

C3.AI, Inc.
MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2022

C3.ai, Inc. (“**C3 AI**”) is committed to practising ethical business and upholding internationally recognized standards of human rights.

This is our first modern slavery statement (the “**Statement**”) which has been prepared in accordance with the corporate compliance and reporting requirements set out in Section 54 of the UK’s Modern Slavery Act 2015 (the “**Act**”). The Statement describes the steps taken to address modern slavery as of December 2022 as well as those additional steps and commitments we intend to take in the next 12 months.

The use of the term “modern slavery” in this Statement includes all forms of slavery including forced labor, bonded labor, domestic servitude, sex trafficking, forced marriage and child labor. C3.AI supports the elimination of all forms of modern slavery and the Statement applies to all persons who work for C3.AI including employees, temporary staff, agency personnel, contract workers and interns.

Our Business

C3.AI is the parent company of a wider group of companies (the “**C3 AI Group**”), including C3.AI UK, Ltd. C3.AI, Inc. which was founded and is led by Silicon Valley entrepreneur Tom Siebel. The C3 AI Group leadership team is one-hundred percent committed to the success of our customers and the ethical application of AI.

The C3 AI Group is the world's leading provider of Enterprise AI software for accelerating digital transformation. We deliver a family of fully integrated products to organizations globally.

We have an unwavering dedication to excellence, both to our people and our customers. We are uncompromising in the maintenance of our high standards of financial, regulatory, and cultural integrity. Our commitment to a strong compliance culture is fundamental to our growth as a leading Enterprise AI software provider.

The Organization’s Structure, Business and Supply Chains

The C3 AI Group is headquartered in Redwood City, California. We primarily operate in the United States, where we maintain additional offices in Virginia, New York, Illinois, Texas, and

Georgia. As part of our global operations, we maintain international offices in Australia, France, Germany, Italy, the Netherlands, Singapore, the UK, India, and Mexico.

We pride ourselves on our people and they are our strongest asset. In 2017, we won the Glassdoor Best Place to Work award and we were named a Battery Ventures/Glassdoor Highest-Rated Cloud Companies to Work for in 2021. As of October 2022, we have a rich human capital of 853 full-time employees, with 707 based in the United States and 146 in our international locations.

Supply chain

Out of the approximately 300 vendors that the C3 AI Group uses, around 85 percent are located in the United States, with the other 15 percent located outside of the United States in various jurisdictions worldwide. Our vendors predominantly provide professional services, software and IT services and office supplies.

The C3 AI Group is dedicated to identifying, assessing and mitigating modern slavery related risks. Whilst we continue to expand our operations outside of the United States, we confirm that we do not work in, nor do we work with, any suppliers or contractors working out of the countries considered to have the highest risk for modern slavery.

Policies

C3.AI is dedicated to conducting its affairs honestly and ethically. Our reputation is dependent upon the integrity of our people and those associated with our business. Conduct that is dishonest, unethical, illegal or unsafe is not tolerated at C3.AI. Our Employee Handbook, which is circulated to all employees and updated regularly, as well as our Code of Business Conduct and Ethics, describes the behavior that we expect our people to follow.

We have a number of other policies which outline the standards of behavior that we expect and the avenues of escalation available to our people. These include our:

Anti-Corruption Policy - this global policy applies to all persons associated with C3.AI, including any third-party representatives, and is applicable to all C3.AI operations worldwide. C3.AI strictly prohibits all forms of corruption and bribery, meaning we will take all necessary steps to comply with applicable provisions under UK and comparative international anti-bribery and anti-corruption laws. Reports of potential violations require immediate notification to management and the Legal Department, and we hold mandatory anti-corruption training for all employees.

Whistleblower Policy - as a business, C3.AI takes any complaints or reports of concerns very seriously. Our compliance framework is in place to provide a workplace environment free of any harassment, discrimination or retaliation. The Whistleblower Policy provides a step-by-step guide for employees to submit their concerns confidentially and anonymously. These can be raised through our hotline, by email or through an online submission form. Non-employee stakeholders are also able to submit concerns or complaints by post or by email.

Code of Business Conduct and Ethics - there is an expectation that every employee, officer and director will act with integrity, apply good judgement and observe the highest personal ethical standards in making business decisions. C3.AI encourages its people to look out for, and where necessary, report, possible or actual violations. The highest standards of honest and ethical conduct are promoted, and we look to ensure that each employee operates within relevant legal guidelines and in adherence to domestic and foreign laws. Our integrity, including our financial integrity, is central to what we do.

