

Our Code of Conduct

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Introduction

Forward

At Anaplan, we do what's right. We understand the importance of doing business the right way – for our employees, contractors, consultants, suppliers, agents and our customers.

Our Code of Conduct (“the Code”) is how we ensure we have a comprehensive understand of what's right. It's one of the ways we put our Values into practice. The Code details the behavioral expectations, protocols for the protection and appropriate use of company property, emphasizes open communication, professionalism, respect, and adherence to laws, while also outlining potential disciplinary actions for violations.

It can help you:

- Conduct yourself honestly and ethically
- Uphold our values and protect our reputation
- Understand what Anaplan expects from you
- Make good decisions every day
- Comply with the laws, regulations, and standards that apply to our company
- Understand where to go for assistance or guidance if you have questions

Take time to familiarize yourself with our Code. Encourage others to do so as well. Then, refer to it regularly when you are making business decisions, have a question about how to handle a situation or want to better understand what good behavior looks like at Anaplan.

Thank you for doing your part to ensure Anaplan does what's right.

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Introduction from CEO, Charles Gottdiener

At Anaplan, our Winning Culture is underpinned by eight core values that define who we are, how we behave, and the way we operate. We are innovative, accountable, collaborative, transparent, resilient, empathetic, authentic and learners. I ACT REAL, an acronym for all our values, is—a simple and affirmative statement that guides how we act so we can succeed as individuals, as a team, with our partners, and for our customers.

While each of our values are equally critical to our culture and our business, transparency and accountability are foundational to how we act ethically and operate with integrity. By doing what we say we are going to do and communicating openly with clarity and honesty, we earn and maintain the trust of all our stakeholders, which is central to our collective success.

In many situations, doing the right thing is clear. As we continue our journey to become a category-defining company, new and more complex situations will arise. This Code of Conduct provides you with a framework for how to navigate these situations so that we each remain aligned with our values, uphold our commitments, and follow high ethical standards in any circumstance. It also ensures that as a company, we always manage our business with excellence and integrity.

We expect each of you to act with good judgement and to read, understand and comply with our Code of Conduct. Knowing the code helps us all foster an inclusive and productive environment at Anaplan. Everyone working on behalf of Anaplan - employees, contractors, consultants, suppliers, and agents is expected to uphold these norms, rules and responsibilities. You are encouraged to ask questions, use your voice and promptly report all concerns. We ask each of you to think about the requirements in the Code and how to apply them in your daily work.

In a nutshell, here, we do what's right.

Read the Code.

Live it.

Come back to it whenever you have a question or concern.

When we all do this, our Winning Culture will be at its best and we will be better positioned to achieve our Roadmap for Profitable Growth strategy.

Regards,

Charles E. Gottdiener



Innovative | Accountable | Collaborative | Transparent | Resilient | Empathetic | Authentic |
(a)Learner

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Upholding our Code of Conduct

We act Responsibly

Our Code of Conduct (the “Code”) provides the resources to guide us in making responsible decisions. All Anaplan employees and contractors must read, understand, and comply with our Code, and all other applicable policies and guidelines. Anaplan also expects its contractors, consultants, vendors, suppliers, and agents to abide by the Code in connection with their work for the Company.

As a global company, Anaplan is subject to many international laws and regulations. We follow all applicable international, federal, state and local laws, rules, and regulations.

We Speak up and ask questions

Following the Code and the law is only a starting point of our responsibilities; we also have a duty to speak up if we witness or suspect that there has been a violation of the law, the Code, or Anaplan policies. If you suspect or witness a violation of the law, the Code, or Anaplan policies, you must promptly report any violations or suspected violations to any of the following options: your manager, [the People Team](#), the Legal Department or through our [Compliance Hotline](#). To make a report anonymously, contact the Compliance Hotline at 1-844-823-8923 or online at <http://anaplan.ethicspoint.com>. For more information, refer to Anaplan’s [Compliance Reporting Policy](#).

In some locations outside of the United States, anonymous reporting of certain types of issues may not be allowed by local law. If local law prohibits or restricts anonymous reporting, you should reveal your identity when making a report. In those situations, your identity will be kept confidential (unless prohibited by local law) and you will have the right to access and modify your report. If you are in doubt about the requirements of your local law, please contact the Legal Department at legalcompliance@anaplan.com.

In upholding the Code, you may also encounter situations where you have a question or are unsure of the best course of action. If you have any questions or concerns about the Code, any Anaplan policy, or the law, please contact your manager, [the People Team](#), or the Legal Department for answers.

We take action

We take our responsibility to uphold the Code seriously. If necessary, we will investigate any reports of violations of the law, the Code, or Anaplan’s policies promptly, completely, and thoroughly. Employees must cooperate completely in any investigation, by being honest, cooperative, and forthcoming with information. Misrepresenting facts, failing to provide information, or obstructing an investigation is strictly prohibited, and can lead to discipline, up to and including employment termination. If you have any questions or concerns about participating in an investigation, please contact the Legal Department at legalcompliance@anaplan.com.

