



Code of Conduct and Ethics

We do the right thing.

We follow the law.

We have a shared understanding of our corporate values:
Customer Obsession, Trust, Teamwork, and Accountability.

AUGUST 2026

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Sprinklrites,

Our vision—to redefine the world’s ability to make every customer experience extraordinary—sets the north star for us to lead. But achieving it requires trust. “Do what you say and own what you do” is the spirit by which we operate. This Code of Conduct and Ethics (“Code”) is our shared commitment to doing the right thing with trust and accountability—always. It sets the expectations for every Sprinklr employee, and anyone working on our behalf to lead with integrity, deliver with accountability, and uphold the values that power long-term success for our customers, partners, stockholders, and each other.

This Code aligns with our cultural values – customer obsession, trust, teamwork, and accountability. Every action and decision is an opportunity to live in accordance with our cultural values, and this Code is a guide for how we conduct ourselves in an ethical way inside and outside of Sprinklr. Our commitment to this Code helps to ensure that we hire great teammates, nurture and protect our culture and reputation, build amazing products, and support our mission to empower companies to deliver next generation, unified engagement journeys that reimagine the customer experience.

Often, your best resource for matters related to this Code is your manager, but you should also feel free to discuss your questions and concerns with the Culture & Talent team (CTOps@sprinklr.com), the Legal team (legal@sprinklr.com), or directly with our Chief Compliance Officer (compliance@sprinklr.com). Sprinklr maintains an Ethics Hotline that you may contact anonymously. The last page of this Code provides you with contacts for questions and additional details on reporting concerns and violations.

Do not hesitate to ask questions, voice concerns, or seek clarity about whether certain conduct may violate this Code. Any violation or possible violation of this Code or Sprinklr’s governance should be reported promptly without fear of retaliation. Any employee who violates this Code may be subject to disciplinary action, which, depending on the circumstances, can range from a warning to termination of employment and, in the most serious cases, civil legal action or referral for criminal prosecution.

Our AI-native unified customer experience platform is emerging as a game-changing path forward. Thank you for everything that you do for Sprinklr and your commitment to our Code as we innovate and accelerate, together.



Rory Read
& Board of Directors

Our Vision & Mission: Living by our Values - The Sprinklr Way

SPRINKLR VALUES



**Customer
Obsession**



Accountability



Teamwork



Trust

The Sprinklr Way - our core values of **Customer Obsession, Accountability, Teamwork, and Trust** - shape how we work together, serve our customers, and make ethical decisions.

In practice, living by these values means taking ownership of our commitments, working as one team, speaking honestly, listening openly, welcoming diverse perspectives, and using sound judgment to strengthen trust with our customers and colleagues.

Our vision and mission describe where we are going and why our work matters.

This Code helps us apply those principles in our day-to-day practices.



VISION

Redefine the world's ability to make every customer experience extraordinary



MISSION

Empower companies to deliver next generation, unified engagement journeys that reimagine the customer experience.

Before taking action, always ask yourself:

- Is it legal?
- Does it align with this Code, our governance, and our values?
- Would I be comfortable if others knew about this?

If the answer to any of these questions is unclear or no, do not proceed until you have asked questions and sought guidance through one of the reporting channels listed at the end of this Code.



Scope and Applicability

This Code applies to all employees, officers, board members, and anyone working on behalf of Sprinklr, Inc. and any of our controlled entities, including our subsidiaries. Every employee, officer, director, and third party acting for or on behalf of Sprinklr, such as partners, contractors, agents, and/or other third-party agents (collectively, “Sprinklrites”), must read, understand, and follow this Code.

Vendors and suppliers of Sprinklr’s are required to comply with Sprinklr’s [Supplier Code of Conduct](#) and/or their own internal policies that align in all material respects with Sprinklr’s Supplier Code.

While this Code covers many subjects, it is not intended to provide comprehensive answers to every situation one may encounter. In addition to adhering to Sprinklr’s internal policies, standards, procedures, and guidelines (collectively, “Sprinklr’s Governance”), which are consistent with this Code and provide further detail and guidance on the topics covered below, Sprinklrites should also apply good judgment and the highest personal and ethical standards in making business decisions. All Sprinklrites are trained on the Code and Sprinklr’s Governance upon hire and annually thereafter, and lack of awareness of the Code or any other component of Sprinklr’s Governance does not exempt anyone from their responsibilities or excuse misconduct. In addition, Sprinklrites cannot have others, including, but not limited to, friends or family, act on their behalf to indirectly violate this Code.

