ethics, including the following specific principles.

3. CERTIFICATION

3.1 You are required to acknowledge that you have read and understand Anaplan’s Code of Conduct and Ethics and know how to report:

- (a) actual or potential conflicts of interests; and
- (b) ethical violations.



3.2 All new Anaplan employees are required to provide an initial certification and any applicable disclosures during their new-hire orientation process. All employees are required to disclose actual or potential conflicts of interest if and when they arise. You may consult with the Legal Department for questions related to conflicts of interest.

4. DATA PROTECTION

4.1 We safeguard confidential information and protect employee privacy.

We are committed to protecting the confidential, proprietary, and private information of our employees, customers, partners, and others with whom we do business, including the financial and operational information of our customers submitted in connection with use of our platform. We respect and safeguard the private information and intellectual property entrusted to us by our fellow employees, customers, and third parties, using it only for legitimate business purposes and in accordance with all applicable laws and governing contracts.

Anaplan may require a prior security assessment of an outside party that may receive or have access to confidential information. We are all also responsible for protecting Anaplan's confidential information. Disclosure of Anaplan confidential information should be on a "need to know" basis and only under a non-disclosure agreement. The loss of confidential information can be extremely damaging to Anaplan. We do not disclose any confidential Anaplan information without a valid business purpose and proper authorization by our Legal Department. Our obligations in this respect continue even if our employment or other relationship with Anaplan ends.

Employees must follow all applicable security policies for safeguarding Anaplan and customer information. This includes protecting Anaplan's network, laptops, mobile phones and other equipment that might have access to confidential information, as well as maintaining physical security. This also includes not using or sharing Anaplan confidential information with any products, services or accounts that are not approved under Anaplan's System Use Policy.

4.2 Basic rules to consider when handling sensitive or confidential data.

Examples of do's and don'ts for handling information:

- **DO** treat all employee, client, partner and Anaplan proprietary information you receive or handle as sensitive and confidential.
- **DO** limit use of sensitive or confidential information to only as necessary for the intended business purpose.



- **DO** follow all guidelines from the IT, Security and other Anaplan teams on storage and handling of sensitive and confidential information.
- **DO NOT** store sensitive or confidential information on personal or other non-Anaplan equipment or hosted services.
- **DO NOT** access, use or transmit sensitive or confidential information unless specifically permitted to do so.
- **DO NOT** access client data or a client workspace without explicit client permission.

4.3 For additional information on protecting confidential information, please see the following policies (though other policies might also apply):

- Anaplan System Use Policy
- Anaplan Information Security and Privacy Policy;
- Information Security Awareness, Education and Training Policy;
- Data Retention Policy;
- Intellectual Property Rights Policy; and
- Privacy and Protection of Personally Identifiable Information Policy.

5. RESPECT FOR OTHERS

5.1 We operate with honesty and integrity and hold ourselves up to the highest standards of ethical conduct in all our business interactions.

We are open, transparent, and honest. We keep our commitments to each other, to our customers, and to our partners. We endeavor to communicate with our customers, partners, fellow employees, and suppliers in an honest and unambiguous way, and to avoid making any misstatements of fact, making misleading or exaggerated communications, or creating false impressions. We may make mistakes, but we quickly admit and correct them.

5.2 We treat others fairly and respectfully.

We foster a respectful work environment free from any form of discrimination, harassment, retaliation and intimidation. We provide equal opportunity in all aspects of employment. We do not tolerate discrimination, harassment, violence, or threatening behavior of any kind. We always treat everyone—fellow employees, customers, partners, and other stakeholders—with dignity and respect.

We have a strict policy against harassment including harassment that is verbal, on social media, physical, visual or sexual in nature. Prohibited harassment can take many forms



including bullying, intimidation, racial slurs, sharing inappropriate or offensive material or making sexual jokes, comments or requests.

If you see, suspect or experience conduct that you believe is prohibited harassment or discrimination, you may contact your manager, the Human Resources Department, the Legal Department or report the conduct through the Anaplan Ethics Hotline at +1 844-823-8923 (other local country phone numbers are available online) or online at <http://anaplan.ethicspoint.com>. We do not tolerate retaliation against anyone who reports concerns in good faith.

5.3 We uphold human rights.

We respect human rights, provide fair working conditions, and prohibit the use of any slavery, servitude, forced, compulsory, or child labor and human trafficking by Anaplan or any organization in Anaplan's supply chain.

