



## **Figma's Modern Slavery Act Statement**

**Section 54(1)** of the United Kingdom **Modern Slavery Act 2015** requires certain businesses to publish a statement specifying the efforts taken to prevent slavery and human trafficking anywhere in their own business or their supply chain for each financial year of the organization (the "**Modern Slavery Statement**"). This communication constitutes the s.54 Statement of Figma, Inc. for the fiscal year ending December 31, 2022.

**Figma, Inc.** ("we", "us" or "our") is a Delaware corporation headquartered in San Francisco, California, with a presence in the UK and other markets around the world. In the UK, we operate via our wholly owned subsidiary, **Figma UK Ltd.** For the purposes of this statement, any reference to "we", "us" or "our" is a reference to Figma, Inc. and each of its subsidiaries, as we uphold the values set out in this statement, regardless of geographic location.

### **Zero Tolerance Policy to Modern Slavery & Human Trafficking**

We are committed to ensuring that our business operates in a socially responsible way that prevents slavery and human trafficking. We are also committed to playing our part in helping the world develop practices designed to combat slavery and human trafficking.

### **Our Business Operations:**

Figma provides a web-based product design software platform for product teams to design and build digital products, such as websites and applications, collaboratively ("**Figma Design**"). We also provide a digital whiteboarding tool known as FigJam ("**FigJam**"). Collectively, Figma Design and FigJam are referred to as the "**Figma Products**".

Our procurement team is based in the United States, and the suppliers supporting the Figma Products are headquartered in the United States. Outside of our Figma Products suppliers, we engage local suppliers in the other countries in which we operate, including but not limited to the UK, the European Economic Area (EEA), Singapore and Japan. Our key suppliers are typically in the fields of technology, data, office and facilities, and professional advisory services, staff leasing services, which are typically low-risk sectors. Figma additionally has an online merchandise store whereby clothing and other Figma branded items can be purchased by consumers. All the materials available for sales on the online store are manufactured by third parties and profits from these sales are donated to an environmental charity dedicated to reforestation and combatting the effects of climate change.

### **Risk Assessment:**

We only use reputable providers of goods and services. We do not tolerate slavery and human trafficking within our supply chain and if allegations or evidence of this occurs, we would immediately conduct an inquiry and take appropriate action (including seeking to terminate our relationship with the supplier and making a report to the relevant authorities where required). Where possible, we include obligations in our agreements with our suppliers regarding compliance with applicable modern slavery laws.

The majority of our suppliers and third-party business partners are large companies with established corporate social responsibility programs, including in relation to modern slavery. Based on the geography of our supply chain, the sectors in which we operate, and the structure of our business, which provides software-as-a service to individuals and organizations, there is a low risk of slavery and human trafficking taking place within our supply chain. However, we remain vigilant against the risk of human trafficking and any form of slavery and take steps to assess and manage that risk.

We are not aware of any allegations of human trafficking or slavery activities against any of our current suppliers.



## **Figma's Business Ethics Policies:**

We comply with all laws and regulations applicable to Figma and the provision of the Figma Products. We are committed to acting with integrity in all of our business activities, preventing any form of modern slavery in our business, and promoting practices which reflect our values, including:

- We have a Standards of Conduct as a Supplier, a policy applicable across our entire company, which provides that we support and respect internationally recognized human rights as expressed in the Universal Declaration of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and that we have a zero tolerance approach to modern slavery practices.
- We value diversity, promoting an inclusive environment, treating people with dignity and respect, and maintaining a respectful and safe workplace. We do not discriminate in employment or hiring and validate and review all relevant documentation to ensure all our employees have the legal right to work in each jurisdiction.
- We do not use, engage in, or encourage child labor. Child labor means labor that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development. Many countries have a minimum age for employment or work — Figma understands and respects those requirements.
- We expect that all our business partners and suppliers embrace our values, reflect them in their business and employment practices, and take reasonable steps to ensure those values are upheld consistently, including minimizing the risk of modern slavery.

We have adopted a broad set of policies and/or implemented employee training on the following topics:

1. Code of Conduct;
2. Anti-Harassment and Discrimination;
3. Anti-Bribery and Corruption;
4. Maintaining Welcoming, Safe, and Productive Workplace;
5. Staff Privacy and Data Protection;
6. Diversity, Equity, and Inclusion;
7. Compliance Reporting Policy; and a
8. Conflicts of interest.

Our policies require, among other things, that our employees not engage in any unlawful activity in conducting our business or in performing their day-to-day company duties.

## **Whistleblowing Hotline:**

Figma supports an inclusive, open, and tolerant workplace environment and encourages its personnel to raise modern slavery or human trafficking concerns or report poor practice within Figma and our suppliers. To enable this we maintain a third party operated whistleblowing hotline, which our employees can use to anonymously raise any modern slavery or human trafficking activity concerns.

## **Our Platform Content Policies:**

Our acceptable use policy ([www.figma.com/aup](http://www.figma.com/aup)), explains the types of content that are permitted and prohibited on our public platform called Figma Community. We prohibit the following content from our platform: illegal activities/goods or



promotion of illegal activities/goods, including content that involves modern forms of slavery and human trafficking; pornography or sexually explicit or obscene material; depictions of minors in a sexual manner; and graphic violence.

Figma continues to develop standards, processes, and procedures to monitor and review the effectiveness of our internal policies and their implementation. We also analyze and research all suppliers prior to onboarding to understand the nature of the supplier, the goods and services procured, and the risk a supplier may pose. Since our last published Modern Slavery Statement we have introduced the following measures to make our supplier risk assessment more robust:

- Over the course of 2022 and 2023 we have made significant investments in the expansion of our procurement team, including hiring professionals with considerable relevant experience and expanding our team globally. As a result of these investments, our procurement function operates as a standalone, centralized function operating out of our headquarters in San Francisco, California. The greater amount of resources we have invested means we can continue to introduce increasingly mature processes designed to make our procurement review more rigorous, transparent, and effective.
- We have implemented a dedicated Anti-Slavery Policy. This policy is specifically designed to raise awareness of modern slavery issues and provide clear guidance to our staff as to how to identify and address such practices. The policy also outlines which teams and individuals at Figma are responsible for its enforcement and application.

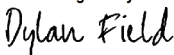
In 2023 and 2024, we will evaluate what further steps we can take as a business to ensure that Figma, our suppliers, and our partners continue to focus on preventing exposure to modern slavery practices.

This statement was approved by the Board of Directors of Figma, Inc. on November 7, 2022.

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**Dylan Field**  
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Signature:

  
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Title:

**CEO & Co-Founder, Figma, Inc.**  
**Director, Figma, Inc.**