Leaders and Managers

If you are in a leadership or management position at Sprinklr, you are expected to meet additional responsibilities:

- **Lead by Example and Empower Others:** Serve as a role model for ethical leadership and appropriate conduct and educate your teams on their obligations under this Code. Ensure you and your team timely complete training on the topics covered in this Code and Sprinklr Governance.
- **Prioritize Transparency and Accountability:** Create, maintain, and foster an environment where everyone feels comfortable speaking up, and be supportive and responsive to employees who come to you with questions and concerns.
- **Escalate Questions:** Know when and how a question or concern should be reported to Sprinklr’s Culture & Talent Team, Legal Team, or the Chief Compliance Officer.
- **Report Concerns:** Report any violations of this Code or Sprinklr’s Governance promptly and help ensure that no one who speaks up or participates in an investigation experiences retaliation for doing so.

Compliance with Laws

Sprinklr is a global company committed to following applicable laws and regulations wherever we do business. Our success as a company depends upon each Sprinklr employee operating within the ethical and legal standards that govern our business conduct. As such, all Sprinklr employees are expected to comply with this Code, Sprinklr’s Governance, and all local, national, and international laws, rules, and regulations that govern our business around the world.

While we do not expect all Sprinklr employees to memorize every detail of these laws, everyone is expected to be familiar with the legal and regulatory obligations that are relevant and applicable to your business units and areas of responsibility, which are outlined in this Code and in Sprinklr’s Governance. We also expect all Sprinklr employees to spot issues and ask for advice from Sprinklr’s Legal Team, Culture & Talent Team, leaders, or other subject matter experts as needed.

If you ever have a question regarding legal compliance or whether what you are being asked to do complies with the law, do not hesitate to ask your manager, Sprinklr’s Legal Team, or Sprinklr’s Chief Compliance Officer for help. Violation of applicable laws, rules, and regulations has serious consequences and may subject an individual, as well as Sprinklr, to civil and/or criminal penalties.

Some of the laws that pertain to Sprinklr’s business include:

Insider Trading Laws

Employees, officers, and directors who have access to confidential (or “inside”) information are not permitted to use or share that information for stock trading purposes. All non-public information about Sprinklr or about other companies is considered confidential information. Use of any material, non-public information in connection with buying or selling securities, including “tipping” others who might make an investment decision on the basis of this information, is illegal. Please refer to Sprinklr’s Insider Trading Policy for more detailed information.

Data Privacy and Security Laws

Sprinklr takes the privacy and security of our customers, partners, and employees seriously and is committed to ensuring that our products and services protect the data our customers and investors expect us to secure, and which the law requires us to protect. We build our products the right way, incorporating privacy and security by design, and we are transparent about and accountable for our data collection practices in our privacy notices. Sprinklr maintains a Data Privacy Policy and a Security Policy, numerous standards that govern the privacy and security of data, and supplemental resources on what Sprinklr employees can and cannot do with data. Familiarize yourself with them. Innovate, but prioritize information security in all that you do. Never sacrifice the security of our services, systems, or platform. For more information on Sprinklr’s data privacy and security programs, please refer to our [Trust Center](#).

Laws Regarding Responsible AI

Artificial Intelligence (“AI”) is the foundation of Sprinklr’s Unified Customer Experience Management Platform and continues to transform how we and our customers work. The AI capabilities we make available to our customers enhance the digital experience while streamlining and improving their customer engagement and interaction. As the AI capabilities grow, so does our responsibility, and we believe that trust, transparency, and ethical design are essential to unlocking the full potential of AI. Sprinklr is committed to developing and deploying AI technologies in a way that is consistent with our AI principles, internal Generative AI Standard, our company mission and values, and our commitment to comply with all applicable laws and regulations regarding the responsible development, deployment, and use of AI. For more information on Sprinklr’s AI principles, please refer to our annual [ESG Report](#).

International Business Laws

Our employees, officers, and directors are expected to comply with applicable laws in all countries to which they travel, in which they operate, and where we otherwise do business, including laws prohibiting bribery, corruption, or business relationships with specified individuals, companies, or countries. The fact that some countries do not enforce such laws, or do not subject violation of those laws to public criticism, is not an excuse for non-compliance. The expectations in this Code and Sprinklr’s Governance, such as the Anti-Corruption Policy, apply globally and consistently.

