



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE CEO

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which deprive victims of their liberty and exploit them for personal or commercial gain. Palantir Technologies does not tolerate modern slavery or human trafficking in our business operations or those of our suppliers.

ORGANIZATIONAL STRUCTURE

Palantir Technologies Inc. and its affiliates (together, “Palantir”) provide data management and analysis software to customers across the public and private sectors. We employ more than 2000 people in over 10 countries, with headquarters in Palo Alto, CA, USA. Our clients include financial services, law enforcement, military, intelligence, and manufacturing organizations across the globe. We also provide our software and services to non-profit organizations that combat modern slavery and human trafficking.

OUR SUPPLY CHAINS

Our supply chain consists primarily of professional and office services and office goods. Professional service suppliers include consultants in various fields, travel agents, and outside legal counsel. Office services suppliers include, for example, delivery services, catering, maintenance, repair, and cleaning services. Office goods suppliers include, for example, computer hardware and software, copiers, telephone, office furniture and fixtures, office supplies, and related goods.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

We believe the risks of slavery and human trafficking practices directly within our business are very low. Our business is sophisticated software development that does not involve the type of labor often associated with such practices. Our office services suppliers are engaged in a range of activities, from higher skilled to lower skilled, but almost all are engaged in services conducted in close proximity to or in close cooperation with Palantir personnel. Consequently, these services are conducted in a professional environment where exploitive practices would be difficult, if not impossible, to hide. Our suppliers of office goods are reputable retailers and wholesalers. We do not contract with source suppliers based in industries or regions of the world where the risks of modern slavery and human trafficking are relatively high.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Our workplace policies and procedures demonstrate our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure our supply chains are entirely free from slavery and human trafficking.



SUPPLIER ADHERENCE TO OUR VALUES

Within our workplace, we enforce policies and procedures to ensure that we act ethically and with integrity in all our business relationships. We also implement and enforce effective systems and controls to ensure our supply chains are entirely free from slavery and human trafficking, and we are adding the following supply chain-specific elements to our compliance program:

- Internal Training for procurement and sales personnel
- Dedicated Reporting Channels
- Supplier Agreement Clauses to require Modern Slavery Act adherence and reporting

We have a dedicated compliance team that assists procurement and sales teams on issues relating to slavery and human trafficking.

REPORTING AND TRAINING

All personnel have access to internal channels for reporting suspected incidents of modern slavery and human trafficking, including in-person access to Palantir's compliance team and an anonymous reporting system.

To ensure that Palantir personnel engaged in sales or procuring goods and services from third parties understand the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training annually.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Palantir's slavery and human trafficking statement for the previous financial year (FY18). Although subject to review annually, the statement will also apply to subsequent fiscal years unless and until withdrawn, superseded, or modified.

Dr. Alexander Karp, CEO
Palantir Technologies Inc.

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