

# FY25 Salesforce (SFDC Norway AS and salesforce.com Germany GmbH) Joint Statement on the German Supply Chain Due Diligence Act (SCDDA) and the Norwegian Transparency Act (Åpenhetsloven)

This Policy Statement ("statement") has been issued by SFDC Norway AS pursuant to Section 5 of the Norwegian Transparency Act (Åpenhetsloven), and by salesforce.com Germany GmbH. This statement discusses Salesforce's global business practices to address human rights and environmental risks as a global enterprise.

Salesforce, Inc. ("Salesforce," the "Company," "we" or "our") is a global leader in customer relationship management ("CRM") technology, enabling companies of every size and industry to connect with their customers through the power of data, artificial intelligence ("AI"), CRM and trust. Founded in 1999, we bring humans together with AI agents to drive customer success on one deeply unified platform. Our Al-powered Salesforce Platform unites our offerings — spanning sales, service, marketing, commerce, collaboration, integration, AI, analytics, automation, industries and more — by connecting customer data across systems, applications and devices to create a complete view of customers. With this single source of customer truth, teams can be more responsive, productive and efficient and deliver intelligent, personalized and automated experiences across every channel. With Agentforce, the agentic layer of the Salesforce Platform, our customers can build and augment their teams with an always-on digital labor force, deploying autonomous AI agents across business functions that aim to increase productivity, lower costs and drive operational efficiencies. Our service offerings are designed to be flexible, scalable and easy to use. They can generally be configured easily, deployed rapidly and integrated with other platforms and enterprise applications. We sell to businesses worldwide, primarily on a subscription basis, through our direct sales efforts and also indirectly through partners. In addition, we enable third parties to use our platform and developer tools to create additional functionality and new applications that run on our platform, which are sold separately from, or in conjunction with, our service offerings

Because Salesforce's operations in Germany and Norway are consistent with our global business model—and because procurement is not managed on a country-by-country basis—our human rights risks and management approach do not materially differ across geographies. Human rights due diligence, including supplier oversight and employee protections, is managed centrally and applied enterprise-wide. As such, our statement reflects a global approach to human rights, which includes and covers the operations and supply chains of our German and Norwegian entities.

This statement outlines our approach to compliance with the **German Supply Chain Due Diligence Act (SCDDA)** and the **Norwegian Transparency Act (Åpenhetsloven)**, ensuring that we meet legal obligations while fostering responsible business conduct. The statement has been approved by the executive management of salesforce.com Germany GmbH, and the board members of SFDC Norway AS.



#### A. Overview

Salesforce believes in and is committed to respecting human rights and the environment and embedding ethical considerations into everything we do, ensuring that our technology empowers people, fosters trust, and upholds the dignity of all users.

As best practice for understanding and managing human rights risks and its impacts, Salesforce's approach is informed by the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Salesforce has a global <u>Human Rights Policy</u> that outlines our commitment to respecting human rights and details our approach to identifying, assessing, and addressing human rights impacts across our operations and value chain.

## **B. Risk Management Program**

#### 1. General

Salesforce is on a journey to continuously enhance its due diligence processes, ensuring it effectively identifies, prevents, and mitigates adverse human rights and environmental impacts. Salesforce has established a Human Rights Steering Committee with global oversight of the company's human rights activities. In support of this mandate, a dedicated Human Rights Subcommittee (the "Subcommittee") has been formed to oversee risk management and oversee compliance with the LkSG and the Norwegian Transparency Act. The Subcommittee is composed of cross-functional senior leaders and subject matter experts from across Salesforce's global operations. It meets regularly and reports at least annually to the relevant managing directors in Germany and Norway.

#### 2. Risk Assessment

**Supply Chain Assessment:** In FY25, we conducted an abstract risk assessment which included a review of key suppliers based on their location and industry, evaluating potential risks related to occupational health and safety, discrimination, freedom of association, child labor, forced labor, and fair payment.

**Salesforce Operations:** As part of our commitment to upholding human rights, we regularly conduct employee surveys to assess workplace conditions, identify potential concerns, and ensure our practices align with our values. We also examine work-life balance and mental health risks, particularly regarding mental health stressors in high-performance cultures.

#### 3. Grievance Mechanism:



Salesforce provides an accessible and secure grievance mechanism that allows anyone—employees, contractors, suppliers, stakeholders, or the public—to raise concerns related to human rights, environmental impacts, or other forms of misconduct. Reports can be submitted confidentially, and where legally permitted, anonymously through our third-party hosted platform, EthicsPoint reporting line, available 24/7, which is available in over 20 different languages.

All submissions are reviewed by internal teams and handled in a timely, respectful, and confidential manner. We are committed to a strict non-retaliation policy, ensuring protection for individuals who report concerns or participate in investigations.