In addition, we expect you to comply with U.S. laws, rules, and regulations governing business conduct by its citizens and corporations outside the U.S. These U.S. laws, rules, and regulations, which extend to all our activities outside the U.S., include, but are not limited to:

- **The Foreign Corrupt Practices Act (FCPA)**, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment. The FCPA also requires the maintenance of accurate books and records, with all company transactions being properly recorded.
- **Trade Sanctions and Embargoes**, which generally prohibit engaging in transactions or dealings involving certain countries and territories subject to embargoes imposed by the U.S. government, as well as specific entities and individuals identified on sanctions lists published by the U.S. Department of the Treasury’s Office of Foreign Assets Control.
- **Export Controls**, which restrict exports from the U.S. and re-exports from other countries of goods, software, and technology to many countries and prohibit transfers of U.S.-origin items to denied persons and entities.
- **Antiboycott Regulations**, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

If you have a question as to whether an activity is restricted or prohibited under international business laws, seek assistance from your manager, Sprinklr’s Legal Team, or the Chief Compliance Officer before taking any action, including giving any verbal assurances that might be regulated by international laws.

Antitrust Laws, Fair Competition Laws, and Fair Dealings

At Sprinklr, we are customer obsessed, and we are confident that customers will choose us because of our exceptional products, our hyperfocus on value, and our mission of empowering companies to reimagine the customer experience. Because of this, we follow applicable anti-trust and fair competition laws. These laws are designed to protect the competitive process and impose severe penalties, up to and including criminal penalties, for certain types of violations, such as illegal agreements or collusion among competitors.

You are also expected to deal fairly with our customers, suppliers, employees, and anyone else with whom you have contact while performing your job. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Certain kinds of information, such as Sprinklr’s strategies, business plans, budgets, forecasts, financial and operating information, pricing, production, and inventory, should never be exchanged with competitors, regardless of how innocent or casual the exchange may be. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from employees of other companies is also prohibited. If information that may be a trade secret or that may be considered information of another business is obtained by mistake, or if you have any questions about the legality of proposed information gathering, you must consult with your manager, Sprinklr’s Legal Team, or the Chief Compliance Officer.

Finally, employees 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.



Honest and Ethical Conduct

Sprinklr's reputation depends on every Sprinklr's commitment to doing the right thing with trust and accountability. The highest standards of personal integrity and sound judgment are the foundation of this Code, Sprinklr Governance, and our cultural values.

Acting with honesty and fairness is also paramount to earning and maintaining the trust of our customers. Delivering on our mission to empower companies to deliver next generation, unified engagement journeys that reimagine the customer experience requires that we maintain the integrity of our business operations, the safety and security of the data that we are entrusted to process, and the relationships that we have built with our customers and partners.

Accountability

All Sprinklr's are held to the same standards, regardless of their tenure or role, and are expected to take ownership of their work and deliver on their commitments to our customers, each other, and Sprinklr. Through honest and ethical conduct, including being accountable for and learning from mistakes, individuals and teams earn and maintain trust and respect. Being accountable also means speaking up and reporting conduct that does not align with this Code or Sprinklr's Governance. You should report possible violations promptly without fear of retaliation to your manager or the Chief Compliance Officer.

Conflicts of Interest and Corporate Opportunities

We expect our employees, officers, and directors to be free from influences that conflict with the best interests of Sprinklr. If our customers, partners, or others think that our business judgment is affected by personal motivations, we lose trust and hurt Sprinklr's reputation, as even the appearance of a conflict of interest can be damaging and should be avoided.

The following are some examples of situations that might involve a potential conflict of interest:

- Employment by, consulting for, or service on the board of a competitor, customer, or supplier;
- Owning a significant financial interest in an entity that does business, seeks to do business, or competes with Sprinklr;
- Soliciting or accepting gifts, favors, loans, or preferential treatment from any person or entity that does business or seeks to do business with Sprinklr; and
- Loans to, or guarantees of obligations of, employees, officers, directors, or their family members by Sprinklr.

You also may not use your position at Sprinklr or Sprinklr’s corporate property or information for improper personal gain, nor should you compete with Sprinklr in any way. Even opportunities that are acquired privately by you may be questionable if they are related to Sprinklr’s existing or proposed lines of business. You may not take personal advantage of opportunities for Sprinklr that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information.

If you have any questions about a potential conflict or corporate opportunity, you should seek approval from the Chief Compliance Officer before engaging in the activity. Managers may not authorize or make determinations about conflict of interest matters without first providing the Chief Compliance Officer with a written description of the activity and seeking their approval. Officers and directors may seek authorizations and determinations from the Nominating and Corporate Governance Committee (the “Nominating Committee”) of the Company’s Board of Directors (the “Board”), or such other committee of the Board that the Board may expressly designate.