5.4 We are committed to a safe and healthy workplace.

We are committed to providing a clean, safe, healthy, secure, and drug-free workplace. Our employees have responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and by reporting accidents, injuries and unsafe conditions, procedures, or behaviors. We do not tolerate violence and threatening behavior. We do not permit the use, possession, sale, or being under the influence of any illegal substance at Anaplan or when representing Anaplan in any capacity or conducting Anaplan business.

5.5 We respect the environment.

We conduct our business in an environmentally responsible and sustainable manner, and we are committed to complying with all applicable environmental laws and participating in voluntary disclosures in support of our corporate objectives. We are committed to helping our customers meet their environmental, sustainability, and corporate social responsibility objectives as a Software-as-a-Service supplier.

6. LEGAL COMPLIANCE

6.1 We are responsible and law abiding.

We follow the law. This includes all applicable international, national, and local laws, rules, and regulations. We report wrongdoing, including fraud or illegal acts, if we encounter it.



6.2 We do not permit bribery.

Anaplan's policy against bribery is clear—we never make or accept bribes, kickbacks or facilitation payments or similar corrupt transactions to advance our business. A bribe is something of value that is offered or given to improperly influence a decision. Bribes often consist of money, but they could also be disguised as gifts, trips, entertainment, charitable donations, favors, or jobs. A kickback is a bribe that is generally paid after the fact, e.g., a payment to the employee in exchange for the employee's assistance in steering business to the supplier. A facilitation payment is a bribe paid to expedite a process or avoid a delay. We do not offer or give anything of value for an improper or corrupt purpose, whether in dealings with a government official or the private sector, and regardless of the norms of local custom. For more information, please consult Anaplan's Anti-Corruption Policy and Travel and Expense Policy, which we are all required to review and follow.

6.3 We maintain accurate and complete business and financial records.

We create and maintain financial records in accordance with applicable legal requirements and generally accepted accounting practices. Our SEC reports, disclosures, and other public communications must be full, fair, accurate, timely, and understandable. Although financial reporting and controls are especially applicable to members of Anaplan's Finance Department, we are each responsible for complying with all financial controls and policies. We each acknowledge our responsibility to make sure that appropriate Finance Department personnel are made aware in a timely manner of any fact or issue that might have a material impact on our financial statements or disclosures.

6.4 We compete in the marketplace in a fair and lawful manner.

We are committed to complying with antitrust and competition laws in all the countries and jurisdictions in which we operate. Antitrust laws and regulations prohibit unlawful restraint on trade and unlawful agreements or actions that reduce competition. Anaplan strictly prohibits agreements with competitors to fix or control pricing or allocate markets or customers or to boycott specified customers or suppliers. Applicable laws specifically prohibit us from colluding with a competitor.

We do not engage in unfair methods of competition or deceptive practices such as making false representations about Anaplan's products, making unsubstantiated product claims and falsely disparaging a competitor.

We endeavor to deal fairly with our customers, suppliers, competitors, and employees. We should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair-dealing. When



interacting with a competitor, questions about whether our actions are proper and in compliance with the law should be directed to our Legal Department.

6.5 We comply with international trade laws and export controls.

Export control laws of the United States govern exports of software, technology and technical data from the United States. Business dealing with certain countries, entities and foreign persons are also prohibited by U.S. laws. The countries in which we operate also have legal requirements around international trade that cover imports or exports, and in some cases, specific licenses may be required. We comply with the Export Administration Regulations issued by the U.S. and we do not engage in business with certain countries subject to U.S. government economic sanctions. International trade compliance is a complex undertaking and we encourage you to consult with the Anaplan Legal Department.

6.6 We prohibit insider trading.

Federal law prohibits both trading on the basis of material non-public information and “tipping” others by providing material non-public information to them. Material non-public information is information that has not been released to the public and which a reasonable investor would find useful in determining whether to buy or sell stock, e.g., financial results, sales results, acquisitions, customer wins or losses, or changes in senior management. We do not buy or sell stock on the basis of material non-public information, or pass such information to any others, including friends or family.

We do not use information about customers, partners or suppliers provided to Anaplan in confidence and gained in the course of employment with Anaplan to trade in the stock of the customer, partner or supplier. Using this information for personal purposes or disclosing it to others is a violation of Anaplan’s Insider Trading Compliance Policy. For more information, please consult Anaplan’s Insider Trading Compliance Policy, which we are all required to review and follow.

7. **CONFLICTS OF INTEREST**

7.1 We avoid conflicts of interest.

We have a responsibility to make sound business decisions strictly on the basis of Anaplan’s best interests without regard to our personal interests. A conflict of interest can occur when our personal activities, investments, or associations compromise our judgment or ability to act in the best interest of Anaplan. We avoid conflicts of interest, or even the appearance of a conflict of interest.



