



Modern Slavery Policy Statement



CONCERNING THE FINANCIAL YEAR ENDING 31 JANUARY 2024

Databricks recognizes the modern trends and developments by governments and international organizations around the world to highlight the role that companies are expected to play in eradicating modern slavery and child labor by introducing relevant legislation, regulations, and guiding frameworks.

This statement was published in March 2024 in accordance with the UK's Modern Slavery Act 2015, Australia's Modern Slavery Act 2018 (Cth), and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, to set out the steps taken in Databricks' fiscal year ending 31 January 2024 by Databricks, Inc., and its covered subsidiaries¹ (collectively, '**Databricks**') to effectively assess and manage its modern slavery and child labor risks and strive to ensure that no form of modern slavery or child labor is taking place in its operations. This statement was prepared by the Databricks legal team, in consultation with key areas of the group's business.

About Databricks

Databricks is a data and AI company. With origins in academia and the open source community, Databricks was founded in 2013 by the original creators of Apache Spark™, Delta Lake, and MLflow. As of 31 January 2024, more than 10,000 organizations worldwide rely on the Databricks Data Intelligence Platform to unify their data, analytics, and AI. Databricks is on a mission to help data teams solve the world's toughest problems.

Modern Slavery and Child Labor

'Modern slavery' is a term that encompasses issues such as people trafficking, forced labor, domestic servitude, slavery, and other forms of human exploitation. 'Child labor' refers to labor or services provided by persons under the legal minimum age established in national legislation and which deprives children of their childhood, their potential, and their dignity and is harmful to their physical and mental development.

Databricks' values have always been central to everything we do. The board of directors and management of Databricks, Inc., together with its worldwide subsidiaries, are committed to a work environment and supply chain that are free from human trafficking, slavery, child labor, and other practices inconsistent with global human rights standards.

Business Structure and Operations

Databricks is headquartered in San Francisco, California, with offices and hundreds of partners and suppliers around the world, including in Europe, the Americas, and Asia-Pacific. As of 31 January 2024, Databricks had more than 20 offices in 12 countries and employed over 6,000 employees worldwide in 19 countries.

1. Databricks subsidiaries covered by this statement include Databricks Australia Pty. Ltd. ('**Databricks Australia**'), Databricks Canada ULC ('**Databricks Canada**'), Databricks International Holdings, Inc. ('**Databricks International**'), and Databricks UK Limited ('**Databricks UK**').

The operations of Databricks UK, Databricks Australia, and Databricks Canada primarily consist of sales and marketing support services, with Databricks, Inc., also selling directly into each country. As of 31 January 2024, Databricks employed 392 employees in the United Kingdom, 154 employees in Australia, and 138 employees in Canada. Databricks, Inc., is the parent company of Databricks Australia, Databricks Canada, and Databricks International, which in turn is the parent company of Databricks UK, each of which is covered by this statement.

Databricks, Inc., does not consult each of its subsidiaries with respect to modern slavery and child labor, because each subsidiary operates on the same business model as Databricks, Inc., and the procurement of supplies for all subsidiaries is generally managed by Databricks, Inc. In the event business operations change materially for a Databricks, Inc., subsidiary, Databricks, Inc., will consult with the relevant subsidiary to identify and review any additional compliance and regulatory risks, including with respect to modern slavery and child labor.

Supply Chain and Risks

Databricks does not have a complex supply chain, and the vast majority of our partners and suppliers² are technology and service vendors supplying consulting services, SaaS subscriptions, cloud services, and marketing services. Only a small percentage of Databricks' suppliers and partners provide hardware or physical services, and those are typically large national and global companies with established governance structures and their own corporate social responsibility programs, including in relation to modern slavery and child labor. This affords Databricks some assurance in engaging in those commercial relationships.

Overall, due to the nature of Databricks' business and taking into account modern slavery and child labor risk factors, we have determined that our modern slavery and child labor risk is low. Nevertheless, we recognize such risks can exist for organizations across the globe, especially with regard to product manufacturing and physical operating requirements, and we continue to review our risk assessments, supply chain selection, management processes, and policies with that in mind.