We prohibit retaliation

People managers have a special duty to lead by example. People managers must foster an environment where employees are comfortable reporting their concerns. Anaplan strictly prohibits retaliation against employees who report any violation or perceived violation of the Code, the law, or any other Anaplan policy

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or guideline. If you believe that you or another employee has been retaliated against for speaking up or cooperating with an investigation, you must report it to the Legal Department, the [Compliance Hotline](#), or [the People Team](#).

Failure to comply with the law, the Code, or any other Anaplan policy or guideline may lead to discipline, up to and including employment termination.

Respecting and including others

We treat others fairly and respectfully

We foster a respectful work environment free from any form of discrimination, harassment, retaliation, and intimidation. We do not tolerate discrimination, harassment, violence, or threatening behavior of any kind. We always treat everyone—fellow employees, customers, partners, and other stakeholders—with integrity, dignity, honesty, fairness, and respect at all times.

We do not discriminate in any employment decision and strictly prohibit discrimination based on race, religion, color, national origin, ancestry, sex, sexual orientation, gender, gender identity or expression, genetic information, age, disability, medical condition, marital status, military or veteran status, or any other classification protected by applicable local, state, federal, or applicable international laws.

We do not tolerate harassment including harassment that is verbal, on social media, physical, visual, or sexual in nature. Prohibited harassment can take many forms including intimidation, racial slurs, sharing inappropriate or offensive material, or making sexual jokes, comments, or requests.

If you see, suspect, or experience conduct that you believe is prohibited harassment or discrimination, you may contact your manager, [the People Team](#), the Legal Department or report the conduct through the [Compliance Hotline](#) at +1 844-823-8923 (other local country phone numbers are available online) or online at <http://anaplan.ethicspoint.com/>.

We honor human rights

We respect human rights, provide fair working conditions, and prohibit the use of any slavery, servitude, forced, compulsory, or child labor and human/sex trafficking by Anaplan or any organization affiliated with Anaplan, including our partners and suppliers.

We are committed to a safe and healthy workplace

We are committed to providing a clean, safe, healthy, secure, and drug-free workplace. Our employees have the responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices.

We do not tolerate violence and/or threatening behavior. We do not allow weapons of any kind on company property or while conducting company business, even if you are licensed to own or carry a weapon.

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We operate video surveillance systems at our office locations for the purpose of maintaining a safe work environment and protecting company property. The video is not intended to monitor work performance and is not used in areas such as restrooms, locker rooms, changing areas, and shower facilities or as otherwise prohibited by law. Please see the Anaplan Monitoring Policy for further information.

We may also monitor company provided or authorized computers, telephones, email, voicemail, internet, and other communications in order to carry out legal obligations as an employer or for legitimate business reasons, such as protecting the security of our IT systems, network management, record keeping, or for protection of confidential information and other company assets. You should have no expectation of privacy in using these systems. Please see Anaplan's Acceptable Use Policy for further information.

Unless you have obtained prior approval from the Legal Department, you must not record - photo, video, audio- any employee while that employee is working or otherwise conducting business, a customer, partner, or competitor without that person's knowledge and consent.

We do not work under the influence of drugs or alcohol

We do not permit the use, possession, sale, or being under the influence of any illegal substance at Anaplan or when representing Anaplan in any capacity or conducting Anaplan business. We are expected to act responsibly and in a professional manner at all work-related events and employees must ensure their judgment and performance at work are never impaired by alcohol or drugs.

We must take responsibility for immediately reporting accidents, injuries and unsafe conditions, hostile behavior or weapon possession. If you or anyone else is in immediate danger, you should immediately contact local law enforcement.

We respect the environment

We conduct our business in an environmentally responsible and sustainable manner. We are committed to complying with all applicable environmental laws and participating in voluntary disclosures in support of our corporate objectives. We are committed to helping our customers meet their environmental, sustainability, and corporate social responsibilities.

Operating openly and without self-interest

We avoid conflicts of interest

We have a responsibility to make sound business decisions strictly on the basis of Anaplan's best interests without regard to our personal interests. A conflict of interest can occur when our personal activities, investments, or associations compromise our judgment or ability to act in the best interest of Anaplan. We

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avoid conflicts of interest, or even the appearance of a conflict of interest. A conflict of interest may exist in, but is not limited to, the following situations:

- Purchasing equipment, supplies, or services for Anaplan
- Purchasing, selling, or leasing property for Anaplan without authorization
- Receiving gifts, entertainment, loans, or preferential investment opportunities
- Using confidential information
- Personal relationships where either party may benefit

You must also never use Anaplan property, assets, or information that comes to you because of your work for personal use, gain or advantage. We must not take for ourselves or immediate family members any opportunities that are discovered through the use of Anaplan property, information, or position to compete with Anaplan in any way. We owe Anaplan a duty to advance its legitimate business interests when commercial opportunities arise.

