



Modern Slavery Act Transparency Statement

The United Kingdom Modern Slavery Act of 2015, The Canadian Fighting Forced Labor and Child Labor in Supply Chains Act of 2023, and The Modern Slavery Act 2018 of Australia require certain companies to provide disclosure concerning their efforts, if any, to address the issues of modern slavery, human trafficking, and child labor in their businesses and supply chains. The disclosures are intended to provide consumers the ability to make better, more informed choices about the products and services they buy and companies they support. This statement constitutes the modern slavery and human trafficking statement for the financial year ending January 31, 2025. Throughout this statement we reference “modern slavery,” which includes forced labor, debt bonded, indentured, child, slave, or involuntary labor.

PagerDuty, a global leader in Digital Operations Management, is publicly traded on the New York Stock Exchange (NYSE: PD), and headquartered in San Francisco, California. PagerDuty provides a platform for real-time operations, with a mission to connect teams to real-time opportunity and elevate work to the outcomes that matter.

Summary

PagerDuty is committed to not only abide by the laws and regulations that apply to us as we conduct business around the world, but also to acting ethically and with integrity in all our business relationships and maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.

Our Supply Chain

PagerDuty has a central procurement function in the United States. Considering the nature of our business, our supply chain mostly consists of the hiring of independent consultants and other service providers and the procurement of other software-related goods and services. As it relates to our supply chain, we consider ourselves to be low risk. We source goods and services from reputable suppliers and the nature of the goods and services we do procure do not demand the types of labor at risk for modern slavery and human trafficking. We will not support a supply chain where we are aware of or have reasonable grounds to believe that modern slavery and human trafficking are taking place. If we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for or cooperating in, appropriate remediation through legitimate processes, up to and including termination of the supply contracts, wherever possible.

Channel Partners

We contractually require our channel partners to comply with applicable laws and with our Code of Business Conduct and Ethics (the "Code"). We expect that our contractors, partners, resellers, vendors and other suppliers comply with all applicable laws, which may include the Modern Slavery Act of 2015, depending on the nature of a particular transaction.

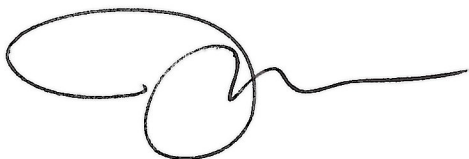
Code of Business Conduct and Ethics

The PagerDuty Code of Business Conduct and Ethics outlines how PagerDuty and its subsidiaries conduct business and describes the company's most fundamental shared values. It provides PagerDuty employees guidance on how to follow company policies, applicable laws, rules and regulations, as it is vital that all employees act with integrity and in accordance with local laws. Our Code is available externally on our website so anyone is able to report any concerns or questions regarding any potential violations of the Code or any of our other policies or any applicable law, rules or regulations, including modern slavery and human trafficking violations.

Our Code of Business Conduct and Ethics is distributed annually to all directors, officers, employees and contractors who are required to acknowledge they understand and are compliant with the Code. All employees receive mandatory training on our Code of Business Conduct and Ethics.

We recognize and understand the importance of the Modern Slavery Act and are committed to reviewing and assessing the risks in our supply chain. As we expand our business activities and work with suppliers and channel partners globally, we remain committed to abiding by applicable laws and regulations, as well as doing our part to actively prohibit modern slavery and human trafficking within our influence, to include our business, channel partners and supply chain.

This statement was approved by the directors of PagerDuty, Inc., a US company, PagerDuty, Inc., a Canadian company, PagerDuty, Pty Ltd., an Australian company, and PagerDuty, Ltd., a UK company, and signed on each board's behalf by:

A handwritten signature in black ink, appearing to read 'Jennifer Tejada', with a large, stylized loop at the beginning and a long, horizontal flourish extending to the right.

Jennifer Tejada

Director

Date: October 15, 2025