Any other questions about conflicts of interest, reports of any actual or potential conflicts, or corporate opportunities should be promptly sent to the Chief Compliance Officer.

Maintenance of Corporate Records, Financial Integrity, and Public Reporting

Sprinklr’s corporate and business records should be completed accurately and honestly. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, partners, suppliers, creditors, employees, and others with whom we do business. It is therefore essential that Sprinklr’s books, records, and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs, and expenses, as well as all transactions and changes in assets and liabilities.

The integrity of Sprinklr’s records and public disclosure depends upon the validity, accuracy, and completeness of the information supporting the entries to our books of account. Making false or misleading entries, whether they relate to financial results or test results, is strictly prohibited. We further require that:

- No entry is made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities, or that misclassifies any transaction as to accounts or accounting periods;
- Transactions be supported by appropriate documentation;
- The terms of sales and other commercial transactions are reflected accurately in the documentation for those transactions, and that all such documentation be reflected accurately in our books and records;
- You comply with all Sprinklr systems of internal controls; and
- No cash or other asset is maintained for any purpose in any unrecorded or “off-the-books” fund.

Sprinklr’s accounting records are also relied upon to produce reports for our management, stockholders, and creditors, as well as for governmental agencies. Sprinklr relies upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the Securities and Exchange Commission (the “SEC”). Securities laws require that these reports provide full, fair, accurate, timely, and understandable disclosures that

fairly present our financial condition and results of operations. Employees who collect, provide, or analyze information for or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that Sprinklr’s financial disclosures are accurate and transparent and that our reports contain the information about Sprinklr that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures. In addition:

- No employee may take or authorize any action that would intentionally cause Sprinklr’s financial records or financial disclosures to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC, or other applicable laws, rules, and regulations.
- You must cooperate fully and promptly with Sprinklr’s Legal, Finance, and Internal Audit activities, as well as our independent public accountants. You must respond to their questions with candor and provide them with complete and accurate information.
- You must help ensure that Sprinklr’s books and records, as well as our reports filed with the SEC, are accurate and complete. No employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosures in any of our reports accurate in all material respects.

Obligations around the integrity and accuracy of Sprinklr’s books and records also extend to accurate sales forecasting, as well as the need for all Sprinklrites to maintain accurate and up-to-date information in any of Sprinklr’s information systems, tools, and systems of record that they manage and engage with.

Any employee who becomes aware of any departure from these standards must report their knowledge promptly to their manager, the Chief Compliance Officer, the Audit Committee of the Board, or otherwise in accordance with the provisions of Sprinklr’s Whistleblower Policy.

Company Assets

All employees, officers, and directors are expected to protect Sprinklr’s assets and help ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. Sprinklr’s property, office supplies, computer equipment, buildings, and products should only be used for legitimate business purposes and in accordance with Sprinklr’s Acceptable Use Standard.

In addition, Sprinklrites are required to protect Sprinklr’s intellectual property. You may not use Sprinklr’s corporate name, any brand name, or any other trademark owned or associated with Sprinklr or any letterhead stationery for any personal purpose. Any public use by third parties of Sprinklr’s trademarks should be cleared in advance by Sprinklr’s communication team (pr@sprinklr.com).

Confidentiality

As an employee, officer, or director of Sprinklr, you may learn information about Sprinklr or other companies that is confidential and proprietary to Sprinklr, or that is considered confidential third-party information. You must take care to keep this information confidential, and all Sprinklrites are bound by the confidentiality terms of their Employment Agreement, Proprietary Information and Inventions Agreement, or similar terms that they agree to in connection with their employment.

Depending on your role, you may also gain access to confidential customer information. You should treat this information the same way you would treat Sprinklr’s confidential information. All materials that contain confidential information should be stored securely in authorized locations, as outlined in Sprinklr’s Data Classification Standard and Acceptable Use Standard. Unauthorized posting or discussion of any confidential information concerning Sprinklr’s business, customers, or prospects is prohibited.

Be cautious when discussing such information in public places like elevators, airports, restaurants, and “semi-public” areas within Sprinklr. All of Sprinklr’s emails, voicemails, and other communications are presumed confidential and should not be forwarded outside of Sprinklr, except where required for legitimate business purposes.