You must disclose any relationships, associations, or activities that may create actual, potential, or perceived conflicts of interest to your manager, [the People Team](#), or Anaplan's Legal Department at legalcompliance@anaplan.com.

as soon as you become aware of any actual or potential conflict. After you disclose any potential conflicts, it will go through a compliance review. Failure to disclose a possible conflict of interest may result in discipline, up to and including, employment termination.

We are careful when engaging in outside employment and activities

We disclose any employment or activities outside of Anaplan so that we can determine whether there is an actual, potential, or perceived conflict of interest.

During your employment with the Company, you shall devote your full business efforts and time to the Company; however, you may serve on corporate, civic or charitable boards or committees, deliver lectures, fulfill speaking engagements, teach at educational institutions, or manage personal investments provided that such activities do not individually or in the aggregate interfere with the performance of your duties to the Company or create any actual, potential, or perceived conflict of interest with the Company.

If you participate in any of the above activities in your personal capacity, you must remove yourself from discussion or voting on any matter that may involve Anaplan or our competitors to avoid conflicts of interest. If your participation in these organizations occurs during work time, you must either use volunteer days or get your supervisor's approval.

You must disclose and request prior approval from [the People Team](#) or the Legal Department for your intended participation in corporate, civic or charitable boards or committees, to deliver lectures, fulfill speaking engagements, or teaching at educational institutions. Failure to disclose outside employment for conflict of interest review may result in discipline, up to and including employment termination.

We follow the law regarding political contributions

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Corporate political campaign contributions are regulated by federal, state, and local law in the United States, as well as various jurisdictions internationally. Personal contributions must be kept separate from the company and you must not refer to your employment with Anaplan or use Anaplan's assets to make your personal contributions. You must never reimburse someone for any political contribution with Anaplan funds.

We avoid conflicts in our outside financial opportunities

Holding interest or transacting business in a company's securities or derivatives of those securities may create a conflict of interest if you conduct or supervise Anaplan related business for that company. You must disclose your financial interests to the Legal Department at legalcompliance@anaplan.com before conducting any business with that company.

Protecting Anaplan's reputation

We are accountable

We operate with accountability and transparency and hold ourselves to the highest standards of ethical conduct in all our business interactions. We keep our commitments to each other, to our customers, and to our partners. We endeavor to communicate with our customers, partners, fellow employees and suppliers in an honest and unambiguous way. We avoid making any misstatements of fact, making misleading or exaggerated communications, or creating false impressions. We may make mistakes, but we quickly admit and correct them.

We do not permit bribery or corruption

Anaplan's policy against bribery and corruption is clear—we never make or accept bribes, kickbacks or facilitation payments or similar corrupt transactions to advance our business. Bribes are anything of value offered or given to improperly influence a decision.

We do not offer, promise, or give anything of value to anyone, whether they are a government official or not, if the exchange might create the appearance of impropriety or is intended to influence a person's judgment, regardless of the norms of local custom. We never offer, promise, or give anything of value to anyone for an improper or corrupt purpose. This includes gifts or entertainment purchases. For more information, refer to Anaplan's Anti-Corruption and Bribery Policy and our Travel and Expense Policy, which we must all review and strictly adhere to.

If you are ever offered a bribe, you must report it to the Legal Department immediately.

We compete in the marketplace in a fair and lawful manner

We are committed to complying with antitrust and competition laws in all the countries and jurisdictions in which we operate.

We deal fairly with our competitors and never engage in dealings that would fix, control pricing, allocate markets or customers, or otherwise violate antitrust laws and regulations. We strictly prohibit anyone at

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Anaplan from colluding with a competitor. When interacting with a competitor, questions about whether our actions are proper and in compliance with the law should be directed to our Legal Department.

We do not deceive customers, suppliers, competitors, employees, or the public. We never make false representations about Anaplan's products or services. We never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair dealing.

We use common sense when selecting business partners, and we always use a selection process that is fair, lawful, and complies with all of our policies, including the Code. We put all business partnerships in writing and obtain all appropriate approvals for these partnerships.

We maintain accurate and complete business records

We create and maintain truthful information in accordance with applicable legal requirements and generally accepted accounting practices. We do not tolerate the falsification or improper alteration of any business record.

If we identify any mistakes or discrepancies, no matter how small, in any record, we must work to resolve the issue immediately. All mistakes or errors must be reported to our supervisors.

We never direct anyone to create a false or inaccurate record, including withholding information from someone preparing the record or otherwise act in a fraudulent manner.

