

ESG

ENVIRONMENTAL, SOCIAL,
AND GOVERNANCE IMPACT REPORT



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A Message From the CEO

We were founded on a core set of shared values that make us uniquely Sprinklr. **The Sprinklr Way** is our way of working, living, and being, and it guides our interactions with each other, our customers, our partners, and the communities where we live. And because one of our core values is to passionately and genuinely care, Sprinklrites are deeply committed to building innovative solutions that exceed customer expectations in ethical and environmentally conscious ways.

We invite you to view our **Environmental, Social, and Governance (ESG) Impact Report**, which showcases our recent accomplishments, progress, and ESG initiatives.

What ESG means for Sprinklr

Sprinklr's long-term vision is to create a new category of software called **Unified-CXM**. Our platform is purpose-built with AI to unify silos, teams, and technology so brands can improve the experiences of the customers they serve. Like our platform, our ESG commitment is also a unified effort to create value across every part of our business from product design to implementation, and for our shareholders. We believe in the power of a unified approach for the shared success of our customers, partners, employees, and society at large.

Environmental responsibility is an important call to action, and, as a Sprinklr community, we are committed to making positive contributions to the planet. From reducing our carbon footprint to investing in sustainable practices, we play an active role in environmental stewardship. We are proud that, in 2023, Sprinklr achieved Platinum Certification with EcoVadis. We will continue efforts in 2024 to further our sustainability practices while partnering with our customers and vendors to reduce our collective carbon footprint.

Social impact is intricately linked to the well-being of the communities we serve. From fostering a culture of belonging and inclusion to giving to personally meaningful causes, Sprinklrites are a force for positive change in the communities where they live. Our teams in Bangalore dedicated their 24-4-Others time volunteering at the Sankalp Blood Center, learning about the resilient stories of the center's patients and organizing fun activities to bring happiness to the community. In California, another team dedicated time and supplies to a local organization empowering individuals, families, and communities to act against violence and abuse. These are just a few of the countless stories from our teams around the world dedicated to making a difference.

Governance is the bedrock of our integrity and accountability. Sprinklr is committed to transparency, ethical conduct, and the highest standards of corporate governance. It's not just about compliance; it's about setting a gold standard for responsible business practices. Sprinklr's governance and trainings, from our internal policies on Health, Safety & Sustainability Practices or Harassment and Discrimination to our Supplier Code of Conduct, are designed to set expectations on ethical conduct for both our employees and the partners we do business with.

We are proud of our efforts outlined in our inaugural ESG report, which demonstrate the values that make Sprinklr a force for good and our commitment to this ongoing work. Thank you to everyone who contributed to these efforts. Your empathy and excellence unify us, and your dedication, passion, and unwavering commitment to making Sprinklr an example of responsible business practices embodies the foundation of our culture and The Sprinklr Way.

We believe that together we can make a positive difference on this planet 100 years from now. We look forward to continuing this journey alongside our customers, partners, and employees.

Ragy Thomas
Founder and CEO, Sprinklr



ABOUT THIS REPORT

This inaugural report is intended to share existing initiatives at Sprinklr, Inc. (“Sprinklr” or the “Company”) as they relate to our environmental, social, and governance (“ESG”) program. This report details our progress over the last several years and, unless stated otherwise, all data contained in this report is reflective of the Company’s operations from January 1, 2022, through December 31, 2022. Though we strive to provide the most accurate data possible, some of the data or numbers in this report may contain figures that are rounded or approximated based on the measurements and calculations available to us. Our ESG efforts will remain ongoing, and we look forward to continuing to increase transparency as we work to scale our ESG initiatives over the coming years.

The contents of this report are informed by the Global Reporting Index (GRI) Standards 2021 (Core Option), and Sprinklr has aligned this report to the UN Global Compact (UNGC) principles, CDP reporting, and EcoVadis. The GRI context table is included in Appendix A at the end of this report. Sprinklr’s carbon footprint calculations follow the Greenhouse Gas (GHG) protocol, and the calculations have a limited assurance provided by a third-party sustainability consulting firm. The metrics and quantitative data are not based on generally accepted accounting principles, and, while this report has been reviewed by Sprinklr’s senior leadership and key stakeholders, it has not been audited.

DISCLAIMER

This report contains forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended, about Sprinklr and its industry that involve substantial risks and uncertainties. All statements in this report other than statements of historical fact are forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Forward-looking statements generally relate to future events and may be identified by the use of words such as “aim,” “anticipate,” “aspire,” “believe,” “commit,” “contemplate,” “continue,” “could,” “estimate,” “expect,” “goal,” “intend,” “may,” “might,” “plan,” “potential,” “predict,” “project,” “seek,” “should,” “strive,” “target,” “undertake,” “will,” or “would,” or the negative of these words, or other similar terms or expressions that concern Sprinklr’s expectations, strategy, plans, or intentions.

Sprinklr has based the forward-looking statements contained in this report primarily on its current expectations and projections about future events and trends that Sprinklr believes may affect its business, financial condition, and operating results. The outcome of the events described in these forward-looking statements is subject to risks, uncertainties, and other factors that could cause results to differ materially from Sprinklr’s current expectations, including as set forth in Sprinklr’s filings with the U.S. Securities and Exchange Commission. You should not place undue reliance on Sprinklr’s forward-looking statements. Sprinklr assumes no obligation to update any forward-looking statements to reflect events or circumstances that exist or change after the date on which they were made, except as required by law.

Numbers and percentages in this report include estimates or approximations and may be based on assumptions or incomplete data. We believe that the estimates employed are appropriate and reasonable; however, due to inherent uncertainties in making estimates and assumptions, actual results could differ from the original estimates. The inclusion of information contained in this document should not be construed as a characterization regarding the “materiality” of that information in the context of the U.S. federal securities laws, Delaware General Corporation Law, or any other regulatory framework, even where we use words such as “material” or “materiality.” Our approach to ESG disclosures is informed by impacts on communities, the environment, and stakeholders such as employees, customers, and suppliers, and, therefore, the inclusion of topics in this document does not indicate that such topics are material to the Company’s business, operations, or financial condition.

Website references and hyperlinks throughout this document are provided for convenience only, and the content on the referenced websites is not incorporated into this report. This report also includes certain information regarding ESG practices that has been obtained from published sources or third parties. The accuracy and completeness of such information are not guaranteed. Although Sprinklr believes such information is reliable, such information is subject to assumptions, estimates and other uncertainties, and Sprinklr has not independently verified this information. Any references to sources outside of this report are provided for convenience only and the content of such sources are not incorporated by reference into this report. The standards of measurement and performance for ESG issues are developing or are based on assumptions, and norms may vary.

At a Glance



Over 23k+

Meals donated by Sprinklr and Sprinklrites via Sharebite in our NYC and Austin offices to date.



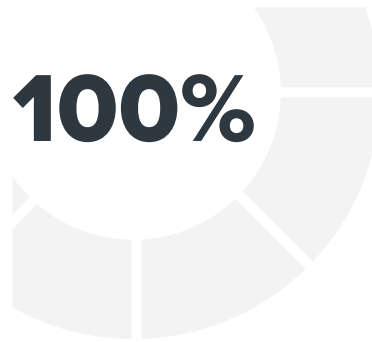
\$19k+

For Giving Tuesday 2023, Sprinklr matched donations to raise over \$19k+ in support of causes that mean the most to Sprinklr employees and their communities.



7.7

The average employee happiness score of all Sprinklrites in 2023 (out of 10).



100%

Of employees in 2022 and 2023 completed compliance refresher training, which covered Sprinklr's Code of Conduct, corporate governance, privacy, and security.



500+

Sprinklrites belong to at least one of our 7 Employee Resource Groups, known collectively as Sprinklr's We Care teams.

4

Consecutive years of Sprinklr receiving awards for being a great place to work.



100%

Of Sprinklr's products and platform run in the public cloud, enabling more efficient energy use.