Media and Public Disclosures of Information

It is Sprinklr’s policy to disclose material information concerning Sprinklr to the public only through specific limited channels to avoid inappropriate publicity and to help ensure that all those with an interest in the company will have equal access to information. All inquiries or calls from financial analysts should be referred to the Chief Financial Officer or the investor relations department (ir@sprinklr.com). All inquiries or calls from the press or other media outlets should be referred to Sprinklr’s communication team (pr@sprinklr.com). Please refer to Sprinklr’s Corporate Disclosure Policy and Corporate Communications and Social Media Policy for more details regarding public disclosures.



Gifts and Hospitality

Business gifts and hospitality are meant to create goodwill and sound working relationships. They should not be used to gain improper advantage with customers or facilitate approvals from government officials. Our customers, suppliers, and the public at large should know that our judgment is not for sale. Under some statutes, such as the FCPA, giving anything of value to a government official to obtain or retain business or favorable treatment may also be considered a criminal act subject to prosecution and conviction.

All gifts and hospitality that are offered, provided, received, or accepted should be reasonable and appropriate under the circumstances, consistent with customary business practices, and in compliance with applicable laws. Gifts and hospitality should also align with Sprinklr’s Governance, including our Anti-Corruption and Travel and Expense Policies. Gifts and hospitality are not permitted if they:

- Are cash or cash equivalents (for example, gift cards);
- Are susceptible of being construed as a bribe or kickback;
- Are made or received on a regular or frequent basis;
- May reasonably be deemed to affect your judgment or actions in the performance of your duties; or
- Violate any laws.

These requirements are globally applicable, even if the practice of gifting or hospitality is widely considered “a way of doing business.”

If you are uncertain about the appropriateness of any proposed gifts or hospitality, consult with your manager or the Chief Compliance Officer before engaging in the gifting or hospitality. Please refer to Sprinklr’s Anti-Corruption and Travel and Expense Policies for more details.

Respect, Equal Opportunity, and our Commitment to a Safe Workplace

At Sprinklr, we are focused on creating a positive, productive, and inclusive culture that engages and energizes Sprinklrites to deliver on our strategy and business commitments. We recognize the strength, innovation, and perspective that comes from celebrating individual differences, and all employees, officers, directors, and third parties must conduct themselves professionally and treat others with dignity and respect. Sprinklr is committed to providing a supportive work environment that is free of harassment, intimidation, or any other kind of unlawful discrimination. Sprinklr strictly prohibits unlawful discrimination or harassment on the basis of any characteristics protected by law. Employment at Sprinklr, as well as all decisions we make with respect to recruiting, hiring, performance evaluations, and terminations, are based upon individual merit and qualifications directly related to professional competence.

Sprinklr also has a responsibility to ensure that all employees and visitors can work and operate in a safe, violence-free environment. Sprinklr workspaces should be free from physical hazards and weapons, and instances of work-related violence, including verbal abuse or the threat of violence, will not be tolerated.

Instances of harassment, discrimination, or other similar concerns should be promptly reported to Sprinklr's Legal Team, Culture & Talent Team, the Chief Compliance Officer, or through Sprinklr's [Ethics Hotline](#). Please refer to Sprinklr's Global Harassment & Discrimination Policy for more details.



Responsibility for Environmental, Social and Governance Issues

Sprinklr recognizes its corporate responsibility to implement and support a high standard of ethical and environmental business practices. Sprinklr's Environmental, Social, and Governance (ESG) Program reflects our commitment to ethical, commercial, and environmentally conscious business practices and is focused on:

- **Reducing Environmental Impact:** Sprinklr is committed to improving environmental performance across our business activities, including seeking to improve the efficiency and resilience of our operations and promoting the efficient use of resources.
- **Safeguarding Human Rights and Employee Welfare:** Sprinklr's business practices prioritize safe working conditions and worker's rights, as outlined in Sprinklr's Global Health, Safety, and Environmental Policy. 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](#) and related regulations. We comply with applicable fair labor practices related to child labor, working hours, minimum wage, and collective bargaining rights.
- **Establishing Governance:** Sprinklr is focused on establishing governance that provides guidance to all business stakeholders on appropriate corporate processes, internal expectations, and reporting channels. All Sprinklrites are trained on Sprinklr's Governance upon hire and annually thereafter.

Additional information about Sprinklr's ESG program is available in Sprinklr's annual [ESG Report](#).