Salesforce regularly reviews the effectiveness of the grievance mechanism to ensure it continues to meet best practices and supports our broader human rights and environmental due diligence efforts.

### C. Identified Risks and Risk Prioritization

Given Salesforce's role as a software-as-a-service (SaaS) provider, the company's overall human rights and environmental risk exposure from its own operations and supply chain is inherently limited. Our business model does not rely on physical manufacturing processes or high-risk raw material sourcing, and our direct workforce consists primarily of knowledge workers operating in low-risk geographies. As such, human rights risks such as occupational health and safety violations, forced labor, and child labor are significantly less prevalent in both our operations and supply chain.

In a recent high-level abstract risk assessment, we engaged an external party to review human rights risks in key direct suppliers and internal operations. The risk assessment generally identified potential human rights risks for suppliers operating in sectors such as construction, consulting, IT services, maintenance, catering, telecom, security, event planning, and office supplies. The main risks detected were related to employment practices, workplace health and safety, and payment issues.

In Salesforce's own operations, the risk assessment identified occasional minor occupational accidents, and potential risks regarding excessive working hours and mental stress—particularly in high-performance cultures and countries.

In light of this risk assessment, our priority focus areas include:

- Strengthening oversight of suppliers in sectors like construction, catering, and information technology (IT) services where risks like wage issues, workplace safety, or discrimination may exist.
- Monitoring employee well-being, especially in regions with high-performance work cultures where mental health stress may be a concern.



This risk-based approach ensures that our human rights due diligence efforts remain proportionate, effective, and targeted, even in a low-risk operating context. It also allows us to adapt to emerging risks and regulatory expectations, maintaining compliance while upholding our broader commitment to ethical and responsible business conduct.

# 1. Preventive Mitigation Measures

To proactively mitigate human rights risks across our operations and supply chain, Salesforce has implemented a range of preventive measures and is expanding its efforts as part of our ongoing commitment to responsible business conduct.

## a. Current Measures:

# **Contractual Safeguards and Supplier Code of Conduct:**

We require our suppliers to adhere to our <u>Supplier Code of Conduct</u>, which sets clear expectations around labor rights, non-discrimination, workplace safety, and ethical business practices. Contractual clauses reinforce compliance and enable corrective action where needed.

## **Employee Code of Conduct:**

All Salesforce employees are required to review and sign our <u>Code of Conduct</u> and complete training on the Code on an annual basis. This Code outlines our ethical standards and expectations, including respect for human rights, non-discrimination, and integrity in all business dealings.

## **Health and Safety Policy**

Per our <u>Health & Safety Policy</u>, we are committed to providing a healthy and safe work environment for employees and contractors. Our Health & Safety Management System promotes open communication and consultation with employees & company leadership, proactive identification and management of health (physical and mental) and safety risks, and compliance with applicable laws and regulations.

#### **Workplace Well-being Initiatives:**

We support employee well-being through health and wellness benefits, comprehensive mental health programs, flexible work policies, and initiatives designed to promote a healthy work-life balance. These efforts aim to address psychosocial risks, particularly in high-performance work environments.

## b. Measures in Development:

**Augmented Supplier Due Diligence:** We are in the process of reviewing our supplier onboarding and enhancing our monitoring processes to include deeper human rights due diligence. This may include screening, targeted assessments, and ongoing monitoring of key suppliers based on risk profiles, geography, and industry. Suppliers identified as higher-risk may be prioritized for further engagement and follow-up actions.



These preventive measures are essential to our broader human rights strategy and reflect our commitment to continuously strengthening our due diligence framework in line with global standards and regulatory requirements.

# D. Continuous Improvement and Effectiveness Review

Salesforce is committed to reviewing and updating this statement and its risk management program to ensure its continued relevance and effectiveness at least yearly. We will assess and adjust our due diligence processes and resourcing as needed to reflect changes in risk exposure, operational developments, and emerging best practices. Our commitment to responsible business conduct and respecting human rights and environmental standards remains central to our approach, and we will ensure that our policy evolves in line with international standards and local regulations.

# salesforce.com Germany GmbH:

Managing Directors:

Stéphane Jean Claude Frédéric Jaccottet

Joachim Hakan Wettermark

Lesa McDonagh

Docusigned by:
Stephane Jacottet
D14522FE1DEE454...
Signed by:
down-limburnek
80DACCF758BA43E...
Docusigned by:
USA MWONAGU
ADRESF4762CD40F

# **SFDC Norway AS:**

Directors:

Stéphane Jean Claude Frédéric Jaccottet

Samuel Vallotton

Docusigned by:

Stephane Jacottet

D14522FE1DEE454...

Docusigned by:

FBBC6E404C9842E...