SPRINKLR IS HERE TO DO THREE THINGS:



Lead a new category of enterprise software that we call **Unified-CXM**



Build the world's most loved enterprise software company



Create a culture of high performers who are kind, caring and obsessed about customers

At Sprinklr, we empower the world's largest and most loved brands to make their customers happier. As the first platform purpose-built for unified customer experience management (**Unified-CXM**) and trusted by enterprise, our industry-leading AI-powered platform includes four product suites: **Sprinklr Service**, **Sprinklr Social**, **Sprinklr Marketing**, **Sprinklr Insights**, and self-service offerings. By enabling all customer-facing teams, markets, and geographies to collaborate across internal silos, communicate across digital channels, and leverage a complete suite of modern capabilities, brands benefit from a unified digital edge and can deliver better, more human customer experiences at scale.

UNIFIED CXM

SPRINKLR SERVICE

Deliver consistently delightful customer service experiences across every touchpoint with our AI-powered customer service platform.

SPRINKLR SOCIAL

Reach, engage, and listen to customers across 30+ digital and social channels. Maximize engagement and drive revenue with our all-in-one social media management platform.

SPRINKLR MARKETING

Orchestrate on-brand global marketing campaigns across social, digital and traditional channels and drive higher marketing ROI with a unified marketing and advertising suite.

SPRINKLR INSIGHT

Uncover real-time consumer, product, and market insights to build great products and drive brand loyalty with an AI-first consumer intelligence suite.

OUR VISION & MISSION: LIVING BY THE SPRINKLR WAY

Everything we do at Sprinklr is rooted in The Sprinklr Way. It is our way of working, living, and being, with an emphasis on core values that drive an inclusive, high-performing, kind, and caring workforce, who are customer obsessed!

THE SPRINKLR WAY

CORE VALUES OF HIGH PERFORMERS WHO ARE KIND, CARING AND CUSTOMER-OBSSESSED



We are Customer Obsessed

- Commit to making customers happier.
- Innovate, co-develop leading technology with customers.
- Hyperfocus on value.



We Passionately, Genuinely Care

- Be kind. People never forget how you make them feel.
- Embrace others for who they are.
- Show empathy toward others.



We Never Ever Give Up

- Have “believe-it-is.”
- Take a positive approach to situations.
- Fix it, don’t complain.



We Build Trust & Teamwork

- Help others succeed. Be a Giver.
- Debate, commit, fly in formation.
- Assume positive intent.



We are Fearless

- Be confident: We’ve got this.
- It’s OK; take smart risks.
- Constructively challenge the status quo.



We Learn to Grow

- Keep learning. Everyone can be more amazing.
- Leverage your strengths.
- Thrive personally & professionally.



We are Accountable

- Align with a shared understanding of goals and outcomes.
- Do a few things consistently well, 100%.
- Own it!

At Sprinklr, we recognize our employees (referred to herein as “Sprinklrites”), celebrate their successes, and invest in their learning and development. We also recognize that, as a global company and sector leader, we have a role to play in making equitable choices when it comes to our people and planet, and that corporate governance which requires and values integrity in decision-making is a key part of our future and sustainable growth.



AWARDS, CERTIFICATIONS & STANDARDS

We are proud of the awards, certifications, and standards that we have earned for our company culture and ESG efforts and commitments, which include:

2020



2021



2022



2023



2024



ESG AT SPRINKLR

We approach our products, people, and customers with care, and we are committed to making sustainable choices for a brighter future. As the impact of climate change on our planet and our lives becomes ever more evident, those working in technology and innovation know that sustainability is more than a nice-to-have—it's an urgent need. Innovation in the tech sector in recent years has been heavily influenced by a desire to do better in terms of reducing our global carbon footprint and alleviating the damage already done to the environment.

Sprinklr's ESG program was established to coordinate and optimize Sprinklr's work across areas core to our business where Sprinklr can make the biggest impact, to identify opportunities for us to grow and strengthen those commitments, and to demonstrate the positive impact we are making through measurable progress and tangible results. The program is based on a Sustainability Model with three pillars: **Environment, Social, and Governance**, where relevant business areas work together as an integrated management system towards our objectives, activities, and results.

ESG GOVERNANCE COMMITTEE

Development and execution of this strategy is the responsibility of Sprinklr's Executive Sponsors, ESG Steering Committee, and the ESG Advisory Team, a core group of Sprinklrites focused on various aspects of Sprinklr's ESG strategy, as further outlined below. This group is also tasked with driving awareness and education across the wider organization on Sprinklr's ESG efforts.

EXECUTIVE SPONSORS



JACOB SCOTT
General Counsel



DIANE K. ADAMS
Chief Culture & Talent Officer

To help align Sprinklr's ESG efforts to overall company strategy, Sprinklr's Executive sponsors support the ESG strategy. Executive sponsors are also tasked with communicating and creating lines of visibility of progress to the Nominating and Corporate Governance Committee of Sprinklr's Board.

ESG STEERING COMMITTEE

The ESG Steering Committee is a collaborative and cross-functional group of leaders that defines the overall ESG strategy, facilitates decision-making for ESG projects, and seeks to integrate and apply the ESG strategy across Sprinklr. Sprinklr's ESG Steering Committee manages and oversees Sprinklr's ESG certifications and is responsible for promoting the program internally and externally. The ESG Steering Committee also reviews all ESG programs and regularly provides updates to the Board under the direction of our Executive sponsors.

Aligned with each of the material ESG focus areas, as further described below, Sprinklr's ESG Advisory Team is comprised of various company leaders who are responsible for establishing and delivering on ESG goals and outcomes within their respective subject matter areas and departments.

GLOBAL ESG ASSESSMENT

Between 2022 and 2023, Sprinklr conducted a global ESG prioritization assessment through an independent third-party provider. The assessment focused on non-financial risks and opportunities to assess relative degrees of prioritization for the ESG factors listed below. During this assessment, we collected important feedback from a diverse set of stakeholder groups and used that information to inform Sprinklr's comprehensive ESG strategy, roadmap, goals, and key performance indicators. This process has allowed us to move to the next level of our ESG journey and set the stage for the robust program we aspire to create and included the following steps:

1 IDENTIFICATION

Sprinklr developed a list of 18 unique ESG topics for evaluation based on industry research and leading disclosure frameworks, as well as the relevant internal stakeholders who would be required to help assess these topics:

ENVIRONMENT

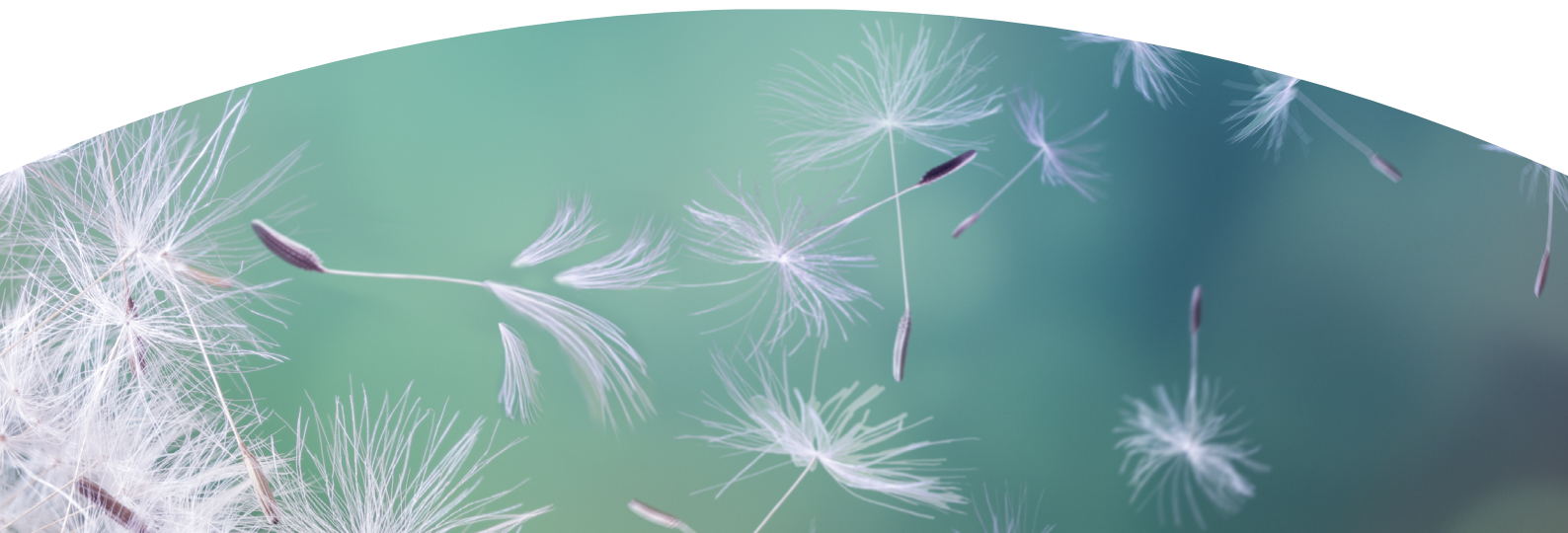
- Biodiversity
- Energy & Greenhouse Gases
- Environmental Pollution
- Product End of Life
- Waste Management
- Waste Stewardship