Questions, Administration, and Enforcement

Questions and Reporting Potential Violations

Often, your best resource for matters related to this Code is your manager, who may have the information you need or may be able to refer the question to another appropriate source. Alternatively, you can also discuss your concerns with the Culture & Talent Team (CTOps@sprinklr.com) or the Legal Team (legal@sprinklr.com).

We have designated our Chief Compliance Officer to oversee this program, and all governance created by Sprinklr's business units and operations. You can reach out to them at any time at compliance@sprinklr.com.

Sprinklr maintains an [Ethics Hotline](#), which you can reach by phone or by secure web form (both of which are included at the end of this Code). The Ethics Hotline is available to anyone who wishes to report violations of this Code, including concerns regarding our auditing and accounting matters. Reports to the Ethics Hotline may be made anonymously to the extent allowed by local law. For those who choose to remain anonymous, please know that it is important to provide as much detail as possible to allow for a prompt and thorough investigation. Any contact with the Ethics Hotline will be kept strictly confidential to the extent reasonably possible within the objectives of this Code and applicable law.

If you are aware of a suspected or actual violation of this Code, you have a responsibility to promptly report it. Upon receiving a report, the Chief Compliance Officer, in conjunction with any other individuals, teams, or resources deemed necessary, will appropriately assess all reports and investigate further where warranted. Code violation allegations are taken very seriously, and we will maintain confidentiality of our investigation to the extent reasonably possible considering Sprinklr's need to investigate reported matters and the requirements of applicable laws. See our Whistleblower Policy for more information about the reporting and investigations processes.

If any investigation indicates that a violation of this Code has occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee, officer, or director is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination and, in appropriate cases, civil action or referral for criminal prosecution. Sprinklr employees are not entitled to retain any compensation or other benefits that were obtained through or in connection with any violation of this Code or Sprinklr's Governance.



Nothing in this Code prohibits employees from communicating with government agencies about possible violations of federal, state, or local laws or otherwise providing information to government agencies, filing a complaint with government agencies, or participating in government agency investigations or proceedings, and this Code does not require employees to notify Sprinklr of any such circumstances.

Policy of Non-Retaliation

Sprinklr complies with all applicable laws that protect employees against unlawful discrimination or retaliation by us or our agents for lawfully reporting information in connection with an investigation. Sprinklr’s policy of non-retaliation also extends to any employees who may participate in or support the investigation of a reported matter, including through interviews or document collection.

If any employee believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination, or retaliation by Sprinklr or its agents for reporting complaints regarding compliance matters in accordance with this Code, he or she may file a complaint with the Chief Compliance Officer or Sprinklr’s Culture and Talent team. If it is determined that an employee has experienced any retaliation in violation of this Code, we will endeavor to promptly take appropriate corrective action.

Approved by the Board of Directors: August 20, 2026

Policy Owner: Board of Directors

Effective Date: August 20, 2026

Approving Authority: Board of Directors

Applicability: Sprinklr, Inc. and its subsidiaries and affiliates (collectively, “Sprinklr” or the “Company”)

Acknowledgment

All Sprinklrites must carefully review this Code and confirm that they have received, read, understand, and agree to comply with this Code upon hire and annually thereafter. Your following of this Code is an integral part of Sprinklr making ethical business decisions, building and retaining the best team, and serving our customers. Thank you for carefully reviewing this Code.

Waivers

Any waiver of this Code for executive officers or directors may be authorized only by the Board or, to the extent permitted by the rules of any stock exchange on which our capital stock is listed and our Corporate Governance Guidelines, a committee of the Board. Such waivers will be publicly disclosed as required by applicable laws, rules, and regulations.

Changes; Annual Review

From time to time, we may make additions or changes to this Code. Any changes to this Code may only be made by the Nominating Committee and will be recommended to the Board for approval and effective upon approval by the Board. The Nominating Committee will review and reassess the adequacy of this Code at least annually and recommend to the Board any changes the Nominating Committee determines are appropriate. All changes must be promptly disclosed as required by law or regulation.

Website Disclosure

This Code, as may be amended from time to time, shall be posted on Sprinklr’s website. Sprinklr shall state in the annual proxy statement that this Code is available on our website and provide the website address as required by law or regulation.



Questions or Concerns?

Reach out to:

Your manager

Culture & Talent: CTOps@Sprinklr.com

Our Chief Compliance Officer: compliance@sprinklr.com

Our Ethics Hotline by phone or secure webform: <https://www.lighthouse-services.com/sprinklr>

Our Ethics Hotline is operated by an independent provider and allows you to remain anonymous, where permitted by law.