

System and Organization Controls 3 Report

Management's Report of its Assertions on the Effectiveness of Its Controls over the Workday Enterprise Products Based on the Trust Services Criteria for Security, Availability, Confidentiality, Processing Integrity, and Privacy

For the Period October 1, 2021 to September 30, 2022





Management's Report of its Assertions on the Effectiveness of Its Controls over the Workday Enterprise Products Based on the Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy

We, as management of Workday, Inc. are responsible for:

- Identifying the Workday Enterprise Products (System) and describing the boundaries of the System, which are presented in Attachment A
- Identifying our principal service commitments and system requirements which are presented in Attachment A
- Identifying the risks that would threaten the achievement of its service commitments and service requirements that are the objectives of our system
- Identifying, designing, implementing, operating, and monitoring effective controls over the Workday Enterprise Products (System) to mitigate risks that threaten the achievement of the service commitments and system requirements
- Selecting the trust services categories that are the basis of our assertion

Workday, Inc. uses Amazon Web Services (AWS) (Subservice Organization) to provide data center hosting (physical security and environmental safeguards), infrastructure support and management, and storage services. The boundaries of the System presented in Attachment A includes only the controls of Workday and excludes controls of AWS. However, the description of the boundaries of the system does present the types of controls Workday assumes have been implemented, suitably designed, and operating effectively at AWS. Certain trust services criteria can be met only if AWS's controls assumed in the design of Workday's controls are suitably designed and operating effectively along with the related controls at Workday. However, we perform annual due diligence procedures for third-party sub-service providers and based on the procedures performed, nothing has been identified that prevents us from achieving our specified service commitments and system requirements.

We assert that the controls over the system were effective throughout the period October 1, 2021 to September 30, 2022, to provide reasonable assurance that the service commitments and system requirements were achieved based on the criteria relevant to security, availability, processing integrity, confidentiality, and privacy set forth in the AICPA's TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy, if the Subservice Organization applied the controls assumed in the design of Workday's controls throughout the period October 1, 2021 to September 30, 2022.

Workday, Inc.



Ernst & Young LLP Suite 1600 560 Mission Street San Francisco, CA 94105-2907 Tel: +1 415 894 8000 Fax: +1 415 894 8099 ev.com

Report of Independent Accountants

Management of Workday, Inc.:

Scope

We have examined management's assertion, contained within the accompanying Management's Report of its Assertions on the Effectiveness of Its Controls over the Workday Enterprise Products Based on the Trust Services Criteria for Security, Availability, Confidentiality, Processing Integrity, and Privacy (Assertion), that Workday's controls over the Workday Enterprise Products (System) were effective throughout the period October 1, 2021 to September 30, 2022, to provide reasonable assurance that its service commitments and system requirements were achieved based on the criteria relevant to security, availability, confidentiality, processing integrity, and privacy (applicable trust services criteria) set forth in the AICPA's TSP section 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy.

Workday, Inc. uses Amazon Web Services (AWS) (Subservice Organization) to provide data center hosting (physical security and environmental safeguards), infrastructure support and management, storage services. The Description of the boundaries of the System (Attachment A) indicates that Workday's controls can provide reasonable assurance that certain service commitments and system requirements, based on the applicable trust services criteria, can be achieved only if AWS's controls, assumed in the design of Workday's controls, are suitably designed and operating effectively along with related controls at the service organization. The description of the boundaries of the system presents Workday's system and the types of controls that the service organization assumes have been implemented, suitably designed, and operating effectively at AWS. Our examination did not extend to the services provided by AWS and we have not evaluated whether the controls management assumes have been implemented at AWS have been implemented or whether such controls were suitably designed and operating effectively throughout the period October 1, 2021 to September 30, 2022.

