

The Anaplan logo, featuring a stylized 'A' icon followed by the word 'anaplan' in a lowercase, sans-serif font.

# Our Code of Conduct and Ethics

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#AnaplanLOVE

Live Our Values Everyday



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## Introduction

Anaplan is a leading provider of enterprise cloud software, empowering organizations across industries to see, plan and lead better business outcomes. Our Connected Planning platform enables leaders to align their strategic objectives and resources, make bolder decisions and drive faster results. At Anaplan, we are committed to delivering continuous innovation and an exceptional customer experience while fostering a culture of inclusivity and accountability. Our values represent the key behaviors that underpin our winning culture which is critical to Anaplan's success.



**I ACT REAL**

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



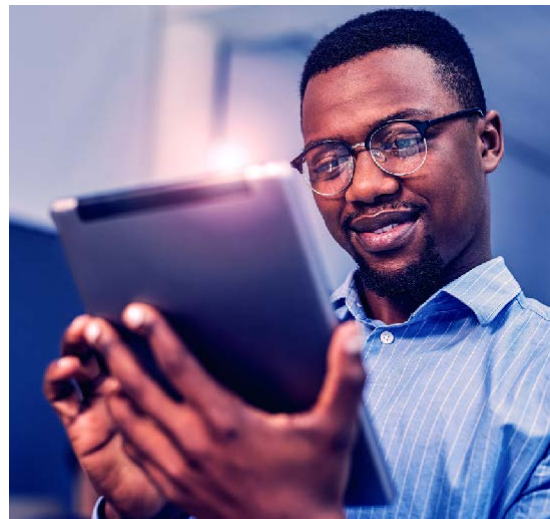


# 1. We LOVE by upholding our code of conduct

## 1.1 We make A-shaped decisions

Our Code of Conduct and Ethics, (the “Code”) provides the resources to guide us in making A-shaped 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, 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.



## 1.2 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, Human Resources, 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 [anaplan.ethicspoint.com](http://anaplan.ethicspoint.com). For more information, refer to Anaplan’s Compliance Reporting Policy on the Barn.

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](mailto: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, Human Resources, or the Legal Department for answers.

## 1.3 We take action

We take our responsibility to uphold the Code seriously. 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](mailto:legalcompliance@anaplan.com).

## 1.4 We prohibit retaliation

People leaders have a special duty to lead by example. People leaders 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 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 Human Resources.

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.



## 2. We LOVE by respecting and including others

### 21 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 bullying, 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, Human Resources, the Legal Department or report the conduct through the Anaplan Ethics Hotline at +1 844-823-8923 (other local country phone numbers are available online) or online at <http://anaplan.ethicspoint.com>.

### 22 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 in Anaplan's supply chain.

### **23 We are committed to a safe and healthy workplace**

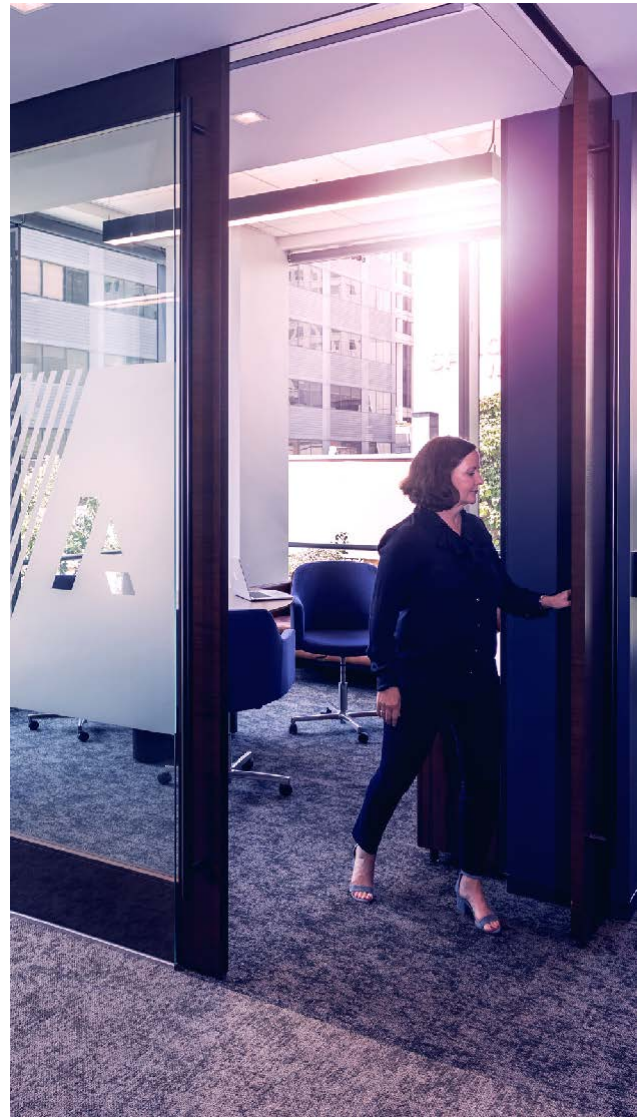
We are committed to providing a clean, safe, healthy, secure, and drug-free workplace. Our employees have the responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices.

