



Anti-Human Trafficking Policy

Snowflake complies with all applicable laws and respects internationally recognized human rights where we operate and expects the same of our partners. All labor must be voluntary. We do not engage in child labor, forced, bonded, or indentured labor, involuntary prison labor, slavery, trafficking of persons, or physical punishment. We pay applicable legal wages under humane conditions. We comply with all applicable environmental laws and regulations. This policy is consistent with Snowflake's Code of Conduct and expresses our firm commitment to protect and advance human dignity and human rights in our global business practices.

This policy applies to all employees, members of the board of directors, and contractors of Snowflake Computing, Inc. and its subsidiaries (together, "**Snowflakes**," "**representatives**" or "**you**").

Policy Statement

Snowflake prohibits trafficking in persons and slavery. Snowflakes and Snowflake's contractors, subcontractors, vendors, suppliers, partners, and others through whom Snowflake conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following prohibited activities:

- Engaging in any form of trafficking of persons;
- Using force, fraud, or coercion for the purpose of subjecting a person to involuntary servitude, peonage, debt bondage, or slavery;
- Procuring commercial sex acts;

- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants recruitment fees;
- Failing to provide return transportation or paying for the cost of return transportation upon the end of employment, if required by law or contract;
- Failing to provide or arrange housing that meets the host country housing and safety standards, if required by law or contract;
- Failing to provide an employment contract, recruitment agreement, or other required work document in writing, if required by law or contract.

Snowflake has undertaken actions, and is committed to maintaining and improving its

systems and processes, to eradicate human trafficking and slavery in its business operations.

➤ **Supplier certification:**

Snowflake has initiated a supplier certification process that, where required by law, has Snowflake suppliers certify to the best of their knowledge that they comply with applicable anti-slavery and human trafficking laws.

➤ **Accountability standards:**

Snowflakes will be held responsible when they fail to meet Snowflake's business conduct requirements, including this policy. We expect our partners to also adhere to these standards and, when these conditions are not met, we will take appropriate measures, including potential termination of our business relationship.

➤ **Training:**

Snowflake provides training on anti-slavery and human trafficking issues to employees that directly engage in government contracting.

Investigations and Audits

Snowflake will perform reasonable investigations and audits designed to verify that internal Snowflake operations are being conducted in compliance with this policy. Snowflakes are required to fully and promptly cooperate with our internal and external auditors and investigators, and must respond fully and truthfully to their questions, and requests for information and documents. Any failure to cooperate, or any action to hinder an investigation or audit, including for example, hiding, destroying, or deleting any emails, information, or documentation, or providing false answers or false information, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

Raising Issues and Concerns

If you have questions about this policy or the right thing to do, please contact Human Resources or Legal. You must report any suspected violation of laws, rules, regulations, or this policy to Human Resources or Legal immediately.

Snowflake does not tolerate retaliation. Snowflake will not retaliate, and will not tolerate retaliation, against anyone who, in good faith, reports violations or suspected violations or assists in an investigation of a reported violation. Immediately report to Human Resources or Legal any acts that appear to be retaliation.

If you prefer to remain anonymous, you can also report your concerns through the Snowflake Whistleblower Hotline in one of two ways:

Phone: 1 (415) 963-0591

Email: whistleblower@snowflake.com

If you report anonymously, Snowflake will protect your anonymity to the extent possible, but cannot guarantee it.

Concerns may also be reported to the Global Human Trafficking Hotline:

Phone: 1-844-888-FREE

Email: help@befree.org

Adoption and Amendment History

Adopted: March 5, 2019

Last Updated: March 5, 2019

Policy Owner: Chief Legal Officer