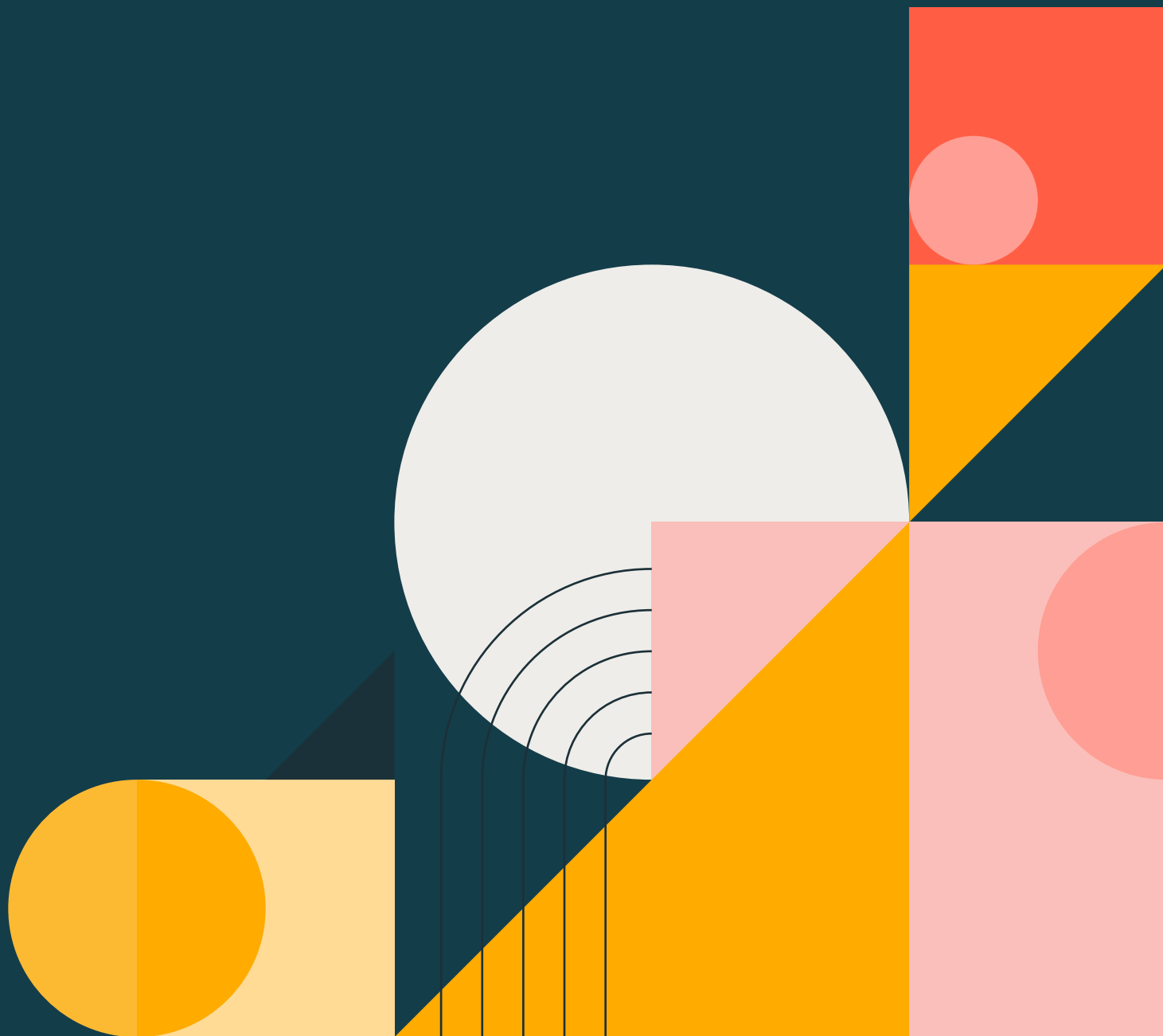
databricks

Modern Slavery Policy Statement



CONCERNING THE FINANCIAL YEAR ENDING 31 JANUARY 2023

Databricks recognizes the modern trends and developments by governments around the world to highlight the role that companies are expected to play in eradicating modern slavery by introducing modern slavery legislation, regulation, and guiding frameworks (**'Modern Slavery Legislation'**).

This statement was published in March 2023 in accordance with such Modern Slavery Legislation by Databricks, Inc., to set out the steps taken in Databricks' fiscal year ending 31 January 2023 by Databricks, Inc., and its worldwide subsidiaries (including without limitation Databricks U.K. Limited) (**'Databricks'**) to effectively manage its modern slavery risks and strive to ensure that no form of modern slavery 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 the lakehouse 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. More than 9,000 organizations worldwide rely on the Databricks Lakehouse Platform to unify their data, analytics and AI. Databricks is on a mission to help data teams solve the world's toughest problems.

What Is Modern Slavery?

'Modern slavery' is a term that encompasses issues such as people trafficking, forced labor, domestic servitude, slavery, and other forms of human exploitation. 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 and slavery, and other practices inconsistent with global human rights standards.

Operations, Supply Chain and Risks

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. Databricks had more than 20 offices in 12 countries and employed over 5,000 employees worldwide in 19 countries as of the fiscal year ending 31 January 2023. Databricks does not consult each of its subsidiaries with respect to modern slavery, because each subsidiary operates on the same business model as Databricks and the procurement of supplies for all subsidiaries is managed by Databricks. In the event business operations change materially for a Databricks subsidiary, Databricks will consult with the relevant subsidiary to identify and review any additional modern slavery risks.

Databricks does not have a complex supply chain, and the vast majority of our partners and suppliers, measured by spend, are technology and service vendors supplying consulting services, SaaS subscriptions 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. 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 risk factors, we have determined that our modern slavery 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

The vast majority of Databricks' partners and suppliers, measured by spend, are technology and service vendors supplying consulting services, SaaS subscriptions and marketing services, as stated above. When Databricks engages with new technology vendors, we conduct a vendor risk assessment and determine whether additional due diligence is needed with respect to data privacy, security and other legal and compliance matters.

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 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. Upon its launch, the existence of the Third Party Code was communicated internally to all employees.

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Databricks will not tolerate or condone human trafficking or slavery, 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 and demonstrate our support for the aims of the Modern Slavery Legislation.

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 the legislation.

Assessment of Policies and Effectiveness

We recognize the need to continually review the effectiveness of our policies and practices in preventing slavery and human trafficking 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 is approved by the board of directors (or an authorized committee of the board of directors) of Databricks, Inc., on 15 March 2023 for the period 1 February 2022 to 31 January 2023.

Signed for and on behalf of Databricks, Inc.

Ali Ghodsi
Director and Chief Executive Officer
Date: 15 March 2023