SOCIAL

- Diversity, Equity, Inclusion, and Belonging
- Human Rights
- Investing & Educating
- Responsible Material Sourcing
- Workforce Health & Safety
- Recruitment, Retention, and Promotion

GOVERNANCE


- Antitrust
- Economic Performance
- Risk Management
- Ethics & Anti-Corruption
- Trade and Politics
- Transparency




Based on those ESG topics, the needs and expectations of internal and external stakeholders were addressed, and research was conducted on the most pressing ESG opportunities and challenges. The output of that work resulted in ratings of the relative level of impact of ESG topics on Sprinklr's business success.




Results were then synthesized and assigned a rating in accordance with the table above, in alignment with Sprinklr's corporate goals. The output of the ESG prioritization assessment identified seven impactful topics to drive Sprinklr's ESG program:

- 


Enterprise Risk Management

Consistently and sufficiently identifying, reporting on, analyzing, and managing key risks, including ESG concerns.
- 


Recruitment & Retention

Maintaining an engaged and satisfied workforce through competitive pay and benefits, as well as ongoing development opportunities.
- 


Responsible Procurement

Managing ESG with our vendors to ensure alignment around shared ESG goals.
- 


Economic Performance

Achieving financial objectives through, for example, product innovation and efficient use of resources.
- 

Transparency

Committing to transparency in ESG matters by measuring and monitoring reasonable and appropriate metrics and reporting on ESG performance.
- 

Belonging

Promoting a culture of belonging by supporting an inclusive, diverse, and equitable workforce where all Sprinklrites are valued. This includes ensuring equal opportunity and pay equity for all.
- 

Energy & Greenhouse Gas Emissions

Reducing total energy consumption and greenhouse gas emissions through operational improvements and renewable energy enhancements.

These seven focus areas are an important part of Sprinklr's long-term success and reflect the initiatives of highest priority to us and our stakeholders. They are broken out in this report as follows:

ENVIRONMENT:

Sprinklr is committed to supporting the transition to a low-carbon economy and seeks to improve the efficiency and resilience of our operations by reducing our emissions, aligning around sustainable practices and operations, continuing to drive product innovation and efficient use of resources, and partnering with our vendors on mutual goals.

SOCIAL:

Sprinklr is committed to fostering a culture of belonging by supporting an inclusive, diverse, and equitable workforce and providing all Sprinklrites with opportunities to be successful and happy, while growing and developing their careers.

GOVERNANCE:

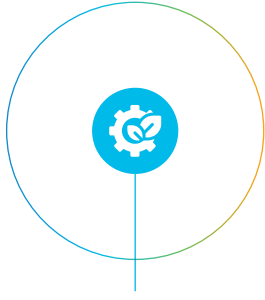
To generate value through sustainable business solutions, Sprinklr seeks to design and deliver end-to-end solutions that meet the challenges of today's digital economy, including security, data privacy, and responsible AI practices by emphasizing corporate governance, ethics, compliance, and risk management.

We are also committed to continued transparency on ESG matters and seek to continue aligning our priorities with stakeholder expectations, market trends, and business risks and opportunities.



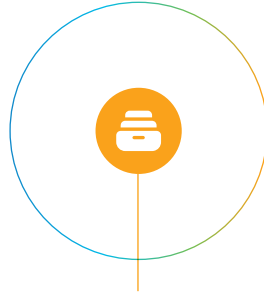
ENVIRONMENTAL

As a cloud-based SaaS provider with a primarily remote workforce, the key drivers for Sprinklr's environmental impact are data hosting, customer use of our platform, business travel, and our own vendors. Sprinklr's environmental strategy accounts for our business needs and customer requirements and seeks to balance those alongside minimizing Sprinklr's impact on the environment. Sprinklr aims to, where feasible, reduce our greenhouse gas emissions, conserve energy, minimize waste, and leverage recycled materials.



Sustainability Consultant

Sprinklr works with an external sustainability consultant who supports the design and implementation of Sprinklr’s environmental goals and facilitates Sprinklr’s reporting.



Governance

Sprinklr has a Global Health, Safety & Sustainability Policy that applies to all Sprinklr employees and office locations globally.



Data Collection

Sprinklr performed an initial Greenhouse Gas (GHG) inventory on data from calendar year 2019 to set our baseline.

CARBON FOOTPRINT

Sprinklr calculated its Carbon Footprint for 2019 and 2022 using the organizational approach, which included locations over which Sprinklr has operational control. This organizational carbon footprint assessment included Scope 1, 2, and 3 emissions, calculated in metric tons of carbon dioxide equivalent (mtCO₂e).

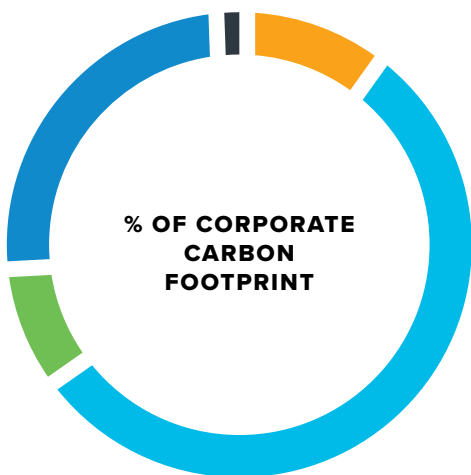
The accounting and reporting procedures used to quantify and report on Sprinklr’s GHG emissions are based on the GHG Protocol Corporate Accounting and Reporting Standard — Revised Edition (GHG Protocol), as developed by the World Resource Institute and the World Business Council for Sustainable Development. Data used to calculate emissions was based either on activity collected directly from Sprinklr or robust estimates made with partial data, using appropriate assumptions which were then multiplied by relevant and up-to-date emissions factors.

	2019	2022	Changes Since Baseline
Total Sprinklr Employees	1500	3245	+ 1745 employees
Total Sprinklr Emissions (mtCO ₂ e)	9761,2	9094,0	-7%
Emissions per Sprinklr Employee (mtCO ₂ e)	6,51	2,80	-43%



Sprinklr's total carbon emissions in 2022 were 9094,0 mtCO₂e, which is broken out as follows between Scope 1, Scope 2, and Scope 3 emissions:

Scope	TCO ₂ e	% of total emissions
Scope 1 mtCO ₂ e	0,0	0%
Scope 2 mtCO ₂ e (location)	896,91	10%
Scope 2 mtCO ₂ e (market)	815,45	9%
Scope 3 mtCO ₂ e	8197,31	90%



- Scope 1: Stationary Combustion
- Scope 2: Purchased Electricity and Heat (Location)
- Scope 2: Purchased Electricity and Heat (Market)
- Scope 3: Purchased Goods & Services
- Scope 3: Capital Goods
- Scope 3: Fuel & Energy Related Activities
- Scope 3: Upstream Transportation & Distribution
- Scope 3: Waste Generated in Operations

Assurance of Data: Better Together has verified the data provided by Sprinklr and calculated Sprinklr's carbon footprint in 2019 and 2022 using the GHG Protocol Methodology and Emission Factors coming from the Environmental Protection Agency (EPA), Department for Environment, Food & Rural Affairs (DEFRA), French Environment and Energy Management Agency (ADEME), and Intergovernmental Panel on Climate Change (IPCC). Please refer to Appendix B, below, for more information.



