

Anti-Human Trafficking

Policy

Policy #: POL0020336

Effective date: April 30, 2018

Version: 1.0

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1 Purpose of Policy

The U.S. Government has a zero-tolerance policy regarding trafficking in persons and has adopted a policy through regulations applicable to all government contractors and subcontractors. ServiceNow, Inc. (collectively with its subsidiaries, the “Company”, “we”, “our”) prohibits human trafficking and forced labor in all of its operations. In this regard, ServiceNow is committed to ensuring that employees, contractors, and subcontractors take appropriate measures to mitigate the risk of human trafficking and forced labor.

2 Scope of Policy

This Anti-Human Trafficking Policy (the “Policy”), which is an element of the Company’s Legal Compliance Policy, applies to all employees of the Company as well as non-employee members of our Board of Directors regarding their ServiceNow-related activities (the “Company Members”). Compliance with this Policy is mandatory for every Company Member. As used herein, references to “employee(s)” includes contingent workers. This Policy also covers Company partners, consultants, representatives, agents, and any other person or firm acting on behalf of the Company (collectively, “Company Partners”).

3 Definitions

The terms in this Policy shall be defined as follows:

- 1) “Commercial sex act” means any sex act on account of which anything of value is given to or received by any person.
- 2) “Debt bondage” means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.
- 3) “Forced labor” means knowingly providing or obtaining the labor or services of a person—
 - By threats of serious harm to, or physical restraint against, that person or another person;
 - By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
 - By means of the abuse or threatened abuse of law or the legal process.
- 4) “Involuntary servitude” means a condition of servitude induced by means of—
 - Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or
 - The abuse or threatened abuse of the legal process.
- 5) “Severe forms of trafficking in persons” means—
 - Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
 - The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

4 Policy

4.1 Questions

Please contact ServiceNow's Compliance Officer if you have any questions regarding the interpretation of this Policy.

4.2 Prohibited Conduct

In accordance with U.S. law, this Policy prohibits all Company Members and Company Partners from engaging in, or using labor recruiters, brokers, or other agents who engage in—

- 1) Severe forms of trafficking in persons during the period of performance of the contract;
- 2) The procurement of commercial sex acts during the period of performance of the contract; or
- 3) The use of forced labor in the performance of the contract.

This Policy also prohibits acts that directly support or advance trafficking in persons, including:

- Destroying, concealing, removing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
- Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the U.S. to the country from which the employee was recruited upon the end of employment if requested by the employee and required by applicable law;
- Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
- Charging recruited employees unreasonable placement or recruitment fees, such as fees equal to or greater than the employee's monthly salary, or recruitment fees that violate the laws of the country from which an employee is recruited;
- Providing or arranging housing that fails to meet the host country housing and safety standards;
- *If required by law or contract*, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements (where required by applicable law), grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

4.3 Reporting Obligations

Company Members and Company Partners should promptly report violations of this Policy, as appropriate, to their managers, the Human Resources Department, the General Counsel, ServiceNow's Compliance Officer, or anonymously through the ServiceNow whistleblower hotline.

It is the policy of the Company and the law to prohibit retaliation for reports of misconduct by others made in good faith by Company Members or Company Partners.

In accordance with our Whistleblower and Complaint Policy, you may submit a good-faith concern regarding potential violations of this Policy without fear of dismissal or retaliation. The Whistleblower and Complaint Policy is available on the Company’s internal website.

Company Members and Company Partners are expected to cooperate in internal investigations of misconduct.

4.4 Enforcement

ServiceNow intends to strictly enforce this Policy and violations may subject those working for ServiceNow to actions including, but not limited to, removal from work on a contract, reduction in benefits, or termination of employment. The United States, in turn, may suspend contract payments, reduce or eliminate award fees, terminate an impacted contract, or suspend or debar participants. The U.S. Government also may impose criminal penalties on persons who knowingly defraud recruits for purposes of employment under a U.S. Government contract.

5 Roles and Responsibilities

Role	Responsibility
Compliance Officer	Enforces this Policy
Company Members	All employees of the Company as well as our non-employee members of our Board of Directors must understand and adhere to this Policy.
Company Partners	All Company partners, consultants, representatives, agents, and any other person or firm acting on behalf of the Company, must understand and adhere to this Policy.

Table 1. Roles and Responsibilities

6 Document Control

Role	Name	Title
Author	Matthew Kelly	VP, Legal
Owner	Matthew Kelly	VP, Legal
QC Reviewer	Becky Trenary	Sr. Quality Manager
Approver	Robert Specker	General Counsel

Table 2. Document Control

7 Revision History

Revision	Date	Written/Updated by	Section(s)	Summary
1.0	April 19, 2018	Matthew Kelly	All	Initial version of document.

Table 3. Revision History

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