

Palantir Human Rights Policy

PURPOSE

Palantir Technologies Inc., along with our subsidiaries (collectively, "Palantir"), have been committed to defending human rights since our founding in 2003. We have affirmed the right of all people to protection under the Universal Declaration of Human Rights (UDHR) through our work over the last twenty years, and in this document we seek to share our founding commitment to respect privacy, civil liberties, and other fundamental rights wherever we work.

This policy applies to Palantir's global business operations. Specifically, the commitments contained in this policy apply to all Palantir officers, directors, employees, contractors, and consultants.

Palantir recognizes the role we play in helping some of the world's most important public, private, and non-profit institutions. We were founded with the goal to enable Western democracies and open societies to harness data in better protecting their citizens *without* compromising the civil liberties of the people they seek to protect. Our business has grown dramatically over the years and our customer base now includes commercial, governmental, and non-profit entities across defense, intelligence, healthcare, and other industries. Along with that growth, our core commitment to privacy and civil liberties [1] — cornerstones of human rights — remains as central to our identity as ever. Human rights due diligence for Palantir customers and suppliers are also addressed in the Partner Expectations section of this policy.

PALANTIR'S HUMAN RIGHTS POLICY

Palantir acknowledges its corporate responsibility to endeavor to protect human rights and supports the principles outlined in the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights (the "UDHR"), the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the human rights guidance set forth in the OECD Guidelines for Multinational Enterprises.

As most relevant to Palantir's business, we particularly support the global fundamental rights to security (UDHR Article 3), privacy (UDHR Article 12), and entitlement to rights and freedoms without distinction (UDHR Article 2), and we embrace our responsibility to uphold these values in our work. These rights have been essential to our mission since the company was founded — driving our focus on privacy and civil liberties, and security [2] as core values of our business and products.

Modern slavery is a crime and a violation of human rights, and we believe it is essential to our mission to assist in the eradication of slavery in the modern era. At Palantir, we are committed to adopting policies and practices that aim to eliminate any slavery or human trafficking in our supply chains or in any part of our business. Though we believe the direct risks of slavery and human trafficking practices within our business are very low, our Modern Slavery Statement [3] details the ways in which we take measures to enable our business and supply chain to be slavery free and review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Palantir supports the right of access to remedy for those impacted by adverse human rights actions. We are committed to striving to mitigate the risk of misuse of our products through a number of means, as detailed in the Partner Expectations section of this policy.

We pride ourselves on an internal culture in which concerns and questions are encouraged and voiced openly by all levels of employees. Palantir's policies, including our Code of Conduct [4], lay out methods by which Palantir employees, contractors and consultants can voice questions on ethical or legal conduct, either directly or anonymously. Retaliatory actions against anyone who in good faith voices concerns over possible violations are strictly prohibited.

Palantir will continue to engage with the international community on human rights thought leadership. This has been a longstanding pillar of Palantir, ranging from our historic engagement on data protection, privacy and civil liberties in technology to contributions on the thoughtful development of Artificial Intelligence. We will seek out specific avenues of external

engagement on human rights issues to share our expertise and learn from other companies, individuals, and organizations.

PALANTIR'S MISSION AND VALUES

Palantir partners with some of the most important governments, public institutions, non-profits, and commercial entities around the world in solving highly nuanced institutional challenges. The nature of our work, combined with our commitments to the security and confidentiality of our customers, imposes formal and legal limits on our capacity to explain specific details of our work, especially in relation to complex topics. We recognize that in helping our customers address crucial data-dependent challenges related to defense, healthcare, and other sensitive themes, there will naturally be concern over the appropriate use of data to achieve positive outcomes.

At Palantir, we believe that working to protect fundamental human rights requires engagement, including engagement with the institutions whose vital tasks exist in tension with certain human rights. Just as we best protect privacy and civil liberties by responsibly enabling the essential missions of security, defense, and intelligence, we believe we best uphold our commitment to secure human rights by enabling and supporting properly functioning global institutions. We believe that as a responsible corporate citizen, we must not only assess our work for any potential negative human rights impact, but also work to promote the positive role that our software can play in protecting vulnerable populations and in promoting the functioning of legitimate institutions around the world.