SPRINKLR'S ONGOING COMMITMENT TO MANAGING ENVIRONMENTAL IMPACT

In 2023, Sprinklr:



Submitted to CDP

Sprinklr scored within the average for U.S. companies within our industry and sector.



Committed to Near Term Goals with SBTi

Sprinklr's reduction plans are underway and will be submitted to SBTi for review & approval.



Received Platinum Recognition from EcoVadis

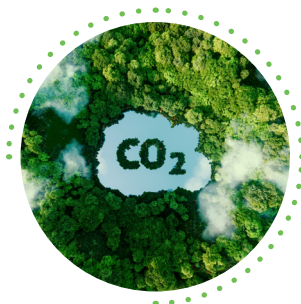
The platinum recognition places Sprinklr in the top 1% of all EcoVadis participants.

In 2024, Sprinklr plans to increase focused efforts on:



Energy Consumption

- Measuring and reporting on significant energy consumption using methods defined in internationally agreed standards.
- Working to achieve energy savings where possible and feasible, including through the purchase of energy efficient goods.



CO2 Emissions

- Measuring and reporting on significant CO2 emissions using methods defined in internationally agreed standards.
- Identifying primary sources of CO2 emissions and working to reduce emissions.



Waste

- Measuring and reporting on significant contributors of waste.
- Working to implement resource efficiency measures to reduce production of waste using best practice indicators.
- Promoting the use of recycled materials and sustainable consumption.



Water Consumption

- Measuring and reporting on significant contributors of water consumption.
- Working to implement efficiency measures to reduce water consumption.

Sprinklr will continue working towards our environmental sustainability goals with the ESG Advisory Team and external consultant, with a goal of continued year-over-year improvements in our environmental sustainability practices.

SPRINKLR OFFICES



New York City
Americas HQ



London
EMEA HQ



Singapore
APAC HQ



Dubai
Growth Markets HQ



Offices in
25 countries



Living in
24 time zones



Speaking
27 languages

Sprinklr's Global Health, Safety & Sustainability Policy outlines our commitment to maintaining a safe workplace, reducing the environmental impact of our physical operations, minimizing waste and emissions, and conserving water and energy use where possible. Sprinklr's dedicated Global Workplace team prioritizes these principles throughout Sprinklr's offices, facilities, and physical locations by:

- ✓ Taking steps to identify, assess, and remediate hazards and unhealthy working conditions;
- ✓ Striving to manage Sprinklr workplaces in accordance with Sprinklr's stated sustainability goals;
- ✓ Responding to matters that pose a risk to the health or safety of Sprinklrites; and
- ✓ Ensuring that accidents, incidents, and dangerous occurrences or "near misses" are investigated with suitable corrective action to prevent recurrence.

Sprinklr's global real estate strategy looks to establish Sprinklr offices in central areas which are easily accessible by public transit systems. While Sprinklr's work-life flexibility enables in-office, remote, and hybrid work, Sprinklr offers shuttle services in our Bangalore and Gurugram offices and encourages shared transportation options elsewhere to reduce emissions. Sprinklr's facilities team is continuously assessing company growth, regional footprint, and office occupancy to accommodate flexible and hybrid work arrangements and reduce Sprinklr's carbon footprint.

Sprinklr is also focused on using reusable, recycled, and environmentally-friendly materials in the design and build of offices, including energy efficient electrical and light fixtures for new offices in UAE and India. Sprinklr is committed to following the same strategy in future office buildouts, including our new global headquarters in New York City. In addition, Sprinklr offices are designed and built in compliance with local and international regulations, including building and National Fire Protection Association (NFPA)-equivalent codes, and Sprinklr is pursuing a Leadership in Energy and Environmental Design (LEED) certification for office locations in Dubai, New York, and Gurugram, India.

Over the last three years, Sprinklr has:

Reduced spend on in-office meals by **75%** through the adoption of a more rigorous inventory and order management process.

Reduced office supply spend by **40%** year over year.

Achieved a **58%** reduction in spend associated with technology consumables.

SPRINKLR & THE CLOUD

As a SaaS company with a global customer base, we are committed to delivering our products and platform via cloud-based solutions. All of Sprinklr's products and platform run on the public cloud using virtual servers for our customers. As a full-service CXM tool, we believe our services can help our customers reduce their own carbon footprints as they migrate towards cloud-based solutions.

Sprinklr's cloud providers are actively moving towards renewable energy, which will enable Sprinklr to get power usage metrics and understand the total energy attributed to our use. Sprinklr plans to assess those metrics and put in place efforts to reduce those emissions as part of our overall carbon reduction targets and environmental programs. In addition, Sprinklr will continue partnering with our cloud vendors to increase our ability to measure the carbon footprint associated with running the Sprinklr platform, including identifying opportunities to optimize our usage. More information about each cloud provider Sprinklr uses for hosting our platform can be found on our [Subprocessor page](#), as well as each of the cloud provider websites ([AWS](#), [Azure](#), [GCP](#)).

SUSTAINABLE PROCUREMENT

Sprinklr recognizes the importance of integrating ethical, social, and environmental criteria into our purchasing and contracting policies and encouraging organizations in our sphere of influence to place a similar focus on ESG initiatives. All third parties with whom we contract must comply with all applicable laws, regulations, and professional standards, including those related to employment and labor rights, anti-corruption and sanctions controls, and health, safety, and environmental protections. Suppliers also must undergo privacy and security due diligence (as applicable for their scope) to assess the security and reliability of their processing activities, and where necessary, must agree to a data protection agreement that also obligates them to certain security protections.

Sprinklr has a published Supplier Code of Conduct, which outlines the expectations we have of our suppliers with respect to environmental practices, anti-harassment, union membership, fair wages and fair working hours, anti-corruption safeguards, workplace safety, training, and use of responsibly sourced materials. The Supplier Code of Conduct can be reviewed [here](#).

To date, Sprinklr has annually monitored our top ten suppliers, based on total expense and strategic offering, assessing their compliance with health and safety industry and regulatory requirements, their reliability, and their certifications related to corporate responsibility or environmental impact management. Over the course of the next year, Sprinklr will make efforts to expand this assessment to additional suppliers to better assess supplier carbon footprint, waste, water, and energy consumption. In addition to these efforts, we seek to enable additional due diligence and monitoring of the organizations with whom we contract and partner with to assess their continued alignment with Sprinklr's ESG goals.



SOCIAL

SPRINKLR'S CULTURE OF BELONGING

At Sprinklr, we foster a **culture of belonging** in everything we do. We celebrate individual differences as assets; seek to hear unique perspectives because it helps us live our values; seek to understand; and believe we are stronger when we belong because collectively, we're more innovative, creative, and successful. Sprinklr's culture of belonging emphasizes the importance of looking beyond visible differences and recognizes the richness of diverse perspectives and experiences that contribute to a more inclusive and comprehensive understanding of individuals and groups within the workplace. Throughout, this is what diversity means to us.

Our goal is to ensure all Sprinklrites feel like they belong and are valued for who they are. We fervently believe every employee matters, should be respected and listened to, and should have opportunities to contribute to the magic of Sprinklr. As we continue our journey, we know that bringing together diverse talent leads to better company-wide innovation, improved financial results, and better decision-making.

We Belong | **Vision**



To create a culture in which we embrace one another for who we are.

We Belong | **Mission**



To value and respect one another for bringing our whole, authentic selves to work every day. Be yourself. We celebrate YOU.