Management's responsibilities

Workday management is responsible for its assertion, selecting the trust services categories and associated criteria on which its assertion is based, and having a reasonable basis for its assertion. It is also responsible for:

- Identifying the System and describing the boundaries of the System
- Identifying its service commitments and system requirements and the risks that would threaten the achievement of its service commitments and service requirements that are the objectives of our system
- Identifying, designing, implementing, operating, and monitoring effective controls over the System to mitigate risks that threaten the achievement of the service commitments and system requirement

Our responsibilities

Our responsibility is to express an opinion on the Assertion, based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion, which includes: (1) obtaining an understanding of Workday's relevant security, availability,



confidentiality, processing integrity, and privacy policies, processes and controls, (2) testing and evaluating the operating effectiveness of the controls, and (3) performing such other procedures as we considered necessary in the circumstances. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error. We believe that the evidence obtained during our examination is sufficient to provide a reasonable basis for our opinion.

Our examination was not conducted for the purpose of evaluating Workday's cybersecurity risk management program. Accordingly, we do not express an opinion or any other form of assurance on its cybersecurity risk management program.

We are required to be independent of Workday, Inc. and to meet our other ethical responsibilities, as applicable for examination engagements set forth in the Preface: Applicable to All Members and Part 1 - Members in Public Practice of the Code of Professional Conduct established by the AICPA and have applied the AICAP's Statement on Quality Control Standards.

Inherent limitations

Because of their nature and inherent limitations, controls may not prevent, or detect and correct, all misstatements that may be considered relevant. Furthermore, the projection of any evaluations of effectiveness to future periods, or conclusions about the suitability of the design of the controls to achieve Workday's service commitments and system requirements, is subject to the risk that controls may become inadequate because of changes in conditions, that the degree of compliance with such controls may deteriorate, or that changes made to the system or controls, or the failure to make needed changes to the system or controls, may alter the validity of such evaluations. Examples of inherent limitations of internal controls related to security include (a) vulnerabilities in information technology components as a result of design by their manufacturer or developer; (b) breakdown of internal control at a vendor or business partner; and (c) persistent attackers with the resources to use advanced technical means and sophisticated social engineering techniques specifically targeting the entity.

Opinion

In our opinion, Workday's controls over the System were effective throughout the period October 1, 2021 to September 30, 2022, to provide reasonable assurance that its service commitments and system requirements were achieved based on the applicable trust services criteria if the Subservice Organization controls assumed in the design of Workday's controls operated effectively throughout the period October 1, 2021 to September 30, 2022.

December 21, 2022

Ernst + Young LLP



ATTACHMENT A - CORPORATE OVERVIEW AND SCOPE OF SERVICES

A. WORKDAY SYSTEMS OVERVIEW

Workday, Inc. ("Workday" or the "Company"), headquartered in Pleasanton, California, is a provider of enterprise cloud applications for finance and human resources. Founded in 2005, Workday delivers applications for financial management, human resources, planning, spend management, and analytics to thousands of organizations around the world and across industries. Organizations ranging from medium-sized businesses to Fortune 50 enterprises have selected Workday.

Workday's top priority is keeping Customer Data secure. Workday employs security measures at the organization, architectural, and operational levels to ensure that Customer Data, applications, and infrastructure remain safe.

Workday Enterprise Products encompass the following:

In-scope Workday Enterprise Products (Core Service, Workday Media Cloud, Workday Extend, Innovation Services)		
Workday Enterprise Products	Description	
Human Capital Management Talent Management Payroll and Workforce Management	Workday's human resource and talent management applications help organizations recruit, manage, train, organize, staff, pay, and develop a global workforce of both employees and contingent workers through the hire-to-retire process. • Human Capital Management • Talent Optimization • Payroll for US • Payroll for Canada • Payroll for France • Cloud Connect for Third Party Payroll • Cloud Connect for Benefits • Time Tracking • Recruiting • Learning • Learning for Extended Enterprise	



In-scope Workday Enterprise Products (Core Service, Workday Media Cloud, Workday Extend, Innovation Services)	
Workday Enterprise Products	Description
Financial Management Spend Management Professional Services Automation	Workday's financial management applications help manage an organization's financial accounting, reporting and management of information necessary to operate and measure the organization. In addition, these applications support the planning, budgeting, order-to-cash, revenue management, procure-to-pay, and expense management processes.
	 Core Financials Accounting Center Expenses Procurement Inventory Grants Management Projects Project Billing Note 1: Report coverage does not include Workday Strategic Sourcing, which is addressed in the Workday Strategic Sourcing SOC audit report. Also, report coverage does not include VNDLY, which is addressed in the VNDLY SOC audit report. Note 2: The Workday Productivity Suite toolset, comprised of Drive, Worksheets, Slides, and Docs, are included in Human Capital Management and Core Financials products.
Enterprise Planning	Financial, workforce, sales planning, as well as analytics for the entire enterprise. • HCM Planning • Financials Planning • Financial Performance Management Note: Report coverage does not include Workday Adaptive Planning, which is addressed in the Workday Adaptive Planning SOC audit report.
Analytics and Reporting	Financial, workforce and operational analytics, and data management. • Workday Prism Analytics



