



UK Modern Slavery and Human Trafficking Statement

We, Xactlians, are committed to improving our practices to combat slavery and human trafficking on our supply chains and in our business.

Xactly's Organisation's Structure And Business

For the purpose of this statement, any reference to "Xactly" is a reference to each and every company within the Xactly group of company, as we uphold the values set out in this statement, regardless of the geographical location of our entities.

Xactly is a SaaS vendor and provides enterprise platform for planning and incenting sales organizations, including sales quota and territory planning, incentive compensation management, and predictive analytics.

Our Policies On Modern Slavery And Human Trafficking

Xactly's Code of Conduct

Xactly strives to comply with all applicable laws and regulations, and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct, which applies across the Xactly group, reflects our commitment to acting ethically and with integrity in all our business relationships [and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains]. All employees, independent contractors and consultants, officers and board members of Xactly, must abide by this Code of Conduct. Our Code of Conduct, [in force during the last financial year], requires, among other things, that our officers and employees must comply with all applicable laws and regulations when acting on behalf of Xactly.

By empowering our employees with mechanisms to enforce our values (e.g., Xactly's whistle-blower reporting option or hotline number), Xactly's employees are well-positioned to help fight human trafficking in our business and supply chains.

Our Supply Chains

Xactly does not "manufacture" in the traditional sense with the use of factories and consequently our "suppliers" are mainly service providers (e.g., data centers that host our solution; other SaaS vendors; marketing companies and professional service companies (e.g., law firms, payroll providers and accountants).

Our supplier agreement includes a warranty that the parties need to comply with applicable laws (including Modern Slavery Act). Should Xactly become aware of any issues related to slavery or human trafficking, we will consult with our legal team to ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with any supplier conducting its business in such a manner.

Xactly's Modern Slavery Risks and Steps Taken to Address Those Risks

We consider our modern slavery risk to be generally low, particularly because of the sector in which we operate (SaaS/tech), the nature of our supply chains, and the values, policies and the Code of Conduct which our employees, contractors, consultants, officers and board members are required to adhere to. However, we are not complacent and to the extent that a risk of modern slavery, or a potential modern slavery incident is identified



within our business or supply chain, we would investigate and deal with that incident in accordance with our Code of Conduct, our agreement with the supplier and/or the law.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the 2020 financial year.

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Leanne Bernhardt
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Leanne Bernhardt

Chief Human Resources Officer

XACTLY CORPORATION