Additionally, we recognize the complexity of human rights and the potential for certain rights to exist in tension with each other in the spaces where Palantir more regularly operates. We recognize the nuance involved in certain areas we work in where core human rights tenets such as security and privacy have the potential to conflict with each other. By embracing this nuance we ensure that these type of tensions do not become mutually exclusive, and we allow for institutions to further their difficult but important missions. Even in doing so, we will continue to incorporate privacy and civil liberties as fundamental components of our products and approach.

INCORPORATION OF HUMAN RIGHTS INTO PALANTIR'S BUSINESS

Organizationally, human rights due diligence is part of Palantir's internal structure in the form of the Privacy and Civil Liberties (PCL) team, among others. Comprised of lawyers, engineers and social scientists, the team focuses on proactively incorporating privacy, ethics, and human rights principles directly into the products we offer and into the opportunities Palantir pursues, as well as fostering a culture of responsibility around the development and use of Palantir's products. This company approach directly maps to human rights and civil liberties principles through the promotion of "privacy by design," system accountability, and oversight where our products are deployed. Additionally, Palantir believes that any decision which could significantly affect individuals' rights to freedom, opportunity, and well-being should not be left solely to machines, and that the starting point of understanding potential effects on fundamental rights in the use of technology should involve a careful examination of whether the technology is appropriate or necessary for the problem at hand in the first place.

Palantir also incorporates human rights into our business through advisory consultations with the Palantir Council of Advisors on Privacy and Civil Liberties (PCAP) [5], a group of independent, international experts in privacy law, civil liberties in tech, policy, and ethics who help us understand and address the complex issues we encounter in the course of our work.

Finally, Palantir furthers the field of human rights through our commercial partnerships with humanitarian organizations. Our products are deployed on the ground by the likes of Polaris, C4ADS, and other non-profit organizations whose dedicated missions focus on preserving and improving rights to safety, freedom from hunger and slavery, and other core values of the UDHR.

PARTNER EXPECTATIONS

Palantir is not a data company [6], data broker, or data aggregator - we are a software company that builds data management, analysis, and operationalization infrastructure for our customers. Importantly, this means that our customers are the legal owners of their data. With the exception of information related to personnel management and other necessary internal business practices, Palantir does not own, collect, store, or sell personal data. We help our customers, many of them major public institutions, advance their mission objectives by leveraging our software. As noted in the UN Guiding Principles on Business and Human Rights (the “UNGP”) [7], this introduces complexity into the human rights related actions of our customers. Palantir actively considers the factors named in the UNGPs, and the potential for these factors to arise, in our customer relationships.

We expect all our customers to respect human rights while recognizing that they are themselves entities with rights and that they often operate in highly complex spheres.

Additionally, there are legal, ethical and privacy limitations around our ability to actively monitor all customer actions or leverage data they legally own, within Palantir products. We believe the best defenses against customers and third parties using Palantir products for outcomes with adverse human rights impacts are to incorporate privacy and security as building blocks of our products and proactively vet risk ahead of engagement. Unless specifically stated otherwise, the commitments in this policy do not extend to suppliers or other third parties, and also do not extend to our customers given our limited role in supporting their use of our software, among other factors. For more on our expectations of suppliers, please see our Supplier Code of Conduct [8].

With this in mind, we approach mitigating risk in our customers via four distinct means:

1. Incorporating privacy-by-design into Palantir products

- a. Security and privacy are core product considerations in everything we build, as evidenced by our global security accreditations [9] and thought leadership on privacy protective technologies. To this end, we create product features that continually remind customer users of their obligations to the ultimate end data subjects, as well as workflows that maximize transparency and auditability for customer data protection officers.

2. Proactive risk scoping of customers before work begins

- a. We believe the best risk defense for adverse human rights impacts among our customer base is a firm understanding of the customers with whom we work. We have specific criteria for industries we will work in, countries where we will not operate, and limitations on the capabilities we will build in certain situations. We have walked away from opportunities in the past where we were not comfortable with the work being done.