Supplier Code of Conduct - promoting strong corporate integrity and ethical behavior is key to our business. The Supplier Code of Conduct describes our expectations of our suppliers which they are required to understand and adhere to. Specifically, we stipulate that C3.AI suppliers must follow all applicable laws and regulations relating to:

- anti-corruption laws (including the UK's Bribery Act);
- child labor;
- environmental protection and compliance; and
- health and safety.

We prohibit any form of human trafficking or involuntary labor through threat, force, fraudulent claims or other coercion. C3.AI will never knowingly use any forced labor or involuntary prison labor.

We expect our suppliers to provide a work environment that is safe, healthy and free of unlawful discrimination. Workers must:

- be treated with respect and dignity;
- be compensated fairly;
- work fair hours (including overtime); and
- be free to voice concerns and grievances.

The Supplier Code of Conduct requires our suppliers to have process and management systems in place to communicate and track any obligations with this code and applicable laws

and it is an expectation that suppliers conduct annual code of conduct training for those employees with whom we work.

Suppliers are provided with an email address to report any violations of our code and we state that any worker of the supplier who reports a violation in good faith must not be subject to any retaliation or disciplinary action. Failing to meet the standards could lead to the immediate termination of our business relationship.

Risk Assessment & Due Diligence

To ensure a high level of understanding of the modern slavery risks in our business and our supply chains, C3.AI's suppliers and contracting third parties agree to meet the minimum standards as set out in our Supplier Code of Conduct.

Our internal reporting lines, as outlined in our Whistleblower Policy, help us to identify new or advanced areas of risk within the business and our supply chain; in response to which we heighten our due diligence on the issue and area of concern. With all reports and matters of human welfare we strive to conduct ourselves according to the highest standards of ethical conduct and to comply with all applicable laws.

In terms of how we are assisting the wider promotion of strong environmental, social and governance issues, in September 2022, the C3 AI Group introduced 'C3 AI ESG'. This is an AI software application which enables companies to monitor, report and improve their ESG (environmental, social, and governance) performance. C3 AI ESG allows customers to streamline the process of gathering and validating ESG data across the organization, prioritizing and mapping data to widely used ESG reporting standards, and identifying and tracking progress across performance-improving initiatives for priority ESG issues. The C3 AI Group allows companies to harness the use of advanced AI to understand their ESG status and meet their goals more efficiently.

Training about Modern Slavery

We require all C3.AI employees to undertake mandatory annual training relating to our Code of Business Conduct & Ethics, insider trading, harassment and anti-bribery. All training is conducted and monitored through our training portal. The policies and procedures governing these topics are outlined in our Employee Handbook, which all C3.AI employees have access to and are required to read.

As this is our first Statement, we will ensure that C3.AI employees are made aware of the commitments set out in the Statement and the requisite expectations of them. We also plan to refer to the Statement in a revised version of our Employee Handbook.

Goals and Key Performance Indicators

We are pleased to report that the C3.AI has not had any instances or reports of modern slavery being identified or suspected in our business, or our supply chain.

We will continue to monitor our business and supply chain and report on any complaints raised internally or externally.

Looking Ahead

We are committed to improving our understanding and management of modern slavery risks in both our business and our supply chain. To extend our commitments to combating modern slavery over the next 12 months, C3.AI intends to take the following steps:

- Undertake a modern slavery and human trafficking risk assessment across the business to identify both our inherent and residual risk profile and to create a prioritization plan for action as part of our ESG initiative;
- Prepare and incorporate suitable anti-modern slavery and human rights clauses into third-party contracts where applicable;
- Maintain clear and open lines of communication between our employees and management on C3.AI's obligations under the Act and its commitments to meeting these;
- Appoint a designated person(s) within C3.AI who is responsible for overseeing modern slavery responsibilities and commitments and who can lead our plan for improving our modern slavery compliance framework; and
- Look to including modern slavery and human trafficking awareness modules into our mandatory training program.

Approval

This statement is made pursuant to, and for the purposes of, Section 54(1) of the Modern Slavery Act 2015 and has been formally approved by Derron J. Blakely, on January 10, 2023 as approved by the Board of Directors of C3.ai, Inc.

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Derron J. Blakely

General Counsel

Published by

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