

## Zendesk Modern Slavery Statement 2023

### Introduction

This modern slavery statement sets out the steps that Zendesk, Inc and Zendesk Pty Ltd. (ACN 151 424 770), collectively, **Zendesk** have taken to ensure that modern slavery and human trafficking does not take place in the Zendesk business or supply chains during the financial year of 1 January 2022 to 31 December 2022. Zendesk, Inc. is a direct subsidiary and sole shareholder of the parent company, Zoro Bidco, Inc., an international group of companies.

This statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (Australia) and other modern slavery legislation in countries where Zendesk operates.

### Our business

Zendesk started the customer experience revolution in 2007 by enabling any business around the world to take their customer service online. Today, Zendesk is the champion of great service everywhere for everyone and powers billions of conversations, connecting more than 100,000 brands with hundreds of millions of customers over telephony, chat, email, messaging, social channels, communities, review sites, and help centres. Zendesk products are built with love to be loved.

Zendesk was conceived in Copenhagen, Denmark, built and grown in California, and today employs around 6,000 people across the world. Zendesk is headquartered in the United States of America and currently has operations in more than 20 countries.

### Our suppliers

Typically, our major suppliers fall into one of the broad categories outlined below and come from a global pool:

- hosting services providers who host our data and our customers' data processed in our software as a service (**SaaS**) offerings;
- third-party consultants (including subcontractors) that we engage for services from time to time related to various work, including accounting work, legal counsel, IT applications, security, professional services; and
- service providers providing a range of services including relating to IT, travel, employee payroll, and maintenance.

Where possible, we use preferred suppliers for our service providers and consultants. We use a range of annual to multi-year contracts with our vendors. Zendesk has structured a renewal process where it reviews market options, pricing and review utilisation and need for contract growth at each supplier renewal. In addition to this and to the extent possible, Zendesk carries out due diligence and seeks to include appropriate contractual terms in supply contracts to prevent, so far as is practicable, any practices of modern slavery.

### Risks of modern slavery practices in our operations and supply chains

- ***The type of services we engage in.*** Our business focuses on the provision of SaaS and professional services. Accordingly, we do not “manufacture” our products and solutions, at least not in the traditional meaning of that work (i.e. through the use of workers and machines in factories). Nor do we directly engage third parties to perform any such manufacturing on our behalf.

- ***Maintaining rigour in our human resource processes.*** Our human resources processes ensure that those recruited have appropriate authorisations to work. We additionally verify legal age for employment prior to hiring.
- ***The nature of our usage of non-SaaS services outside contractors.*** Our usage of outside contractors for professional services or non-SaaS services is generally very limited. Accordingly, we consider there is a very limited modern slavery risk in the provision of our professional or other non-SaaS services.
- ***The nature of our largest vendors.*** As a SaaS company, our largest vendors typically consist of hosting and related cloud service providers. Our vendors also include providers of online advertising services and various professional services.
- ***The geographic locations in which we engage.*** As of the date of this statement, the majority of jurisdictions in which our customers and suppliers are located are geographical locations in which we do not consider the risk of illegal activities such as modern slavery to be high. As we consider expanding into new jurisdictions, we undergo a robust diligence process to identify a broad-spectrum of risks prior to investing in that jurisdiction, including general employment practices within the region.

Having taken the time to consider the nature of our operations and our supply chains, we consider the modern slavery risk they present to be low.

### **Actions taken to assess and address risks of modern slavery**

Despite our assessment that the modern slavery risk presented by our operations and supply chains is low, we remain committed in our absolute opposition to modern slavery and are committed to robust standards of legal and ethical business conduct.

### **Governance**

In line with our commitment to the highest standards of legal and ethical business conduct, we support the elimination of modern slavery and human trafficking as outlined in the United Nations Universal Declaration of Human Rights. Our Code of Conduct prohibits any unlawful or unethical activity by any of our directors, officers, employees or consultants. Furthermore, we expect our suppliers to acknowledge our Human Rights policy and to conduct their employment practices in full compliance with all applicable laws and regulations. Additionally, through our employee volunteering, company donations, and products, we regularly support organisations that align with our mission to promote dignity, inclusion and respect for all people.

We believe that in order to deliver consistent growth to our stakeholders over the long term, we must commit to sustained improvement in our impact on the environment and the communities in which we operate. In early 2021, we established an Environmental, Social and Governance (**ESG**) Committee, sponsored by executives across various key functions, to oversee and champion ESG-related initiatives across the company.

