

1 July 2024

Joint Committee of Public Accounts and Audit
Parliament House
Canberra ACT 2600

Dear Chair and Committee

Inquiry into procurement at Services Australia and the National Disability Insurance Agency

I refer to your subsequent Joint Committee of Public Accounts and Audit (JCPAA) questions to Salesforce in your correspondence dated 20th June 2024.

All Salesforce employees are required to comply with its Employee Code of Conduct and other policies, including those relating to offering gifts or hospitality to customers. Applicable Salesforce policies and procedures were not followed in relation to gifts and hospitality referred to in its March 2024 submission to the Committee. Salesforce takes any violation of its company policies seriously and is taking appropriate steps to address this matter. It is because of our commitment to trust and ethical business practices that we have voluntarily disclosed information to the JCPAA and the National Disability Insurance Agency (NDIA) to assist in their inquiries.

In response to the questions raised by the Committee in your letter, Salesforce has the following answers, based on information presently known.

- **Did Salesforce's Office of Global Ethics and Integrity approve every one of these payments in accordance with its own corporate policy?**

No. Only three of the items (numbers 45, 50 and 105 in Annexure E) were reviewed and approved by Salesforce's Office of Global Ethics & Integrity (GE&I). GE&I did not approve any of the other expenses in the Annexure. Applicable Salesforce policies and procedures were not followed by certain Salesforce employees in relation to these gifts and hospitality.

- **Who makes these decisions within Salesforce's Office of Global Ethics and Integrity?**

Salesforce's GE&I team in the Asia Pacific region, including in Australia, reviews employee requests to offer gifts or hospitality to government employees in the region. This team reviews and then approves or rejects gifting requests with support and input from Salesforce's global public sector compliance team that focuses specifically on public sector



ethics issues (including gifts and hospitality). GE&I reviews public sector gifting requests for compliance with our Employee Code of Conduct, Global Gifts and Entertainment Policy and implementing guidelines, as well as applicable laws and regulations.

- **Has Salesforce's Office of Global Ethics and Integrity ever declined a request to approve hospitality for an Australian Commonwealth official?**

Yes. The GE&I team conducts the review described above and approves some hospitality requests and rejects others, based on their individual facts, circumstances, and overall context.

Salesforce is working to obtain the requisite information in order to prepare a table of hospitality provided to Commonwealth officials by agency for the last 3 years consistent with the format Salesforce provided in relation to the NDIA, and advise as to whether each item was approved by Salesforce's Office of Global Ethics and Integrity.

Please do not hesitate to contact me if you have any additional questions.

Yours sincerely

Sassoon Grigorian
Vice President, Government Affairs & Public Policy, Asia Pacific