We always disclose any relationships, associations, or activities that may create actual, potential, or perceived conflicts of interest to Anaplan’s Legal Department at legal@anaplan.com as soon as we become aware of any actual or potential conflict.

7.2 We respect corporate opportunities.

We may not take for ourselves, or our immediate family members, opportunities that are discovered through the use of Anaplan property, information, or position, and we will not use Anaplan property, information, or position for personal gain, or compete with Anaplan in any manner. We owe Anaplan a duty to advance its legitimate business interests when business opportunities arise.

7.3 We disclose employment outside Anaplan.

We disclose any employment outside Anaplan that creates an actual or potential conflict of interest with our work at Anaplan. We ensure that our outside employment does not negatively affect our performance at Anaplan. We do not serve as a director, officer, consultant, employee or in any other capacity with a company that is a competitor of Anaplan without the express written approval of Anaplan’s Vice President of Legal.

7.4 We protect and properly use Anaplan assets.

Theft, carelessness, and waste have a direct impact on our profitability. We use Anaplan assets for legitimate business purposes, and in particular, will use Anaplan’s information systems assets in a responsible manner.

8. PUBLIC INTERACTIONS

8.1 We represent Anaplan to the public only when authorized. We do not tolerate unauthorized leaks or disclosures of corporate information.

Only those authorized to do so may speak to the press and members of the financial community about Anaplan. Authorized individuals are the CEO, the CFO, the Vice President of Investor Relations, the Chief Marketing Officer and other individuals as may be designated by the CEO. All inquiries from the press or investors, analysts or the financial community must be immediately directed to the Vice President of Investor Relations.

8.2 We use social media wisely.

We use social media appropriately and responsibly. We do not disclose confidential Anaplan information or the confidential information of our customers, suppliers,



business partners, or other employees. We comply with Anaplan’s Social Media Use Policy. For more information, please consult Anaplan’s Social Media Guidelines or Anaplan’s Marketing Department.

9. APPLYING THE CODE

9.1 Waivers of the Code of Conduct and Ethics.

Waivers of our Code of Conduct and Ethics must be approved in writing. Waivers for Board members and executive officers require Board approval and must be disclosed as required, while waivers involving any other employee, agent, or contractor require the approval of our CEO, CFO or Vice President, Legal.

9.2 Violations of the Code, Anaplan Policies, or the Law.

Anyone who violates the law, our Code of Conduct and Ethics, or other Anaplan policies or procedures may be disciplined, including termination of employment and/or his or her business relationship with Anaplan, in accordance with local legal requirements. Certain violations of this Code of Conduct and Ethics may be violations of the law, which may result in civil or criminal penalties, and Anaplan will cooperate fully with the appropriate authorities in these situations.

9.3 We use common sense and ask questions if necessary.

We use common sense in our business dealings and in upholding this Code of Conduct and Ethics. If we have any questions regarding the matters discussed in this Code of Conduct and Ethics, we promptly contact our manager or our Legal Department for answers.

9.4 Report Violations.

If we witness—or even suspect—a violation of our Code of Conduct and Ethics, Anaplan policies, or the law, we promptly report it to our manager, our Legal Department, Human Resources Department or via our compliance hotline.

9.5 Compliance Hotline.

Anaplan has established an Ethics Hotline that we may use to make an anonymous report. To make a good-faith, anonymous report, we may:

- Send an email or letter to our Legal Department at legal@anaplan.com or 50 Hawthorne Street, San Francisco, California 94105 USA, Attn: Vice President, Legal; or



- Report on our Ethics Hotline (anonymously or not) by phone at +1 844-823-8923 (other local country phone numbers are available online) or online at <http://anaplan.ethicspoint.com>.

For more information, please consult Anaplan’s Compliance Reporting Policy.

9.6 No Retaliation.

Anaplan takes its non-retaliatory culture very seriously and will not allow anyone to take adverse action, threaten, intimidate, harass or retaliate if one of us reports a violation or suspected violation in good faith, or cooperates in an investigation. Anaplan considers retaliation itself a violation of this Code of Conduct and Ethics and will respond accordingly.

9.7 Reporting Issues Outside the United States.

In some locations outside of the United States, anonymous reporting of certain types of issues may not be allowed by local law. If local law prohibits or restricts anonymous reporting, you should reveal your identity when making a report. In those situations, your identity will be kept confidential (unless prohibited by local law), and you will have a right to access and modify your report. If you are in doubt about the requirements of your local law, please contact our Legal Department.