3. Thoughtful review of new product use cases

- a. Privacy, ethics, and civil liberty engineering is a core responsibility of all Palantir employees. All employees are trained on privacy, security, and ethical obligations for Palantir during general onboarding, as well given more granular training for any specific customer engagements. This includes concepts such as data minimization in practice, privacy by design, respect of customer data ownership, ethical boundaries to our work, and other important themes. Mandatory security, privacy, and compliance trainings are required to be completed by all employees on an annual basis. These values are essential to daily life at Palantir, and we take this expectation seriously and examine the risks and potential impacts of new product use cases with existing customers. This is notably different from many big tech companies, where products are rolled out first and the adverse impacts are determined after, resulting in a messier and less effective mitigation process.

4. Reactively addressing concerns around third party use of Palantir products

- a. Palantir strongly identifies an ever-present responsibility to strive to ensure that our software is used for good. We expect third parties, including customers, to respect human rights in their use of our products. Where we are made aware of claims of misuse of Palantir products, we will explore using every means at our disposal, including but not limited to contract provisions, collaboration with third-party oversight organizations, full cooperation with investigatory and judicial bodies, and termination of customer relationships.

Palantir's open internal culture has always encouraged all employees to proactively voice any concerns over any ethics or fundamental rights concerns related to any aspect of our business, including impacts by our customers, without fear of retribution.

HOW TO RAISE CONCERNS

Palantir has embraced, as a core value of the company since its founding, an open internal culture and ability to directly voice all questions, concerns or challenges around our work. As the right to remedy is a pillar of human rights due diligence, our **Company Code of Conduct** details the ways in which Palantir officers, directors, employees, contractors, and consultants are encouraged to voice questions on ethical or legal conduct in company operations. Palantir strictly prohibits retaliatory action against anyone who, in good faith, reports a potential code violation or who assists in an investigation of a possible violation.

Specifically, our officers, directors, employees, contractors, and consultants can raise complaints internally via the following means and assurances:

- Using our confidential ethics hotline or in direct communication with Palantir's Legal, Compliance, Privacy and Civil Liberties, Data Protection and People teams.
- Anonymously via the Palantir Whistleblower Hotline, hosted by a third-party provider.

As an external, impacted party you can report human rights concerns via HumanRights@palantir.com.

Palantir commits to reviewing the validity of human rights concerns and, where appropriate, taking subsequent action to mitigate adverse human rights impacts.

SUPPORTING RESOURCES

Palantir's global human rights policy is informed by our 20+ years of experience in complex problem solving around the world. It is based on international human rights laws and guiding principles as defined by the United Nations and other recognized institutions. We have developed our policy and due diligence processes with learnings from the following (non-exhaustive) human rights frameworks:

- [UN Guiding Principles on Business and Human Rights](#)
- [The United Declaration of Human Rights](#)
- [International Covenant on Civil + Political Rights](#)
- [International Covenant on Economic, Social + Cultural Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)

To learn more about Palantir's work on privacy, ethics and civil liberties as well as the thoughtful development of artificial intelligence, among other themes, please see the following resources:

- [Palantir's approach to PCL engineering](#)
- [Palantir's approach to AI ethics](#)
- [Palantir's AI policy contributions](#)
- [PCL thought leadership](#)
- [Palantir's privacy advisory board](#)
- [Palantir's Modern Slavery Statement](#)
- [Palantir's Company Code of Conduct](#)

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- [1] Palantir's Privacy and Civil Liberties Team <https://www.palantir.com/pcl/>
- [2] Palantir's Privacy and Security Statement <https://www.palantir.com/privacy-and-security/>
- [3] Palantir's Modern Slavery Statement <https://www.palantir.com/modern-slavery-statement/>
- [4] Palantir's Company Code of Conduct [https://investors.palantir.com/files/Palantir%20Code%20of%20Conduct%20\(2023\).pdf](https://investors.palantir.com/files/Palantir%20Code%20of%20Conduct%20(2023).pdf)
- [5] Palantir's Council of Advisors on Privacy and Civil Liberties (PCAP) <https://www.palantir.com/pcl/advisors/>
- [6] Palantir is Not a Data Company, 2020. <https://blog.palantir.com/palantir-is-not-a-data-company-palantir-explained-1-a6fcf8b3e4cb>
- [7] UN Guiding Principles on Human Rights
https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
- [8] Palantir Supplier Code of Conduct <https://www.palantir.com/supplier-code-of-conduct/>
- [9] Palantir Security Accreditations <https://www.palantir.com/information-security/>