We Belong has 3 focus areas:



RECRUIT

Sprinklr seeks to build candidate pipelines and diverse slates from high performing talent with diverse backgrounds and experiences. Sprinklr recognizes the importance of inclusion for all, especially for early-in-career talent and our global internship programs.



EDUCATE & INVEST

Sprinklr maintains a consistent focus on educating and training Sprinklrites on our We Belong principles, ensuring equitable investment in the development of leaders and all members of the Sprinklr community. This commitment is evident through new hire training and annual compliance refresher courses, which cover topics such as harassment, discrimination, behavioral-based interviewing, and bias courses.



CAPTIVATE

Sprinklr recognizes the value in shared stories and experiences and seeks to engage and bring together talent from all backgrounds. In addition to Sprinklr's We Care teams, outlined in more detail later in this report, Sprinklr has also launched our **What's Your Story** program, to strengthen our culture of belonging by better understanding our colleagues. This program encourages Sprinklrites to foster a deeper connection with their colleagues by learning about each other's life journeys and what made them who they are today.

HIRING AT SPRINKLR

Sprinklr's goal is to attract high performers who align with The Sprinklr Way and who are kind, caring, and customer obsessed. We seek to create a workplace for individuals with a strong passion for continuous learning, a desire to help others succeed, a dedicated commitment to making a significant difference, and the ability to envision beyond the obvious and unlock their full potential.

Sprinklr's focus on a culture of belonging extends to diverse and inclusive interview teams. Recruiters and hiring managers are trained on how to interview and hire in alignment with The Sprinklr Way, which includes behavioral-based interviewing guidelines and competency-based interviewing. Sprinklr also reviews compensation to validate fair and consistent compensation and conducts recurring pay equity analyses as part of our annual salary merit process.



A WORKPLACE FREE FROM DISCRIMINATION AND HARASSMENT

The Sprinklr Way asks that all Sprinklrites passionately and genuinely care for one another. Sprinklr is committed to providing an inclusive work environment premised on respect, trust, and collaboration where Sprinklrites are safe to be themselves. We treat individual differences as assets and work to maintain a workplace free of harassment, discrimination, or retaliation. All Sprinklrites are trained on how to recognize and prevent harassment, discrimination, and retaliation in the workplace upon hire and annually thereafter in refresher training.

As outlined in Sprinklr's Global Harassment & Discrimination Policy, we strictly prohibit discrimination or harassment based on any legally protected category such as race, gender, national origin, religion, age, sexual orientation, gender, pregnancy, disability, marital status, or veteran status. Our governance also includes a framework for investigating and responding to employee concerns. Sprinklr maintains an [anonymous Ethics Hotline](#) which is managed by an independent third party and is available to anyone who wishes to report concerns, including those related to discrimination, harassment, or retaliation.

EMPLOYEE WORKING CONDITIONS

Sprinklr's Global Health, Safety, and Sustainability Policy outlines our commitment to maintaining a safe workplace, including ethical employment and treating all Sprinklrites with dignity and respect.

ETHICAL EMPLOYMENT

At Sprinklr, employment is freely chosen, and we do not use any form of forced, bonded, involuntary, or child labor. Freedom of association and collective bargaining, where permitted by law, is respected, and Sprinklr does not hinder such activities. Further, working hours comply with local legislation, including minimum wage requirements. For more information, please refer to the [Governance section](#) below.

PURPOSEFUL GATHERING

Sprinklr supports a flexible work-life framework that promotes happiness and well-being and seeks to keep all Sprinklrites equally enabled and engaged — and equally positioned for advancement opportunities — regardless of the employee's work location.

We encourage purposeful in-office gathering and actively work to engage remote employees through **Splash**, our thoughtfully designed orientation program that emphasizes the cultural component of joining Sprinklr.

We also host live and virtual events for Sprinklrites globally, known as **Homecoming**. Homecoming fosters employee engagement, unity, and alignment with The Sprinklr Way and is designed to be inclusive and engaging with career panel discussions, team-building activities, and networking gatherings.

THE WAY WE WORK



VISION

The **Way We Work** is anchored in The Sprinklr Way, and serves to foster **employee productivity, creativity, and work-life flexibility**.



MISSION

To enable **opportunities for gathering and connection** in a clear, organized way, anchored in task-based, **purposeful gathering**.



Purposeful In-Office



Hybrid



Remote

EMPLOYEE BENEFITS & REWARDS

Sprinklr provides comprehensive health plans, leading well-being programs, and financial protection for Sprinklrites and their families through a variety of salary continuance, time off and holiday programs, and income protection plans.

We know that when Sprinklrites are at their best, their positivity and happiness extend beyond work into their home life and beyond — amplifying the greater good. Depending on where Sprinklrites live around the world, benefits include:

- Insurance (medical, dental, disability, critical illness, life, and accidental death)
- Retirement or pension plans
- Employee Assistance Program
- Well-Being Program
- Global Leaves of Absence, as well as collective company-wide recharge days per year.

Sprinklrites also have access to global mental health programs and lifestyle support through employee assistance and evidence-based coaching and counseling programs. Additionally, Sprinklr provides global family planning and fertility benefits, giving all Sprinklrites access to quality family planning care, no matter their gender identity or sexual orientation.

SPRINKLR HAPPIER

Happier is a Sprinklr-built and run program that leverages the latest advances in neurobiology, performance science, and aspects of yoga & ayurveda to enable participants to accomplish personal and professional goals while striving for happier living. This is a 21-day / 15-minute-per-day program and is introduced to all new hires during onboarding.



TOTAL REWARDS PHILOSOPHY

Compensation and employee rewards are key components in attracting and retaining key talent to strengthen Sprinklr's success. Our total rewards philosophy is built on providing holistic rewards for high performers who are kind and caring, through fair and consistent methodologies.



Pay equity at Sprinklr is based on compensable factors such as local market, role, performance, and contributions. Compensation is regularly reviewed to monitor controls and adjust, as needed. Sprinklr also conducts a global statistical analysis to evaluate pay equity as part of Sprinklr's annual salary merit process. Sprinklr's compensation packages include a base salary component and, depending on the job, a variable pay component, as well as equity. Restricted stock units may be awarded to Sprinklrites for their significant and unique contributions, performance, and potential under Sprinklr's equity plan. Sprinklr also has an Employee Stock Purchase Program (ESPP) which full and part-time employees can participate in to purchase Sprinklr stock at a discounted price in eligible countries.

Sprinklr values transparency and provides education, training, and support to Sprinklrites about compensation, including disclosures on our intranet to enable Sprinklrites to understand the compensation programs and easily locate relevant contact information.

SPRINKLRITE DEVELOPMENT, GROWTH, AND RECOGNITION

Sprinklrites are encouraged to take charge of their careers, identify opportunities to develop their skill sets, and take steps to achieve their individual aspirations through training programs, workshops, mentoring, educational resources, and career plans, including:



Employee Delight Assurance Program (EDAP)

Bi-annual structured conversations between Sprinklrites and their managers to discuss progress towards goals and learning priorities, with a focus on employee satisfaction and happiness.



Career Development Workshops

Offered to help Sprinklrites in their career growth and development, including the Clifton Strengths assessment, 360 feedback, and Aspire (top talent) development programs.



Mindset, Objectives, Skills, and Activities (MOSAs)

Role-based plans drafted by each Sprinklrite and their manager to outline what "great" looks like in their role.



Internal Mobility Access Program

Sprinklrites are encouraged to apply for roles internally and Sprinklr does not have limitations on how long someone needs to be in their role to move internally.



Learn 2 Grow

Plans focused on each Sprinklrite's development goals, strengths, and skills, as informed by their MOSA.



Additional Access to Educational Resources

Sprinklrites are given access to educational tools (e.g., LinkedIn Learning) for additional online leadership training to complement our leadership sessions.