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.

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.

We may also monitor company provided 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.

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.



### **24 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.

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.

### **25 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 responsibility objectives as a Software-as-a-Service supplier.



### **3. We LOVE by operating openly and without self-interest**

#### **3.1 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 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 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, Human Resources, or Anaplan's Legal Department at [legalcompliance@anaplan.com](mailto: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 Compliance Review. Failure to disclose a possible conflict of interest may result in discipline, up to and including employment termination.

#### **3.2 We are careful when engaging in outside employment or 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 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.

Failure to disclose outside employment for conflict of interest review may result in discipline, up to and including employment termination.

#### **3.3 We follow the law regarding political contributions**

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.

#### **3.4 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](mailto:legalcompliance@anaplan.com) before conducting any business with that company.

## **4. We LOVE by protecting Anaplan's reputation**

### **4.1 We are accountable**

We operate with accountability, transparency and integrity and hold ourselves up 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.

### **4.2 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 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.

### **4.4 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 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. 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.

### **4.3 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.



#### **44 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.

#### **45 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.

#### **46 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 Media Guidelines or Anaplan's Marketing Department.

If the media contact you, you must refer them to Public Relations unless your job description dictates you interact with the media. For more information, refer to the Social Media Guidelines.



## 5. We LOVE by protecting Anaplan's assets

### 5.1 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.

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](mailto:security@anaplan.com) immediately.

### 5.2 We protect confidential information

We do not disclose or distribute the confidential, proprietary, and private information of our employees, customers, partners, and others with whom we do business. This includes financial and operational information of 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).

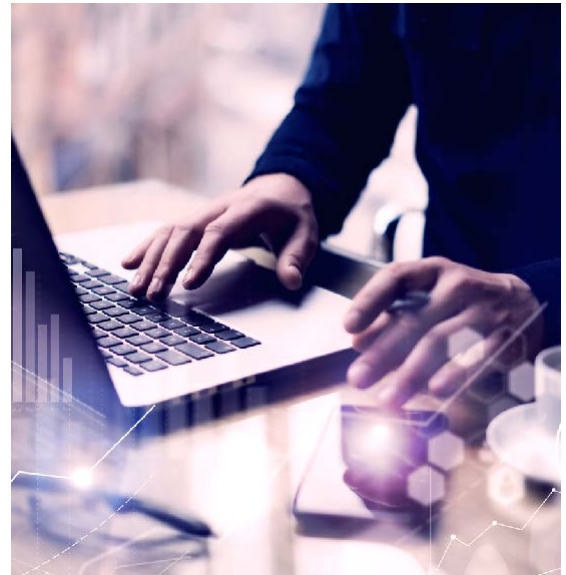
### 5.3 We protect data in our possession

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

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, Information Security and Privacy Policy, Information Security Awareness, Education and Training Policy, Data Retention Policy, Intellectual Property Rights Policy, and the Privacy and Protection of Personally Identifiable Information Policy.



## 6. We LOVE by 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.

## 7. We LOVE by providing assistance

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 General Counsel.

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 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, Human Resources, or the Legal Department. You never have to figure out how to handle a complex situation alone. We are always here to help.

## About Anaplan

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To learn more, visit [anaplan.com](https://anaplan.com)