Innovation Services)	
Workday Enterprise Products	Description
Student	Workday Student supports academic institutions in student recruiting, student application processing and admissions, managing courses, programs, enrollment and student records, academic advising, tracking financial aid, and managing student financial accounts. Workday Student includes dashboards and reports to support institutional effectiveness.
Platform and Product Extensions	Solutions for extensibility, including application development and integrations.
	Workday Extend – Allows customers to build custom applications alongside existing Workday products.
	Workday Success Plans (supported by Workday Credentials) – Provides guidance from Workday experts to help Customers troubleshoot configuration issues, provide advice on how to configure Workday to meet business requirements, and explore Workday product features.
	Workday Media Cloud (WMC) – Supports the upload, sharing, and playback of rich media to provide customers with an engaging, consumer-like experience across a variety of Workday applications, including Learning, Recruiting, Dashboard Announcements, People Experience, and more.
	Innovation Services – Products and services which enhance and optimize a Customer's experience and are made available under the Innovation Services Agreement. The following are in scope for the report:
	Public Data
	Advanced Benchmarks (as part of Workday DaaS)
	Workday Graph (Skills Cloud)
	Financial management ML GA Features
	Workday Assistant
	Benchmarking
	Workday Everywhere UCAA Macking Leaving Consults Assilable Features
	HCM Machine Learning Generally Available Features
	Learner Name Netification Designer
	Notification Designer Workday Journeys
	Workday Journeys



In-scope Workday Enterprise Products (Core Service, Workday Media Cloud, Workday Extend, Innovation Services)		
Workday Enterprise Products	Description	
	Cloud Connect for Learning	
	User Experience Machine Learning for Available Services	
	Workday Help	
	Spend Management ML	
	Workforce and Pay ML Available Services	
	Receipt Scanning for Expenses	
	Supplier Invoice Automation Scanning	
	People Analytics	
	Recommended Interview Scheduling	

In-scope Environments	
Environment	Description
Co-location Data Centers	Ashburn, Virginia Digital Realty Trust Sabey Hillsboro, Oregon Flexential Quality Technology Services (QTS) Dublin, Ireland Digital Realty Trust Atlanta, Georgia Quality Technology Services (QTS) Amsterdam, Netherlands Equinix Ontario, Canada Equinix



Environment	Description
Public Cloud	Workday offers Customers the option of running Workday applications in a public cloud environment hosted by AWS. Additionally, extended products and services such as Workday Extend, Machine Learning Development Environment (MLDE), Automated Training Environment (ATV), Machine Learning Platform Cluster (MLPC), Workday Media Cloud (WMC), Innovation Services (Workday Everywhere, Benchmarking) are also hosted in AWS. The following AWS regions are in scope:
	 AWS Canada (Central), ca-central-1 AWS EU West (Ireland), eu-west-1 AWS EU Central (Frankfurt), eu-central-1 AWS US East (Ohio), us-east-2 AWS US West (Oregon), us-west-2 AWS Asia Pacific (Singapore), ap-southeast-1 AWS Asia Pacific (Sydney), ap-southeast-2

Architecture

Software as a Service (SaaS)

Workday delivers its applications via a software-as-a-service (SaaS) model. In this service delivery model, Workday is responsible for providing the infrastructure (i.e., hardware and middleware), data security, software development (i.e., software updates and patches), and operational processes (i.e., operation and management of the infrastructure and systems to support the service).

