



Anaplan Limited

Slavery and Human Trafficking Statement

1. Financial year

- 1.1 This slavery and human trafficking statement relates to the company's financial year beginning 1 February 2018 and ending 31 January 2019.

2. Introduction

- 2.1 We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our supply chains and in our business.
- 2.2 It is our policy to conduct all business ethically and in accordance with the UK Government's Modern Slavery Strategy, as amended from time to time, and as outlined in the UK Home Office Guidance "Transparency in Supply Chains: a Practical Guide".
- 2.3 We are committed to acting ethically in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter slavery and human trafficking.
- 2.4 Our holding company, Anaplan Inc. has developed a Code of Conduct and Ethics which applies across the Anaplan group of companies of which we are part. 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.
- 2.5 Anaplan's Code of Conduct and Ethics states expressly:
- "We respect human rights, provide fair working conditions, and prohibit the use of any forced, compulsory, or child labor by or for Anaplan."
- 2.6 The Code of Conduct and Ethics is underpinned by:
- (a) A statement of possible sanctions: 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;
 - (b) A compliance hotline: 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; and



- (c) Express support for whistleblowers: 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.

2.7 We will uphold all laws relevant to countering slavery and human trafficking in all the jurisdictions in which we operate. We understand that we are covered by the UK Modern Slavery Act 2015 because:

- (a) we are a body corporate;
- (b) carrying on business or a part of its business in the UK;
- (c) which supplies goods or services; and
- (d) has a turnover of over £36 million per year.

3. Our structure

3.1 We are a part of the Anaplan group of companies. Our holding company is Anaplan Inc.

4. Our business

4.1 Anaplan is pioneering the category of Connected Planning. Our platform, powered by our proprietary Hyperblock® technology, purpose-built for Connected Planning, enables dynamic, collaborative, and intelligent planning. Large global enterprises use our solution to connect people, data, and plans to enable real-time planning and decision-making in rapidly changing business environments to give our customers a competitive advantage. Based in San Francisco, we have over 20 offices globally, 175 partners, and more than 1,300 customers worldwide.

4.2 The turnover of Anaplan Limited in the financial year was approximately £70,982,983.

5. Our supply chains

5.1 Our suppliers primarily consist of:

- (a) data centres that host our platform,
- (b) other SaaS (software as a service) providers;
- (c) professional service companies such as lawyers and accountants; and
- (d) suppliers who enable us to operate our facilities such as reception and security.

5.2 As a SaaS company we have assessed that the risk of slavery and human trafficking taking place in our own business or in our supply chains is relatively low. We operate in a technology environment with primarily professional, motivated, skilled and educated employees where the type of exploitation associated with modern slavery is unlikely to thrive. However, we are not complacent.



6. Our policies on slavery and human trafficking

- 6.1 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct and Ethics reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls.
- 6.2 We are currently developing a specific Anti-slavery and human trafficking policy for Anaplan Limited and will report in more detail on that development in our next Slavery and Human Trafficking Statement.

7. Due diligence processes for slavery and human trafficking

- 7.1 As part of our initiative to identify and mitigate risk we engage in a due diligence process with our suppliers to ensure they maintain a supply chain in compliance with all laws and regulations.
- 7.2 We are also developing a specific Questionnaire for targeted suppliers which deals expressly with modern slavery.

8. Supplier adherence to our values

- 8.1 To ensure all those in our supply chain and contractors comply with our values and ethics we have our Code of Conduct and Ethics.
- 8.2 We have a dedicated compliance team, which consists of representatives from the following departments:
 - (a) Legal
 - (b) Audit and compliance
 - (c) Procurement
- 8.3 The team reports to the VP of Legal Affairs who has overall responsibility for Anaplan's response to the challenge of slavery and human trafficking.

9. Effectiveness

- 9.1 It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that slavery and human trafficking is not taking place in our business or supply chains. As part of our work for the next financial year we will be considering how best to monitor the effectiveness of the actions taken.
- 9.2 We can say that we are not aware of any modern slavery having taken place in our business or in our supply chains.

10. Training

- 10.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided training to the following departments:



- (a) Facilities Management / Procurement;
- (b) Legal;
- (c) Accounting.

10.2 The training took place after the end of the 2018/2019 financial year but we include it for completeness and will provide more details in our next Statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of **Anaplan Limited** and constitutes our slavery and human trafficking statement for the financial year ending 31 January 2019.

Signed:

A handwritten signature in blue ink, appearing to read 'Gary Spiegel', written over a horizontal line.

Director

Name: Gary Spiegel

ANAPLAN LIMITED

Date: December 5, 2019