We comply with international trade laws and export controls

Export control laws of the United States govern exports of software, technology, and technical data from the United States. Business dealing with certain countries, entities, and foreign persons are also prohibited by U.S. laws. The countries in which we operate also have legal requirements around international trade that cover imports or exports, and in some cases, specific licenses may be required. We comply with applicable international trade laws and controls including the Export Administration Regulations issued by the U.S. and we do not engage in business with certain countries subject to U.S. government economic sanctions.

International trade compliance is a complex undertaking, and you must contact the Legal Department before engaging in export or import activities.

We avoid misconduct that could harm Anaplan's reputation

We avoid on or off the job misconduct that could harm Anaplan's reputation or prevent us from doing our jobs.

We are careful when representing Anaplan

We represent Anaplan to the public only when authorized.

We use social media wisely, appropriately, and responsibly. We never use social media to bully. We never use social media to share confidential company information or the confidential information of our customers, suppliers,

business partners, or other employees. For more information, refer to Anaplan's Social and Digital Media Policy.

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If the media contact you, you must refer them to Corporate Communications unless your job description dictates you interact with the media.

Protecting Anaplan's assets

We safeguard Anaplan's intellectual property and assets

Anaplan's assets include its intellectual property rights, information systems, computers, servers, and other equipment. We use Anaplan's assets efficiently and only for legitimate business purposes, and in a responsible manner. You should have no expectation of privacy when using Anaplan's assets, equipment or systems.

We are required to protect all of Anaplan's assets, as well as any property belonging to customers, business providers, and co-workers.

Our intellectual property and the intellectual property of anyone else – customers, competitors, or business partners - must not be inappropriately disclosed or misused. If you suspect that someone has disclosed or misused any intellectual property, you must report it immediately to the Legal Department.

Anaplan property must never be taken, sold, loaned, intentionally damaged, or otherwise disposed of whether or not for personal gain. We never leave Anaplan property unattended in public places.

Anaplan staff shall report lost or stolen equipment (cell phones, laptops, tablets, or any media such as memory sticks containing Anaplan data) to security@anaplan.com immediately.

We protect confidential information

We do not disclose or distribute confidential, proprietary, and private information of our employees, customers, partners, and others with whom we do business. This includes financial and operational information about our customers submitted in connection with use of our platform.

We use confidential information only for legitimate business purposes. We do not share confidential information with anyone who does not have a need to know for a legitimate business or legal reason.

We ensure that confidential information is not left in plain sight. Equipment containing confidential information will be locked away whenever it is not in use. We lock all of our devices such as cell phones, laptops, tablets, and PCs when we are away from such device(s).

We protect data in our possession

We protect the confidential, proprietary, and private information of our employees, customers, partners, and with others with whom we transact business. You must familiarize yourself with the Classification of Information Policy on our intranet and protect data according to the policy.

We treat all employee, customer, partner, and Anaplan proprietary information as confidential, sensitive, and restricted. We never access confidential information unless we have a legitimate business reason.

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We protect Anaplan's network, laptops, mobile phones, and other equipment that might have access to confidential, restricted, or proprietary data, and never store sensitive or confidential information on personal or other non-Anaplan equipment or unapproved applications.

For more information, refer to Anaplan's Acceptable Use Policy, Classification of Information Policy, Staff Privacy Notice, Information Security and Privacy Policy, Human Resources Security Policy, Records Retention and Destruction Policy, Compliance Policy, Customer Data Protection Policy, and Business Data Retention Policy.

Owning our continued promises

We have obligations to Anaplan even after our employment ends. We all sign a Proprietary Information and Inventions Agreement, Confidentiality Agreement, and/or Non-Disclosure Agreement at the time we are hired. Those requirements remain in place after we leave Anaplan.

We must return all Anaplan property in accordance with the instructions we are given at the time we separate from Anaplan. All property includes all data, information, physical equipment, and anything else that was provided in the course of your work.

Getting help

The Anaplan Legal Department is responsible for the administration of this Code. No one is exempted from any part of the Code unless there is an exemption in writing. Any exemption for a Board Member or executive officer requires Board approval and must be disclosed. All other waivers require the approval of the Chief Legal Officer.

Anaplan maintains other policies and guidelines that provide further information on the topics contained in the Code or that address specific areas not covered by the Code. You can access the policies noted in the Code on our internal intranet site - the Barn, as well as request copies from your manager or Human Resources.

We sometimes find ourselves in situations that have not been addressed in the law, the Code, or other Anaplan policies or guidelines. When this happens, our Values guide you to take ownership and act with a high standard of integrity. If you have any questions or need guidance, you can ask your manager, [the People Team](#), or the Legal Department. You never have to figure out how to handle a complex situation alone. We are always here to help.

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