

BUSINESS PARTNER STANDARDS OF CONDUCT



Snowflake's identity and success is built on our foundation of integrity, honesty, and ethical conduct. Our foundation depends not only on our own employees but also upon our forming relationships with business partners who share our commitment to ethical business practices. These Snowflake Business Partner Standards of Conduct ("Standards") articulate our own commitment and our expectations of our business partners.

Integrity and Compliance with Laws

Anti-Corruption

Snowflake business partners must not permit or engage in any form of corruption, extortion, or bribery – whether they are working with government officials or solely in the private sector. Snowflake business partners must not offer, give, or authorize any gift, loan, fee, reward, bribe, or other advantage to any customer, government official, government employee, or Snowflake employee to improperly influence any action or decision. All Snowflake business partners must follow applicable international anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

Fair Competition

While Snowflake competes vigorously in all of its business activities, we are committed to dealing fairly with our customers and competitors. Snowflake business partners must never propose, discuss, exchange information regarding, or enter into an understanding or agreement, with any competitor concerning:

- Costs, prices, discounts or other terms or conditions of sale;
- Profits or profit margins;
- Allocation of product, customers, markets, or territories;
- Limitations on production or supply;
- Boycotts of customers or suppliers; or
- Bids or the intent to bid.

Honest and Accurate Dealings

Snowflake business partners must not make any false representations in connection with any Snowflake transaction including, but not limited to, oral misrepresentations of fact or the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, forged letters of destruction or any other false or inaccurate records.

Conflicts of Interest

Snowflake business partners must avoid activities that create or appear to create actual or potential conflicts of interest between their own interests and the interests of Snowflake. Snowflake business partners must not offer or provide gifts or excessive hospitality or entertainment to any Snowflake employee or customer or their families to obtain or retain business or to influence a decision. Snowflake employees and their family members may not hold any significant economic interest in any entity that does business with Snowflake, and business partners are required to avoid such relationships with Snowflake employees. Snowflake business partners may not engage in reselling to a government customer when the business partner has already provided consulting services to the government customer advising on the procurement of services that Snowflake provides.

Snowflake business partners must proactively raise actual or potential conflicts of interest with Snowflake so that the situation can be evaluated and addressed appropriately.

Export Controls

U.S. and international trade laws control (a) where Snowflake may send or receive its products and services, and (b) to whom Snowflake may sell its products and services. Snowflake business partners must strictly comply with applicable international trade laws and regulations.

Intellectual Property and Confidential Information

Snowflake business partners may only use Snowflake's intellectual property, such as trade secret information, copyrights, patents and trademarks, in a manner permitted under their contract with Snowflake and may not misappropriate or infringe the intellectual property rights of others. Snowflake business partners must not

misuse any trade secrets or proprietary or confidential information of Snowflake or of others for their own purposes or disclose such information to unauthorized third parties. Snowflake business partners must notify Snowflake if they become aware of any unauthorized use of the Snowflake intellectual property.

Responsible Sourcing of Elements

Snowflake business partners must take reasonable measures to determine whether the products they supply to us contain tantalum, tin, tungsten, or gold, and, if so, implement supply chain due diligence processes to identify the sources of these metals and to support efforts to eradicate the use of minerals that finance – directly or indirectly -- armed conflict in the Democratic Republic of Congo or adjoining countries.

Environmental Standards

Snowflake business partners are expected to have a systematic approach to the management of risks associated with the environment – including the risk of regulatory non-compliance and reputational loss associated with poor product stewardship.

Permits and Registrations

Snowflake business partners must obtain all required environmental registrations, permits, and approvals and comply with applicable reporting requirements.

Conservation of Resources

Snowflake encourages its business partners to proactively take steps to reduce waste whenever practicable, including increasing recycling of materials, avoiding the use of unnecessary packing materials, and conserving scarce resources.

Labor Standards

Snowflake business partners and their suppliers must only engage in labor practices that comply with applicable laws, including anti-human trafficking laws.

Freely Chosen Employment

Snowflake business partners and their suppliers must not use forced, bonded, or indentured labor or involuntary prison labor. Our business partners must only utilize labor where the individuals performing such labor have freely chosen such employment – their workforce must not be a result of slavery or the trafficking of persons. Our business partners and their suppliers should not transport, harbor, or recruit vulnerable persons by means of threat, force, coercion, abduction, or fraud.

Labor Conditions

Snowflake business partners must:

- NOT engage in child labor (the term “child” refers to any person under the minimum legal age for employment where the work is performed);
- Pay applicable legal wages and enable employees to work hours that comply with local laws;
- Comply with applicable safety and health laws, regulations, policies, and procedures and provide working conditions that meet local health and safety standards; and
- Validate and review all relevant documentation prior to employment of a worker to ensure that all employees have the legal right to work in their local.

Diversity and Non-Discrimination

Snowflake business partners must not unlawfully discriminate in employment opportunities or practices on the basis of gender, race, color, religion, age, citizenship, sexual orientation, gender identity, gender expression, marital status, pregnancy, national origin, ancestry, physical or mental disability or condition, or any other protected class under applicable laws.

Freedom from Harassment

Snowflake business partners must never allow unlawful harassment, bullying, or physical punishment in the workplace. This would include any conduct that may foster an offensive or hostile work environment, such as unwelcome or unsolicited sexual advances, threats of physical harm or violent behavior, or use of discriminatory slurs or inappropriate remarks or jokes.

Application of The Standards

Applicability

These Standards apply to all Snowflake business partners, including our distributors, resellers, solution and consulting partners, alliances partners, suppliers, vendors, and service providers.

Certification

Where **required by** Snowflake, each business partner covered by these Standards shall have an authorized representative certify that he or she has read and understood these Standards and commits the Snowflake business partner to complying with these Standards.

Monitoring and Application

Snowflake may audit compliance with these Standards or appoint a third party to conduct an audit. Any violations will be reported to the Snowflake business partner's management for their attention and, if appropriate, corrective action. It is the intention of Snowflake to terminate its relationship with any business partner who does not comply with these Standards or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance. In addition, violations may be reported to the law enforcement authorities when appropriate.

Raising Issues and Concerns

It is our expectation that our business partners will report any violation of laws, rules, regulations, or these Standards in connection with a Snowflake transaction or engagement immediately to the Snowflake Legal Department. We expect that our business partners will not retaliate against anyone who, in good faith, reports a violation or suspected violation or assists in an inquiry into such a report.

The Snowflake Legal Department can be reached directly by email:

Email: legal@snowflake.com

If you prefer to remain anonymous, you can also report your concerns through the Snowflake Whistleblower Hotline by phone or email:

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.

Adoption and Amendment History

Adopted: April 22, 2019

Policy Owner: Chief Legal Officer