Due Diligence

We expect our vendors to comply with our Third Party Code (as defined below), which requires them to conduct their business with integrity, which includes complying with applicable local, state, national, and international laws and regulations and respecting human rights. When Databricks engages with new vendors, we conduct a vendor risk assessment and determine whether additional due diligence is needed with respect to legal and compliance matters. Our vendor relationships remain subject to ongoing review, and if we become aware of violations of our Third Party Code (as defined below), we will seek an appropriate response up to and including termination of vendor relationships and reporting information to relevant authorities.

2. Measured by amount of spend on an annual basis.

Our Policies and Training:

GLOBAL CODE OF CONDUCT

Databricks' policies and position statements support human rights and labor standards, and these are integrated into our business. Databricks has adopted a Global Code of Conduct ('Code') which sets the baseline for the ethical standards and behaviors we expect from our employees. It also sets out our policies around speaking up, ethical and responsible behavior, culture, integrity, working with government entities, communications, partnerships, and contracting. Databricks also has standalone policies covering matters such as procurement, anti-bribery and corruption, background checks, health and safety, discrimination, harassment, and retaliation, all of which are referenced in the Code. The Code and this statement are publicly available on the Legal Compliance & Ethics page of the databricks.com website, and referenced in our online customer terms.

Databricks' employees are required from time to time to attend training on and/or certify to our Code and other relevant topics, to help Databricks employees understand that Databricks does not condone or engage in slavery, servitude, or unfair employment practices.

Databricks also educates employees to expect third parties to follow Databricks' Third Party Code of Conduct, described below.

THIRD PARTY CODE OF CONDUCT

In February 2023, Databricks published a global Third Party Code of Conduct ('Third Party Code') to establish its expectations and requirements for third parties who do business with Databricks. The Third Party Code explains that all of Databricks' partners, suppliers, vendors, contractors, consultants, and agents are expected to abide by the same compliance behaviors that Databricks requires of employees – to act with integrity, play by the rules, and speak up (each further described in the Third Party Code).

In addition, consistent with Databricks' Anti-Slavery & Human Trafficking Policy and the U.N. Guiding Principles on Business and Human Rights, the Third Party Code specifically identifies that third parties must prohibit slavery and child labor and all forms of practices inconsistent with basic human rights.

The Third Party Code is publicly available on the Legal Compliance & Ethics page of the databricks.com website and is further cross-referenced in the Global Code of Conduct referenced above. The existence of the Third Party Code was communicated internally to all employees upon its launch and is reinforced in periodic risk-based trainings for employees who work with third parties.

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Databricks will not tolerate or condone human trafficking, slavery, or child labor, or any other similar practices, in any part of our global organization. It is for this reason that the Databricks Anti-Slavery & Human Trafficking Policy has been adopted and forms part of the Code, which policy is consistent with our core values to protect and advance human dignity and human rights in our global business practices and supply chains.

Databricks believes that compliance with the Code, including the Databricks Anti-Slavery & Human Trafficking Policy, will positively contribute to the performance of the organization as a whole.

This Modern Slavery Policy Statement and the Anti-Slavery & Human Trafficking Policy will be reviewed at least once each fiscal year and amended as necessary, including in the event of any significant changes to applicable legislation.

SPEAK UP PROGRAM

Databricks maintains a Speak Up program to encourage its employees to promptly report any suspected or actual violations of laws, rules, regulations, or internal Databricks codes and policies. The Speak Up program provides an avenue for confidential or anonymous reporting and prohibits retaliation against anyone who reports a good-faith concern or suspected violation, or against anyone who participates in an internal investigation. No instances of modern slavery or child labor were noted or reported through this program during the fiscal year ending 31 January 2024.

Assessment of Policies and Effectiveness

We recognize the need to continually review the effectiveness of our policies and practices in preventing slavery, human trafficking, and child labor within our business and our supply chains. We do not currently have in place any key performance indicators to measure the effectiveness of the steps being taken, but we will continue to monitor risks, and develop and continuously improve on our approach.

This Databricks Modern Slavery Policy Statement was approved by the board of directors (or an authorized committee of the board of directors) of Databricks, Inc., on 14 March 2024, for the period 1 February 2023 to 31 January 2024.

Signed for and on behalf of Databricks, Inc.

Ali Ghodsi