



Modern Slavery Act

Transparency Statement



Introduction

This Modern Slavery Act Transparency Statement (the “Statement”) is made on behalf of Sprinklr, Inc. and its subsidiaries and affiliates (“Sprinklr”). We are publishing this Statement in accordance with the United Kingdom Modern Slavery Act of 2015 and all other applicable laws and regulations as a demonstration of our commitment to anti-slavery practices and an affirmation of the values we hold and adopt across our business.

Sprinklr is dedicated to ethical and responsible business operations to ensure the way we conduct business reflects our values and belief that everyone should be treated with dignity and mutual respect in an environment free from harassment and discrimination. We are committed to practices that combat modern slavery and human trafficking, and to working with and encouraging any suppliers to uphold the principles in this statement.

This Statement is given for the financial year ending 31 January 2024 and sets out the steps taken during the financial year to prevent modern slavery and human trafficking in Sprinklr’s business and supply chains.

Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labor; and human trafficking. These three terms are defined below:

- a) "Slavery" and "Servitude" mean where people are dehumanized, treated as a commodity, bought or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labor.
- b) "Forced or Compulsory Labor" means where someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse.
- c) "Human trafficking" relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel.

Sprinklr's Modern Slavery Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

Sprinklr has a zero-tolerance approach to modern slavery. Sprinklr is committed to acting ethically and with integrity in all its business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Sprinklr is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of



our contractors, suppliers and other business partners. As part of Sprinklr's contracting processes, Sprinklr includes specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and Sprinklr expects and requires that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery.

Sprinklr's Organizational Structure and Business

Sprinklr is the most complete social media management system for the enterprise. We help the world's largest brands with marketing, advertising, care, sales, research, and commerce on 30+ digital channels – all on one integrated platform.

Sprinklr, Inc. is the ultimate parent company of Sprinklr and is headquartered in New York, New York, USA, with regional headquarters in London and Singapore. Sprinklr's stock is listed on the New York Stock Exchange under the symbol "CXM" and we operate and have subsidiaries all over the world.

Sprinklr recognizes the important role we play in protecting the rights of people, and we are committed to doing the right always – not only for our customers and employees, but also for other stakeholders, partners, and the communities with whom we interact.

Our Employees

We are committed to maintaining a fair and ethical workplace for all our employees that is free of bullying, harassment, discrimination, and violence. Sprinklr also prohibits the use of all forms of forced labor and any form of human trafficking.

Under our [Code of Conduct and Ethics](#), Sprinklr employees must:

- Follow the law;
- Treat everyone honestly and courteously at all times;
- Respect diversity and approach all situations from a place of cultural sensitivity, even when our cultures or ideas may differ; and
- Make a report if there is a suspected violation of human rights, including any act of retaliation that may be witnessed as the result of colleagues standing up for their rights or the rights of others.

We also ensure compliance with all applicable laws relating to employee recruitment and terms and conditions, including obtaining right to work evidence and ensuring that no staff in our global offices are paid less than the applicable national minimum or living wage.



Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy. Breach of this policy may lead to prosecution under the Modern Slavery Act 2015.

Our Governance and Training

We have implemented policies as part of our commitment to ethical business practices and the abolition of all forms of slavery and human trafficking to ensure our business practices are fair, ethical, honest, and in compliance with all applicable laws and regulations. The following governance reflects the importance Sprinklr places in operating in an ethical and compliant manner, as well as our commitment to maintaining a diverse and safe workplace:

- Code of Conduct and Ethics
- Corporate Disclosure Policy
- Insider Trading Policy
- Anti-Corruption Policy
- Whistleblower Policy
- Global Harassment & Discrimination Policy
- Health, Safety, and Sustainability Policy
- Employee Privacy Notice
- Procurement Process

Sprinklr provides training on all governance upon hire and annually thereafter to ensure a unified approach in the application of Sprinklr's governance and the expectations of employees contained therein. Sprinklr's governance is monitored and reviewed at least annually to ensure ongoing effectiveness.

Sprinklr encourages all employees to make good faith reports of any issues of illegal or unethical conduct. If employees become aware of any issues which violate this Statement or Sprinklr governance, Sprinklr's Whistleblower Policy gives employees avenues through which such issues can be raised without fear of retaliation, including through anonymous avenues such as Sprinklr's ethics and compliance hotline. Sprinklr's Compliance and Ethics hotline is hosted through an independent third party and enables anonymous reporting and two-way communications between Sprinklr and the reporter. Sprinklr promptly and thoroughly investigates all concerns, including through external resources, as needed based on the nature of the reported issue. Reports can be made by either calling the toll-free hotline at 800-603-2869 or by submitting an anonymous report via this [secure web form](#).

Sprinklr's Certifications

Sprinklr is annually certified by Ecovadis, whose CSR analysis system covers twenty-one (21) criteria across the four (4) themes of Fair Labor & Human Rights, Ethics, Environment, and Sustainable Procurement. The Ecovadis assessment methodology is built on international CSR



standards, including the Global Reporting Initiative and the United Nations Global Compact (UNGC). Further details of the Ecovadis certification can be found at <https://ecovadis.com/>.

In addition to the integration of UNGC principles within Ecovadis, Sprinklr has also been an express signatory to the UNGC since 2019. The UNGC is a voluntary initiative based on company commitments to implement and annually report on efforts related to human rights, labor, anti-corruption, and environmental sustainability. The UNGC is comprised of Ten Principles which are derived from the [Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#), and the [United Nations Convention Against Corruption](#). The Ten Principles include a commitment to supporting and respecting the protection of internationally proclaimed human rights, ensuring businesses are not complicit in human rights abuses, upholding the freedom of association and collective bargaining, eliminating all forms of forced and compulsory labor, the abolition of child labor, and the elimination of discrimination with respect to one's employment and occupation. Further details on Sprinklr's participation in the UNGC can be found [here](#).

Our Supply Chain and Vendors

As a social media management and customer support cloud-based SaaS platform, Sprinklr does not have an active supply chain of consequence. Sprinklr does not handle raw materials, operate factories, or engage in the manufacture of goods. As a result, Sprinklr's key suppliers are primarily focused on software, data and cloud storage, office facilities and supplies, professional services, and marketing technology. As a result, the risk of modern slavery within Sprinklr's supply chain is low.

Despite this low risk, Sprinklr remains vigilant, and we do not tolerate slavery, human trafficking, or other human rights abuses within our supply chain. We expect all entities within our supply chain to uphold the same high standards Sprinklr has set internally, including ensuring all employees are treated with dignity and respect in a fair and ethical environment. Sprinklr's relationships with third parties are governed by written contracts, and any new suppliers undergo due diligence through Sprinklr's robust and cross functional Procurement Process.

Sprinklr endeavors to review potential areas of risk in relation to our business, and supplier relationships are subject to ongoing review. Sprinklr will continue to manage any identified risks by building on the principles included within Sprinklr's governance, and Sprinklr will not knowingly work with a supplier involved in (or suspected to be involved in) modern slavery or human trafficking.

Looking Ahead

We will continue to monitor and develop our practices in respect of combatting slavery or human trafficking. Sprinklr checks and tests the success of our commitments and works to ensure we meet our expectations.



Approval and Revision History

| Date | Approved By |
|--------------------|--------------------|
| August 20, 2019 | Legal |
| September 14, 2022 | Board of Directors |
| August 31, 2023 | Board of Directors |