Multi-tenancy

Multi-tenancy is a key feature of Workday Enterprise Products. Multi-tenancy enables multiple Customers to share one physical instance of the Workday system while isolating each tenant's (Customer's) application data. Workday accomplishes this through the Workday Object Management Server (OMS). Every Workday account is associated with exactly one tenant, which is then used to access the Workday application. All instances of application objects (such as Organization, Worker, etc.) are tenant-based, so every time a new object is created, that object is also irrevocably linked to the user's tenant. The Workday system maintains these links automatically and restricts access to every object based on the user ID. The Workday application restricts access to objects based on the Workday account and tenant.

Hosting Environments

The Workday application and Customer tenants are hosted in co-location data center facilities and/or public cloud service provider. Workday offers Customers the option of running Workday applications in a Public Cloud environment hosted on Amazon Web Services (AWS). Portions of Workday Extend, Media Cloud, Benchmarking, the Machine Learning Development Environment (MLDE), the Automated Training Environment (ATV), the Machine Learning Platform Cluster (MLPC) environment, and other Innovation Services are also hosted on AWS.



Sub-service Organizations and Complementary Subservice Organization Controls (CSOCs)

AWS is responsible for operating, managing, and controlling various components of the virtualization layer and storage as well as the physical security and environmental controls of these environments. Controls operated by AWS are not included in the scope of this report.

The affected criteria are included below along with the minimum controls expected to be in place at the aforementioned sub-service organization:

Sub-service Organization Controls		
Criteria	Control	
cc6.1: The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity's objectives.	Electronic intrusion detection systems are installed within data server locations to monitor, detect, and automatically alert appropriate personnel of security incidents.	
	Firewall devices are configured to restrict access to the computing environment and enforce boundaries of computing clusters.	
	VPC-Specific – Network communications within a VPN Gateway are isolated from network communications within other VPN Gateways.	
	KMS-Specific – Roles and responsibilities for KMS cryptographic custodians are formally documented and agreed to by those individuals when they assume the role or when responsibilities change.	
	KMS-Specific – The key provided by KMS to integrated services is a 256-bit key and is encrypted with a 256-bit AES master key unique to the customer's AWS account.	
CC6.2: Prior to issuing system credentials and granting system access, the entity registers and authorizes new internal and external users	IT access above least privileged, including administrator accounts, is approved by appropriate personnel prior to access provisioning.	
whose access is administered by the entity. For those users whose access is administered by the entity, user system credentials are removed when user access is no longer authorized.	User access to Amazon systems is revoked within 24 hours of the employee record being terminated (deactivated) in the HR System by Human Resources.	



Sub-service Organization Controls		
Criteria	Control	
other protected information assets based on	IT access above least privileged, including administrator access, is approved by appropriate personnel prior to access provisioning.	
roles, responsibilities, or the system design and changes, giving consideration to the concepts of least privilege and segregation of duties, to meet the entity's objectives.	User access to Amazon systems is revoked within 24 hours of the employee record being terminated (deactivated) in the HR System by Human Resources.	
	IT access privileges are reviewed on a periodic basis by appropriate personnel.	
CC6.4: The entity restricts physical access to facilities and protected information assets (for	Physical access to data centers is approved by an authorized individual.	
example, data center facilities, back-up media storage, and other sensitive locations) to authorized personnel to meet the entity's objectives.	Physical access is revoked within 24 hours of the employee or vendor record being deactivated.	
CC6.5: The entity discontinues logical and physical protections over physical assets only after the ability to read or recover data and software from those assets has been diminished and is no longer required to meet the entity's objectives.	All AWS production media is securely decommissioned and physically destroyed prior to leaving AWS Secure Zones.	
CC7.1: To meet its objectives, the entity uses detection and monitoring procedures to identify (1) changes to configurations that result in the introduction of new vulnerabilities, and (2) susceptibilities to newly discovered vulnerabilities.	AWS performs external vulnerability assessments at least quarterly, identified issues are investigated and tracked to resolution in a timely manner.	
CC8.1: The entity authorizes, designs, develops or acquires, configures, documents, tests, approves, and implements changes to infrastructure, data, software, and procedures to meet its objectives.	AWS applies a systematic approach to managing change to ensure changes to customer-impacting aspects of a service are reviewed, tested and approved. Change management standards are based on Amazon guidelines and tailored to the specifics of each AWS service.	