In addition, Sprinklr recognizes the importance of strong leaders. We place an emphasis on helping people leaders succeed in their own career journey and by empowering their teams through:



TRAINING

All newly promoted people leaders attend live training which covers:

- Business operations
- Setting objectives and driving results
- Enhanced governance and compliance obligations
- Maintaining Sprinklr's culture of high performers who are kind and caring
- Leading with empathy
- Feedback and performance management



RESOURCES

New managers get access to Sprinklr's People Leader Playbook, which outlines the operational responsibilities of people leaders throughout the employee lifecycle, as well as how to deliver on those operational responsibilities.



TRANSPARENCY

Sprinklr holds forums to communicate and educate senior people leaders on real-time expectations based on current business needs, enabling leaders to cascade critical points to their teams.

MENTORING

Sprinklr's award-winning mentorship program, driven by the MentorcliQ platform, had 300+ matched participants in 2023. Sprinklr's commitment to innovation and mentorship earned Sprinklr a 'Mentoring Luminary Award' in 2023 at MentorcliQ's annual conference.



PEER-TO-PEER RECOGNITION

Sprinklr's peer-to-peer recognition platform, Recognize, lets Sprinklrites celebrate and show gratitude to their colleagues. Sprinklrites can recognize peers who are actively living and leading The Sprinklr Way, contributing significantly to ongoing work or projects, or who are making a substantial impact on their region or departments. We believe peer-to-peer recognition can make an incredible impact by increasing engagement levels, productivity, and retention.

WE CARE TEAMS



We Care teams are employee-led groups that provide a platform for Sprinklrites to connect, support one another, and collaborate on initiatives related to common interests or shared affinity, such as backgrounds, experiences, gender, race, ethnicity, sexual orientation, or disability. We Care is reflective of Sprinklr's goal of embracing the infinite possibilities that our various backgrounds and experiences bring to light.



The We Care teams embody Sprinklr's We Belong vision of creating a culture where we embrace one another for who we are. These teams operationalize the mission of encouraging every employee to bring their whole selves to work every day.

In 2023, Sprinklr had:



7

We Care teams,
2 Subgroups,
and 2 Interest Groups



22

Global We Care events,
including 7 panels and 2
workshops



588+

Members across all
We Care teams



580+

Company attendees
across We Care events



SPRINKLR CARES: SOCIAL IMPACT & PHILANTHROPY

Our Social impact is intricately linked to the well-being of the communities we serve. From fostering a culture of belonging and inclusion to giving to personally meaningful causes, Sprinklrites are a force for positive change in the communities where they live.

Sprinklrites are given two days off per year — 24-4-Others and 24-4-U — which are volunteering and developmental days that allow Sprinklrites to spend time on causes and opportunities important to them. Sprinklrites in Bangalore dedicated their 24-4-Others time volunteering at the Sankalp Blood Center, learning about the resilient stories of the center’s patients and organizing fun activities to bring happiness to the community. In California, Sprinklrites dedicated time, money, and supplies to a local organization empowering individuals, families, and communities to act against violence and abuse.

Sprinklr also supports philanthropic efforts through Sprinklr Cares, a purpose-driven volunteering and donation platform that allows Sprinklrites to give back to organizations that are near and dear to them. Through Sprinklr Cares, Sprinklrites can manage and track their charitable giving, volunteering, and other philanthropic activities, allowing them to contribute and amplify their impact to charitable causes closest to their hearts.

\$19k+

For Giving Tuesday 2023, Sprinklr matched donations to raise a total of \$19,389 in support of causes that mean the most to Sprinklrites and their communities.

23k+

Meals donated to date by Sprinklrites in our New York and Austin offices through the Sharebite platform.



GOVERNANCE

We know that Sprinklr’s continued growth and success requires a commitment to corporate governance and a formal program that oversees and promotes ethical behavior and integrity throughout the organization. The core of Sprinklr’s governance program is our [Code of Conduct and Ethics](#) (the “Code”), which is rooted in The Sprinklr Way and requires Sprinklrites to operate in a lawful, conscientious, and transparent manner. In addition, Sprinklr’s governance program supports compliance with global laws and regulations, including those related to security and data privacy. Sprinklr’s Legal, Security, and Compliance functions continuously assess governance priorities and manage risk alongside internal stakeholders. That review process, as well as all relevant findings, are reported to Sprinklr’s Disclosure and Audit Committees, which allows for transparency and oversight.

SPRINKLR'S BOARD OF DIRECTORS AND COMMITTEES

Sprinklr's Board of Directors ("Sprinklr's Board") oversees our operations and corporate governance. As of the publication date of this report, Sprinklr's [eight person Board](#) consists of six independent directors and two executive directors: Sprinklr's Founder, CEO and Chairman of the Board, Ragy Thomas, and Sprinklr's Interim Chief Operating Officer, Trac Pham. All Sprinklr Board members are subject to Sprinklr's [Corporate Governance Guidelines](#) which, amongst other things, require that the Board have a majority of independent directors and that Board members possess sufficient relevant expertise upon which to offer advice and guidance to management, demonstrated excellence in their field, the ability to exercise sound business judgment, and a diverse personal background, perspective, and experience.

Sprinklr's Board meets at least quarterly with senior management to review business, governance, and regulatory updates and to provide oversight on enterprise risk, including cybersecurity risk. Sprinklr's Board is comprised of the following committees, and Sprinklr's Nominating & Corporate Governance Committee provides oversight over Sprinklr's ESG program:

<h3>Audit Committee</h3> <p>Responsible for oversight of Sprinklr processes related to corporate accounting, financial reporting, and internal controls, as well as Sprinklr's financial systems and regulatory compliance.</p> <p>Sprinklr's Audit Committee also reviews and assesses the quality and effectiveness of Sprinklr's cybersecurity and data privacy program, including the review and assessment of cybersecurity risks.</p>	<h3>Compensation Committee</h3> <p>Responsible for approving the compensation of executive officers and providing oversight over Sprinklr's risks and policies related to compensation, recruiting, and retention of executive officers, as well as Sprinklr's overall compensation philosophy and strategy.</p>	<h3>Nominating & Corporate Governance Committee</h3> <p>Responsible for identifying candidates for director nominees and evaluating candidates against Sprinklr's minimum qualifications. In addition, this committee provides oversight over the annual performance of Sprinklr's Board and our committees.</p> <p>Sprinklr's Nominating and Corporate Governance Committee also oversees Sprinklr's ESG efforts, strategies, and practices.</p>
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For more information on Sprinklr's Board, the skills and experience of each member, and stockholder engagement, please refer to Sprinklr's SEC filings, which are available on our [Investor Relations site](#).

SPRINKLR'S CODE OF CONDUCT AND GOVERNANCE

Sprinklr's [Code of Conduct](#) reflects our commitment to protecting our culture and reputation, operating ethnically and with integrity, and helping our customers build beloved brands. Our Code covers important topics such as:

- Compliance with applicable laws in all jurisdictions where Sprinklr operates
- Maintaining accurate corporate records and the importance of financial integrity
- Engaging ethically with our customers, partners, and vendors
- Respecting, protecting, and promoting human rights
- Creating a safe and inclusive workspace

Every employee, officer, director, and third party acting for or on behalf of Sprinklr must read, understand, and follow Sprinklr's Code, which is available on the governance portion of Sprinklr's [Investor Relations site](#). Sprinklr's Board is charged with reviewing and approving the Code annually.

Sprinklr also maintains a governance framework of Policies, Standards, Procedures, and Guidelines (collectively, "Sprinklr Governance") that outline the laws Sprinklr must follow, internal controls and processes which enable compliant business operations, and channels for reporting non-compliance. Sprinklr Governance is managed by Sprinklr's compliance team and reviewed annually by the relevant business stakeholders, Chief Compliance Officer, and/or Sprinklr's Board. Sprinklr Governance is internal and published on a centralized intranet site for Sprinklr access.

Sprinklr's Governance includes, but is not limited to, compliance frameworks on:

ANTI-CORRUPTION & BRIBERY

Sprinklr's Anti-Corruption Policy requires compliance with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, as well as all other applicable laws prohibiting bribery or corruption in countries where Sprinklr otherwise operates or conducts business. The Policy provides safeguards around meals, entertainment, engagement with foreign officials, and any other conduct which may create an appearance of impropriety. The Policy is clear that Sprinklr does not tolerate corruption, bribes, or kickbacks in our business dealings. All Sprinklr review and certify their ongoing compliance with the Anti-Corruption Policy upon hire and annually thereafter, and the Policy is reviewed annually and approved by Sprinklr's Board.

