

## **SERVICENOW'S COMMITMENT AGAINST SLAVERY AND HUMAN TRAFFICKING**

Founded in 2004, ServiceNow delivers digital workflows that create great experiences and unlock productivity. We believe in the power of technology to reduce the complexity in our jobs and make work, work better for people. Our cloud-based platform and products streamline and simplify how work gets done. We are headquartered in Santa Clara, California, with subsidiaries and affiliates around the world.

### **SERVICENOW'S COMMITMENT TO ADDRESSING MODERN SLAVERY AND HUMAN TRAFFICKING**

At ServiceNow, we are committed to the highest standards of legal and ethical business conduct and we take these responsibilities extremely seriously. ServiceNow is a purchaser of goods and services which are required to operate our business. Our suppliers are a critical component of our operations. We therefore work closely with our business partners and suppliers to assess their supply chain practices to ensure that they reflect our ethical standards and values and to protect against modern slavery and human trafficking.

ServiceNow fully supports the elimination of modern slavery and human trafficking as set forth in the UN Declaration of Human Rights. As a global organization, we are committed to abiding by applicable laws and regulations, as well as doing our part to actively prohibit slavery and human trafficking within our influence, to include our business, business partners and supply chain.

ServiceNow's commitment to this charge is reflected in our comprehensive set of policies and procedures, including our [Code of Conduct and Ethics Policy](#) ("Ethics Policy"), which also summarizes our collective set of values for ServiceNow and its business partners. ServiceNow personnel are expected to uphold the human rights of anyone with whom we interact and to report suspected violations as established in our Ethics Policy and our Whistleblower and Complaint Policy. We consider the disclosure of such violations to be paramount in the fight against slavery and human trafficking and the efforts to eliminate such crimes.

### **HOW SERVICENOW EVALUATES AND ADDRESSES MODERN SLAVERY AND HUMAN TRAFFICKING RISKS**

ServiceNow evaluates our supply chain to identify any business partners and suppliers that pose risks for illegal or unethical behavior such as engaging in human trafficking, slavery or other human rights violations. Due to the nature of ServiceNow's operations and the jurisdictions in which we conduct business, ServiceNow considers our risk of modern slavery to be relatively limited, as our operating model does not involve intricate supply chains or dealings with multiple subcontractors, bar those suppliers essential to the operation of our business. Our supply chain remains largely unchanged from previous years. The majority of our suppliers and third-party business partners are large national and global companies with established governance structures and their own corporate social responsibility programs, including in relation to modern slavery. This affords ServiceNow some assurance in engaging in those commercial relationships.

ServiceNow has established the following initiatives, which involve a wide range of internal stakeholders responsible for procurement including supplier and partner operations, legal, and our compliance team, to help prevent forced labor, slavery, human trafficking and other human rights violations:

- ServiceNow requires its suppliers and partners to agree to the principles embodied within our Supplier Code of Conduct and Partner Code of Conduct respectively (the "Codes"). The Codes require suppliers and partners to comply with all applicable laws and regulations, including foreign and domestic labor laws and standards. The Codes also include provisions relating to human rights, labor standards, anti-corruption and health & safety. All suppliers and partners to ServiceNow are required to comply with the applicable Code in order to transact business with ServiceNow, and the failure of any supplier or partner to comply with the applicable Code may be grounds for termination. Suppliers and partners are also required to ensure that any subcontractors used while conducting business with ServiceNow follow standards that mirror those reflected in the Codes.

- ServiceNow also expects suppliers and partners to embrace ServiceNow's commitment to integrity and ethics. ServiceNow performs risk assessments on our suppliers and business partners to ensure due diligence is in place to assess, prevent and mitigate risks of modern slavery and human trafficking in our supply chain. As part of the due diligence process, ServiceNow's Vendor Risk Assessment ("VRA") program continually reviews and updates legal and ethical employment practices to assess and measure vendors, and all vendors who provide goods and/or services to ServiceNow are in scope of the VRA. The VRA is tailored to each vendor dependent on the level of inherent risk associated with the services offered. The VRA is assessed against four vendor categories, ranging from Very High to Very Low risk, with each category having different documentation and audit requirements. Further, re-certification of applicable vendors is required at a defined frequency based on risk. The VRA was updated during the reporting period to include enhancements and improvements on how vendor solutions architecture is reviewed, which now blocks activation of new vendors, or the issuance of purchase orders to existing vendors, until this review has been completed.
- The VRA also specifically covers risks in the supply chain relating to the use of sanctioned and restricted vendors. This is reviewed through a partner solution to ServiceNow's Vendor Risk Management solution. In addition, this solution reviews the financial, geopolitical and operational risks relating to suppliers and prospective suppliers. Further enhancements introduced during this reporting period include the additional screening of all vendors (both new and existing) against U.S. Denied Party lists to limit the risk of using sanctioned or restricted vendors.
- ServiceNow also operates a centralized procurement function which is ultimately controlled by the central procurement leadership team in our US headquarters in Santa Clara, California. This ensures that our risk mitigation systems and methods in relation to our suppliers are implemented consistently.
- ServiceNow has expanded our use of a third-party supplier ratings platform to provide corporate social responsibility assessments of our suppliers across our global network, including the UK. This ratings platform allows ServiceNow to track our suppliers' compliance with procedures relating to modern slavery and provides ongoing monitoring services that can report modern slavery, forced labor or human trafficking issues related to our suppliers to ServiceNow. No adverse findings have been identified through use of this platform. ServiceNow has also introduced an additional third-party supplier review platform which conducts comprehensive reviews of environmental, social, and corporate governance ("ESG") risks, which allows for greater ESG risk visibility earlier in the onboarding process, so that our sourcing and procurement teams can avoid high risk suppliers. This platform also provides an inherent risk rating in the onboarding app used by internal sourcing teams.
- ServiceNow personnel are trained at regular intervals on the principles embodied within ServiceNow's Ethics Policy and Global Procurement Policy (which includes the VRA), including annual refresher training for all employees, and a full training program included as part of the new-hire onboarding process for all new employees. In addition, our Vendor Risk team conduct regular internal training with our Strategic Sourcing and Procurement Operations teams and business unit owners. Furthermore, our Procurement team maintains an internal microsite on the VRA, and vendor risk matters generally. Importantly, ServiceNow employees are held accountable for their actions and are subjected to disciplinary action for failing to adhere to company standards.
- ServiceNow maintains a whistleblower hotline and has an investigation program that includes actual and suspected violations of the Ethics Policy and the Codes.
- ServiceNow ensures that our agreements with our contractors and suppliers include provisions requiring any subcontractors to comply with the contractual obligations under the contract between the immediate supplier/contractor and ServiceNow, which includes compliance with our Supplier Code of Conduct.

Each of the above processes are regularly reviewed and updated to ensure the ongoing effectiveness

of our compliance program at preventing modern slavery risks.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes ServiceNow's slavery and human trafficking statement for the fiscal year 2022, which ended on 31 December 2022. For further information about ServiceNow's commitment against anti-slavery and human trafficking, please contact the ServiceNow Compliance Team (legal\_compliance@servicenow.com) or ServiceNow's Ethics Hotline at:

<https://secure.ethicspoint.com/domain/media/en/gui/48988/index.html>.

This statement has been approved by the Board of ServiceNow UK Limited.

Date:

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*Mark Cockerill*

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Director, ServiceNow UK Limited