Sub-service Organization Controls		
Criteria	Control	
A1.2: The entity authorizes, designs, develops of acquires, implements, operates, approves, maintains, and monitors environmental protections, software, data back-up processes, and recovery infrastructure to meet its objectives.	Amazon-owned data centers are protected by fire detection and suppression systems.	
	Amazon-owned data centers are air-conditioned to maintain appropriate atmospheric conditions. Personnel and systems monitor and control air temperature and humidity at appropriate levels.	
	Uninterruptible Power Supply (UPS) units provide backup power in the event of an electrical failure in Amazon-owner data centers.	
	Amazon-owned data centers have generators to provide backup power in case of electrical failure.	
	Contracts are in place with third-party colocation service providers which include provisions to provide fire suppression systems, air conditioning to maintain appropriate atmospheric conditions, Uninterruptible Power Supply (UPS) units, and redundant power supplies. Contracts also include provisions requiring communication of incidents or events that impact Amazon assets and/or customers to AWS.	
	AWS performs periodic reviews of colocation service providers to validate adherence with AWS security and operational standards.	
A1.3: The entity tests recovery plan procedures supporting system recovery to meet its objectives.	When disk corruption or device failure is detected, the system automatically attempts to restore normal levels of object storage redundancy.	
	Objects are stored redundantly across multiple fault-isolated facilities.	
	The design of systems is sufficiently redundant to sustain the loss of a data center facility without interruption to the service.	
	If enabled by the customer, RDS backs up customer databases, stored backups for user-defined retention periods, and supports point-in-time recovery.	



B. Principal Service Commitments and System Requirements

Workday designs its processes and procedures to meet its objectives for Workday Enterprise Products. Those objectives are based on the service commitments that Workday makes to user entities, the laws and regulations that govern the provision of Workday Enterprise Products, and the financial, system, operational and compliance requirements that Workday has established for the services.

Workday makes certain Availability, Confidentiality, Privacy, Processing Integrity, and Security representations to its Customers as detailed in the MSA, Service Level Agreements (SLAs) and other Customer agreements, as well as in the description of the service offering provided online and within this report. Availability, Confidentiality, Privacy, Processing Integrity, and Security commitments include, but are not limited to, the following:

- Security and privacy principles within the Service that are designed for configurable security and compliance with regulations.
- Policies and mechanisms put in place to appropriately secure and separate Customer Data.
- Regular security monitoring and audits of the environment.
- Use of formal HR business processes such as background checks and Security and Privacy trainings.
- Use of encryption technologies to protect Customer Data both at rest and in transit.
- Monitoring and resolution of system incidents.
- Documentation, testing, authorization, and approval of Software and Operational Changes.
- Maintenance and monitoring of backups to ensure successful replication to meet the service commitments.
- Data integrity and availability monitoring for Production tenants and Production level platform environments.

Workday establishes operational requirements that support the achievement of Availability, Confidentiality, Privacy, Processing Integrity, and Security commitments, relevant laws and regulations, and other system requirements. Such requirements are communicated in Workday system policies and procedures, system design documentation, and contracts with Customers. Information security policies define an organization-wide approach to how systems and data are protected. These include policies around how the service is designed and developed, how the system is operated, how the internal business systems and networks are managed, and how employees are hired and trained. In addition to these policies, standard operating procedures have been documented on how to carry out specific manual and automated processes required in the operation and development of these system requirements as they relate to Workday Enterprise Products.



C. AVAILABILITY AND PROCESSING INTEGRITY

Operations teams are responsible for tracking and analyzing the availability of the Service for all customers in Production data center environments. Service availability metrics are reviewed by management on a quarterly basis. The process includes aggregation of the customer availability data on a monthly basis and comparison of that data to contractually-required Service Level Agreements (SLAs). This process also includes a monthly qualitative review based on the findings from activities that have an impact on the availability of the Service.

The processing integrity of Workday-delivered reports are covered in Workday's comprehensive Software Delivery process. This includes both manual end-to-end and automated Quality Assurance (QA) testing. Test procedures include, but are not limited to, data input/validation, recalculation, user interface, and security, to ensure functional design, completeness, and accuracy. For the Workday application, system validation occurs on data input into the application based on attribute type.