INSIDER TRADING

Under Sprinklr's Insider Trading Policy, employees, officers, and directors who have access to Sprinklr's material non-public information are not permitted to use or share that information for stock trading purposes. Further, Sprinklr are not permitted to recommend that others buy, hold, or sell securities based on confidential information. Sprinklr has internal processes and controls in place to manage black-out windows and pre-clearance for trading, which are managed by Sprinklr's Legal and Finance teams.

ANTI-TRUST LAWS, FAIR COMPETITION, AND FAIR DEALINGS

At Sprinklr, being customer obsessed with a hyperfocus on value means that we are confident our customers will choose us because of our exceptional products, and we follow applicable anti-trust and fair competition laws. Our governance requires Sprinklr to deal fairly with our customers, and suppliers. In addition, Sprinklr involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service, and reputation, and not on the receipt of special favors.

ANTI-DISCRIMINATION AND HARASSMENT

Sprinklr is committed to providing an inclusive work environment where Sprinklrites are safe to be themselves. As outlined in Sprinklr's Global Harassment & Discrimination Policy, we strictly prohibit discrimination or harassment based on any legally protected category such as race, gender, national origin, religion, age, sexual orientation, gender, pregnancy, disability, marital status, or veteran status. Our governance also includes a framework for investigating and responding to employee concerns.

HUMAN RIGHTS

Sprinklr is committed to respecting internationally recognized human rights in our operations, as reflected in our adherence to the United Nations Global Compact (UNGC) and compliance with the Modern Slavery Act, amongst other related regulations. Sprinklr's Global Health, Safety & Sustainability Policy obligates compliance with applicable fair labor practices related to child labor, working hours, minimum wage, and collective bargaining rights. We are committed to practices that combat modern slavery and human trafficking, and to working with and encouraging suppliers to uphold the same principles. Sprinklr also seeks to hold our contractors, suppliers, and other business partner to the same standards, and we expect our vendors to conduct employment practices in compliance with all applicable laws. Sprinklr's full Modern Slavery Statement is available [here](#), and our Supplier Code of Conduct can be found [here](#)

COMPLIANCE TRAINING

Sprinklr's training program ensures that Sprinklrites complete training on Sprinklr's Code, Sprinklr Governance, applicable laws and regulations, industry security best practices, and any current or anticipated risks to Sprinklr. All Sprinklrites are trained upon hire through live training and training modules, and all Sprinklrites must complete annual refresher training each year thereafter. Both new hire and refresher training is deployed through Sprinklr's learning management system to enable tracking of completion, and both require that Sprinklrites certify their compliance to Sprinklr's Code and Sprinklr Governance.

100%

In 2023, 100% of Sprinklrites completed all required compliance training.

7,000 hours

In 2023, Sprinklrites took over 7,000 hours of required compliance training.



SPEAKING UP AND REPORTING NON-COMPLIANCE

All Sprinklrites are encouraged to promptly report good-faith complaints, policy violations, or concerns through Sprinklr's reporting channels:



Sprinklr's Culture & Talent Team



Sprinklr's Security Team



Sprinklr's Legal & Compliance Team



Sprinklr's Chief Compliance Officer



Sprinklr's Anonymous Ethics Hotline

Sprinklr's Ethics Hotline is managed by a third party and allows reporters to remain anonymous, where permitted by law. You can find more information on how to submit a report to our Ethics Hotline [here](#). Sprinklr does not tolerate retaliation against employees for reporting a concern in good faith or participating in an investigation.

RISK MANAGEMENT AND MITIGATION

Sprinklr's risk management is comprehensive, aligned to corporate activities, embedded into common routine activities, and responsive to changing environments. Sprinklr's Legal and Governance, Risk, and Compliance (GRC) functions conduct regular risk assessments to identify the most significant risks that could affect our business operations. Sprinklr's risk management process includes: (a) risk identification, which requires meeting with internal stakeholders to identify risks; (b) risk evaluation, which considers the likelihood and impact of the risk to the organization, and (c) risk treatment, which determines, based on the residual risk and likelihood, what the risk treatment will look like. Where risk treatment plans require further action by stakeholders, those plans are managed and overseen by Sprinklr's GRC team. All material risks to the company are assessed through Sprinklr's Disclosure Committee and presented to the Audit Committee of Sprinklr's Board for oversight on at least a quarterly basis and re-evaluated at regular intervals.

CYBERSECURITY AND DATA PRIVACY

We know that security, compliance, and privacy are the cornerstones of the trust that our customers and investors place in us. Sprinklr is committed to safeguarding our information assets and the security and privacy of our customers' data. Detailed information on Sprinklr's privacy and security program can be found on our [Trust Center](#)

DATA PRIVACY

Sprinklr recognizes the importance of safeguarding personal information — including information provided to us by customers and information we incorporate from social media channels within our products. We're committed to protecting this information and, in accordance with our Data Processing Agreements, only using such data to provide our customers with the Sprinklr platform.

Sprinklr's dedicated Privacy team, along with our external Data Protection Officer, assess privacy requirements across our products and business practices in line with the evolving regulatory landscape. Sprinklr's privacy program is rooted in the following guiding principles:

- ✔ Processing personal data fairly, lawfully, and transparently
- ✔ Accountability for personal data processing
- ✔ Limiting processing to the specified and limited purposes agreed to or pursuant to which data was collected
- ✔ Processing personal data only as needed to achieve the specific purpose
- ✔ Maintaining the accuracy of personal data
- ✔ Minimizing the volume of data retained once the processing purpose has been achieved
- ✔ Implementing measures to secure and safeguard data
- ✔ Respecting the rights and requests of individuals whose data is processed

A FOCUS ON TRANSPARENCY



Privacy Notices

Where Sprinklr collects data as a controller from web visitors or applicants, our Privacy Policies will be applicable. Sprinklr's Privacy Policy is available [here](#), and our Applicant Privacy Policy is available on our recruiting portal [here](#).



Data Processing Agreement

Where Sprinklr processes data as processor or service provider for our customers, we sign a Data Processing Agreement (DPA) to govern the processing of customer data.

Sprinklr's DPA, which includes details on the kinds of data Sprinklr processes on behalf of our customers and our purpose for processing is available [here](#).



Data Protection Officer

Sprinklr partners with a third-party Data Protection Officer to validate and monitor Sprinklr's compliance with data privacy obligations. Our DPO can be contacted at privacy@sprinklr.com.



Trust Center

Our customers can find information relevant to our data privacy program — including white papers elaborating on Sprinklr's processing activities — on our [Trust Center](#).

INTERNATIONAL DATA TRANSFERS

As a service provider for global enterprise customers, Sprinklr's DPA anticipates the need for cross-border data transfer safeguards. Our DPA leverages EU Standard Contractual Clauses and the UK Data Transfer Addendum to safeguard data transfers from the EEA or UK to third countries. A detailed Data Transfer Impact Assessment can be found in Sprinklr's White Paper on International Transfers, available on our [Trust Center](#)



Sprinklr is also certified to the EU-US Data Privacy Framework to enable personal data transfers between the EU and the US.

USE OF THIRD-PARTY SUBPROCESSORS

Sprinklr engages trusted third parties to support certain features or services. Subprocessors may access limited customer data for the purpose of delivering the services Sprinklr has retained them to provide. Subprocessors are contractually prohibited from using customer data for any other purposes, and Sprinklr puts subprocessors through robust due diligence with the support of its Procurement, Legal, Security, Privacy, and Compliance teams. Sprinklr undertakes to use a commercially reasonable selection process by which it evaluates the security, privacy, and confidentiality practices of subprocessors that will or may have ancillary access to or process customer personal data. Customers can subscribe to get updates on any changes to Sprinklr's list of subprocessors and learn more about how subprocessors support our products and where they are located by visiting our [subprocessor page](#).