### **Policies**

Our Supplier Code of Conduct (**Supplier Code**) outlines our expectations regarding the practices and values that suppliers and vendors conform their practices to in order to do business with us. The Supplier Code is made available via our Intranet, public facing pages and supplier portal.

The Supplier Code contains the minimum standards that we expect from our supplier community. It is not intended to reduce, replace, or limit any other legal or contractual obligations that our suppliers have to Zendesk. We expect that our suppliers share our commitment to human rights and equal opportunity in the workplace and conduct their employment practices in full compliance with all applicable laws and regulations.

Internally, we also have our Code of Conduct, Whistleblower policy and a grievance mechanism applicable to all our employees and third parties (as applicable).

### Due diligence

Our Compliance Team is made up of: a Vice President, Associate General Counsel of Compliance, plus a team of compliance analysts, reporting to the General Counsel, and an Human Resources Compliance Specialist, Associate Employee Relations Consultant, Manager (Employee Relations), and Director (HR Risk Management) reporting to the head of HR, all of whom are collectively responsible for managing our policies, governance, risk assessment, controls, investigations, and third party due diligence.

The Board of Directors has an oversight role for Zendesk's compliance program, including our Codes of Conduct and Supplier Code. The executives have management responsibility to implement appropriate policies, governance, and controls to ensure compliance by and on behalf of Zendesk.

All employees are required to certify that they have read and observe Zendesk's Code of Conduct. Zendesk has a process for removing customers if it becomes aware that there is a breach of our User Content and Conduct policy, which expressly references and strictly prohibits Child Exploitation and Human Trafficking.

### Staff training

We provide regular training on the employee handbook and Code of Conduct to our personnel.

All employees and some contractors are required to take annual on-demand Code of Conduct training. Select third parties (selected with a risk based approach) who act on Zendesk's behalf are required to certify that their employees have undertaken the relevant training, or otherwise have their employees complete Zendesk training.

Zendesk's employee and partner ecosystems are global, in different time zones and native languages. We therefore provide on demand training for all, with the option to provide some of the training in native language, via our vendor. In some jurisdictions, we rely on the trainer to allow live trainers to deliver the training in local or native languages of the recipients.

Also, in support of our internal ideals regarding modern slavery, we provide training to key members of our sales and procurement teams on the importance of our partners reflecting our commitment against modern slavery.

### Adherence to our values and ethics

The risk of modern slavery in our supply chain is low due to:

- the sector in which we operate;
- the nature of our supply chains and values; and
- policies and the Code of Conduct to which our employees, directors and officers are required to adhere.

To the extent that a risk of modern slavery, or a potential modern slavery incident was identified within our business or supply chain, we would investigate and deal with that

incident in accordance with our Code of Conduct. This may range from seeking remediation by the relevant party or terminating the relationship where appropriate.

### **Further actions**

During the coming financial year, we are seeking to:

- Implement enhanced screening tools and processes to assist with identifying any breaches of our User Content and Conduct policy, which expressly references Child Exploitation and Human Trafficking.
- Enhance our third party due diligence processes with improved tooling to include adverse media searches against various environmental, social and corporate governance related databases.
- Standardize the use of contractual clauses requiring certification that relevant general compliance training has been completed.
- Review our Human Rights policy to reflect Zendesk's current policy on modern slavery risk management, investigation and remediation.

### **Assessing effectiveness of actions**

Whilst Zendesk has implemented various measures in place to prevent modern slavery, including, but not limited to ongoing industry benchmarking to align with its competitors and conducting annual reviews of its Human Rights policy and enhanced third party due diligence tooling and procedures, it does not yet have any specific mechanisms to assess the effectiveness of its controls established regarding its workforce and hiring practices.

The ESG committee currently provides oversight and recommendations on the content and effectiveness of the policies and compliance and internal audit teams conduct periodic risk assessments.

Zendesk awaits further time and information before it can accurately evaluate the effectiveness of its measures to address the risks of modern slavery.

### **Consultation**

This statement has been prepared by Zendesk, Inc. in consultation with the entity with whom we make this joint statement, being the Australian subsidiary listed above.

As part of the consultation process, high level questions were submitted to procurement, Human Resources, revenue operations, corporate legal and compliance functions.

This statement is approved by the General Counsel.

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*Shanti Ariker*  
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Shanti Ariker

General Counsel, Zendesk, Inc.