D. CONFIDENTIALITY

Signed nondisclosure agreements are required before information designated as confidential is shared with third parties. Workday maintains privacy and confidentiality practices in accordance with contractual obligations.

The Company does not, in the normal course of business, disclose Personal Data provided to the Company to third parties.

For operational processes outsourced to third parties, Workday obtains assurance through a report or certification on the effectiveness of the control environment documented by the outsourced provider's independent auditor. Each report or certification is reviewed on an annual basis by the Technology Compliance team, and reviews are documented using an internal tracking system. Security and privacy considerations are evaluated during the vendor contracting process. Any issues identified are evaluated based on risk and potential impact to the Company and its Customers.

The Company maintains privacy and confidentiality practices in accordance with contractual obligations. If privacy and confidentiality practices are materially lessened, customer consent is obtained prior to implementing the less restrictive practices.

E. PRIVACY AND SECURITY

Privacy Program

Privacy by Design and Privacy by Default principles are closely tied to Workday's core values and guide how Workday builds products, develops software, and operates services. In providing its Service, Workday has implemented policies and procedures that comply with global data protection laws and regulations. Detailed review by the Privacy and Compliance teams helps ensure products and releases adhere to applicable laws and requirements as well as internal documented policies and procedures. All major application releases are approved by the Chief Privacy Officer before moving to production, representing that Workday develops and designs its Service in conjunction with established Privacy by Design and Privacy by Default principles.



Security Program

Workday maintains a formal and comprehensive security program designed to ensure the security and integrity of customer data, protect against security threats or data breaches, and prevent unauthorized access to our customers' data.

F. CONTROL ENVIRONMENT

Leadership and Management

Workday Management is responsible for directing and controlling operations, as well as establishing, communicating, and monitoring company-wide policies and procedures. Management places a consistent emphasis on maintaining comprehensive, relevant internal controls and on communicating and maintaining high integrity and ethical values of the Company's personnel. Core values, key strategic elements, and behavioral standards are communicated to employees through new hire orientation, policy statements and guidelines, and regular company communications.

Personnel Security

Hiring Practices

Integrity and high ethical standards are fundamental values to Workday. Workday employs people who are selected for their intuition, intelligence, integrity, and passion for delivering superior solutions to Customers. Employment candidates are evaluated by Workday to determine whether their skills and experience are a fit for the Company prior to hire.

Enterprise Risk Management

Financial, IT, security, privacy, and relevant industry risks are periodically assessed and reviewed by Workday senior management.

On an annual basis, a formal risk assessment is performed by the Privacy and Technology Compliance teams as part of the ISO27001 Information Security Management System (ISMS) requirements. The risk assessment is performed by using the Workday ISO27001 risk assessment as a basis for risk identification, with additional risks that threaten the achievement of the control objectives added as appropriate. As part of this process, threats to security, confidentiality, availability, and integrity of Customer Data and threats to the privacy and protection of personal data provided as Customer Data are identified and the risks from these threats are formally assessed.

Based on the risk assessment, program changes are made, as necessary, and the Privacy and Technology Compliance teams monitor the effectiveness of the associated programs, including the Privacy program.

Information and Communication

Management is committed to maintaining effective communication with all personnel, Customers, and business partners. Issues or suggestions identified by Company personnel are promptly brought to the attention of management to be addressed and resolved.

To help align Workday's business strategies and goals with operating performance for its Customers, the Company's Products and Technology Release team has established appropriate communication methods and periodic meetings to review status and issues related to upcoming releases. Workday documents and shares internal content using web-based documentation repositories and issue tracking tools.



The Company regularly posts information about product enhancements on Workday Community. Workday Community contains information to assist Customers with Workday Enterprise Products.

Monitoring

Operations teams are responsible for monitoring the effectiveness of internal controls in the normal course of operations. Deviations in the operation of internal controls, including major security, availability, and processing integrity events are reported to senior management. In addition, any Customer issues are communicated to the appropriate personnel using a web-based issue tracking tool.