CYBERSECURITY

Sprinklr has a dedicated Security team chartered to define, supervise, implement, and monitor all relevant security policies, standards, and controls. Our dedicated Detection and Response team is tasked with 24/7 monitoring of Sprinklr's platform, and we abide by industry best practices, compliance regulations, and all applicable laws. Periodic tests by independent third parties (such as third-party auditors, assessors, penetration testers, etc.) are organized and conducted under the guidance of Sprinklr's Security team.



Secure Development Lifecycle Process

Sprinklr's platform is developed by employees who receive regular training on secure coding practices. Sprinklr follows the Open Web Application Security Project (OWASP) standard security controls and other industry-standard control systems for application security.

Detection & Response

Sprinklr's dedicated Detection & Response team is focused on threat detection engineering, vulnerability management, incident response, and crisis communication management to support customers in security incidents and beyond.

Infrastructure Security

Sprinklr's production environment is virtual, running in an Infrastructure-as-a-Service (IaaS) third-party cloud environment, and those third-party partner controls are leveraged for IaaS security.

Network Security

The Sprinklr team monitors network activity for anomalies 24/7, and proactive controls such as firewalls, cloud security posture management, and network penetration testing are in place to drive a high degree of protection.

Product Security Features

Sprinklr enables industry-standard controls to help protect our customers and their data. Security features include role-based access permissions, access controls, single sign-on, two-factor authentication, IP restricted access, and more.

Vulnerability Disclosure Program

Sprinklr utilizes a third-party Vulnerability Disclosure Program (VDP) for managing security vulnerabilities reported by the security community. More information on Sprinklr's Responsible Disclosure Program can be found [here](#)

Cybersecurity Certifications

Sprinklr is regularly audited by third-party assessors to evaluate internal controls that protect the security, confidentiality, integrity, availability, and privacy of the information entrusted to us by our customers. Sprinklr is certified to:



Sprinklr has also been audited by a third party for compliance with the [HIPAA privacy and security rule](#) for certain product features.

For more information about Sprinklr's security certifications, please visit Sprinklr's [Trust Center](#) to view and download all relevant information.

SECURITY AWARENESS & TRAINING

We believe that our employees are our first and strongest defense against cyber threats. As a result, Sprinklr employees are trained on security measures upon hire and annually thereafter as part of mandatory refresher training. In addition, Sprinklr's Security team conducts phishing simulation training and regularly shares educational security content and relevant best practices to drive awareness, reduce risk, and remain vigilant against potential threats.

CRISIS MANAGEMENT

Sprinklr's Security Incident Response Plan, along with our Crisis Management Plan, enable Sprinklr's rapid and cross-functional response to detected issues or threats, including timely notification. Crisis response at Sprinklr is managed by Sprinklr's Legal, Security, and Communications teams who jointly root cause assessments, develop and execute upon remediation plans, conduct ongoing monitoring of issues, and communicate matters to customers, Sprinklr's Data Protection Officer, and other relevant third parties. All Sprinklrites are trained on their obligations under Sprinklr's Crisis Management Plan upon hire, annually as part of our compliance refresher training, and periodically through the year through ad-hoc security training. Sprinklr also conducts an annual breach tabletop exercise to test incident response plans.

PRODUCT DEVELOPMENT & RESPONSIBLE AI

ACCESSIBILITY IN PRODUCT DEVELOPMENT




Sprinklr's dedicated Accessibility team evaluates and tests our products against the Web Content Accessibility Guidelines (WCAG) 2.1 AA success criteria. WCAG Conformance Level AA is currently on our roadmap. Our Voluntary Product Accessibility Template (VPAT) reports and Accessibility Conformance Statement can be found on our [Trust Center](#)

RESPONSIBLE AI

Sprinklr has been using Artificial Intelligence ("AI") to power our products for almost a decade, and while the legal and regulatory framework around AI are still in development, we have always appreciated the need for responsible AI development. At Sprinklr, this means building AI while considering the wider societal benefits, fostering ethical development and use, and taking steps to minimize risk and harm. We believe that ethical and responsible AI development will support innovation and increase trust in AI, and we plan to continue innovating and creating maximum efficiencies for our customers using AI designed with governance, security, and privacy in mind.

In 2023, Sprinklr established a cross-functional Responsible AI Governance Committee across Product, Engineering, Legal, Security, Marketing, and Customer Support teams. The Committee's objective is to formalize Sprinklr's responsible AI strategies and enable enhanced transparency documentation.

Responsible AI at Sprinklr is focused on three core pillars:

 <p>TRUST</p> <p>We are committed to enabling transparency, fairness, accountability, and a human-centric approach to our AI development.</p>	 <p>INTEGRITY</p> <p>We are focused on secure development of AI and continuing to innovate with security and safety as guiding principles.</p>	 <p>PARTNERSHIP</p> <p>We value and welcome customer and industry partnership, support, and feedback as AI regulations, industry needs, and innovative use cases continue to develop.</p>
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We are committed to continuing to evolve and iterate on our multi-pronged strategy that incorporates ethical guidelines, data privacy, and transparency within AI and sharing those updates with our customers and stakeholders. Our approach is intended to lay the groundwork for compliance with relevant regulations while still facilitating new and innovative uses of AI to maximize our customer's workflows.



CONTACT

For more information on Sprinklr's ESG efforts or any of the information in this report, please reach out to sustainability@sprinklr.com.



APPENDIX A — GLOBAL REPORTING INDEX (GRI) STANDARDS 2021 (CORE OPTION)

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401-1 New employee hires and employee turnover

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403-1 Occupational health and safety management system

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403-6 Promotion of worker health

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404-1 Average hours of training per year per employee

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GRI 405: Diversity and Equal Opportunity 2016

405-1 Diversity of governance bodies and employees

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406-1 Incidents of discrimination and corrective actions taken

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407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

[19, 23, 30-33](#)

CHILD LABOR

GRI 408: Child Labor 2016

408-1 Operations and suppliers at significant risk for incidents of child labor

[19, 23, 30-33](#)

FORCED OR COMPULSORY LABOR

GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	19, 23, 30-33
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SECURITY PRACTICES

GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	32-33, 36
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SUPPLIER SOCIAL ASSESSMENT

GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	18
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CUSTOMER HEALTH & SAFETY

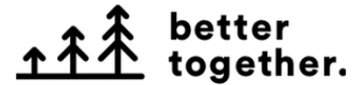
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	19, 29-37
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	32-33, 37

CUSTOMER PRIVACY

GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	32-33, 37
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APPENDIX B — BETTER TOGETHER ASSURANCE STATEMENT



Assurance Statement:

Distancias Acessiveis LDA (Better Together Sustainability), has been engaged to provide consulting/advisory services to Sprinklr to support the calculation of Sprinklr 2019 and 2022 Greenhouse Gas Emissions. The service provided includes;

Client: Sprinklr

Date: 23.05.2023 (Start: January 2023: End: July 2023)

Prepared by: Elisa Gómez; Better Together

Project: Sprinklr Carbon Footprint (Scope 1, 2 & 3: Organisational Approach)

Criteria: GHG Protocol

Phase: Carbon footprint calculation for 2019 (Baseline) + 2022; Microsoft Service Level Emissions

Mapping of Emissions considered:

Scope 1, Stationary Combustion

Scope 1, Refrigerant leakages

Scope 2, Purchased electricity and heat (Location)

Scope 3 Cat. 1 Purchased goods and services,

Scope 3 Cat. 2, Capital Goods

Scope 3 Cat. 3, Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2

Scope 3 Cat. 4, Upstream Transportation and Distribution

Scope 3 Cat. 5, Waste Generated in Operations

Scope 3 Cat. 6, Business travel, air travel, train

Scope 3 Cat. 7, Employee Commuting

Elisa Gómez González (Founder, CEO & Consultant)
Distancias Acessiveis LDA (Better Together)

23rd May 2023

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