

Human Rights Impact Assessment

Resolved: Shareholders request the Board of Directors publish a report, at reasonable cost and omitting proprietary information, with the results of a Human Rights Impact Assessment (HRIA), examining actual and potential human rights impacts associated with the use of Palantir's products and services.

Whereas: The UN Guiding Principles on Business and Human Rights (“UNGPs”) expect companies to take all reasonable steps to ensure their products and services are not used to violate human rights. The UNGPs specify businesses should conduct ongoing human rights due diligence, of which HRIAs are a key tool,¹ to “identify, prevent, mitigate and account for ... adverse human rights impacts from their activities or as a result of their business relationships.”²

Palantir’s Human Rights Policy states it is aligned with the UNGPs, but it does not disclose whether it conducts HRIAs, without which stakeholders cannot be assured Palantir’s products and services are not violating human rights. Recent allegations of Palantir’s technologies being used to violate human rights and international humanitarian law (“IHL”) suggest the Company is not meeting its human rights responsibilities.

Palantir's technology has been utilized to analyze massive amounts of personal data, and in February 2026, Palantir’s CEO stated its "weapons software is in every combat situation I'm aware of."³ The following examples highlight human rights and IHL concerns:

- The Pentagon used Palantir's Maven to identify targets in Iran when the US bombed a school, killing 123 children.⁴
- Israel has reportedly used Palantir in its target identification process in its ongoing attacks on Palestinians in Gaza,⁵ actions prominent organizations and experts believe constitute war crimes and genocide.⁶
- Immigration and Customs Enforcement (“ICE”) and other US agencies use Palantir's software to combine social media activity with other private data to track and target migrants for detention and deportation, and to revoke people's immigration status.⁷ ICE's Investigative Case Management System, built by Palantir, profiles people, makes them easily searchable, and can track their locations.⁸
- The UK’s National Health Service (“NHS”) has a contract with Palantir; a leaked briefing showed NHS would allow unlimited access of identifiable patient information to non-NHS

¹ https://www.humanrights.dk/files/media/document/A%20HRIA%20of%20Digital%20Activities%20-%20Introduction_ENG_accessible.pdf

² https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

³ <https://gizmodo.com/palantir-touts-2-billion-in-revenue-from-aiding-trump-administrations-unusual-operations-2000717022>

⁴ <https://www.bloomberg.com/graphics/2026-iran-school-attack/>

⁵ <https://www.thenation.com/article/world/nsa-palantir-israel-gaza-ai/>; <https://www.un.org/unispal/document/a-hrc-59-23-from-economy-of-occupation-to-economy-of-genocide-report-special-rapporteur-francesca-albanese-palestine-2025/>

⁶ <https://www.un.org/unispal/document/a-hrc-59-23-from-economy-of-occupation-to-economy-of-genocide-report-special-rapporteur-francesca-albanese-palestine-2025/>; <https://www.amnesty.org/en/documents/mde15/8668/2024/en/>; <https://www.hrw.org/report/2024/12/19/extermination-and-acts-genocide/israel-deliberately-depriving-palestinians-gaza>; https://www.btselem.org/sites/default/files/publications/202507_our_genocide_eng.pdf

⁷ <https://www.washingtonpost.com/technology/2025/12/03/palantir-immigration-ice/>;

<https://www.npr.org/2025/05/01/nx-s1-5372776/palantir-tech-contracts-trump>

⁸ <https://www.theguardian.com/us-news/ng-interactive/2025/sep/22/ice-palantir-data>

staff, apparently to allow Palantir access to the sensitive data.⁹ This has sparked backlash and calls for the UK to terminate its Palantir contract.¹⁰

- Despite criticism and lawsuits that Palantir's predictive policing programs violate presumption of innocence, non-discrimination, and privacy,¹¹ they are reportedly still in use.¹²

Insufficient human rights due diligence exposes Palantir to material legal, financial, and reputational risks. For example, the Netherlands'¹³ largest pension fund, and one of Norway's largest asset managers¹⁴ have divested, citing human rights concerns, and there is growing pressure on others, such as state pensions funds, to divest.¹⁵ HRIAs can help companies fulfill their human rights responsibilities and mitigate risk.¹⁶

⁹ <https://www.theguardian.com/technology/2026/mar/12/palantirs-nhs-england-contract-opens-door-to-government-abuse-of-power-health-bosses-told>; <https://www.theguardian.com/society/2026/may/11/palantir-access-nhs-england-patient-data>

¹⁰ <https://www.theguardian.com/society/2026/sep/07/mistrust-of-ai-palantir-may-affect-nhs-research>

¹¹ <https://www.techpolicy.press/politicians-move-to-limit-predictive-policing-after-years-of-controversial-failures/>; <https://freiheitsrechte.org/en/themen/digitale-grundrechte/palantir-bayern>; <https://www.fairtrials.org/articles/news/fair-trials-tool-shows-how-predictive-policing-discriminates-and-unjustly-criminalises-people/>

¹² <https://file.lacounty.gov/SDSInter/bos/supdocs/185799.pdf>; <https://www.vice.com/en/article/300-californian-cities-secretly-have-access-to-palantir/>; <https://campaignzero.org/the-private-companies-quietly-building-a-police-state/>; <https://www.dw.com/en/german-police-expands-use-of-palantir-surveillance-software/a-73497117>

¹³ <https://nltimes.nl/2026/04/02/largest-dutch-pension-fund-cuts-ties-controversial-tech-firm-palantir>

¹⁴ <https://www.reuters.com/technology/thiels-palantir-dumped-by-norwegian-investor-over-work-israel-2024-10-25/>

¹⁵ <https://readsludge.com/2026/03/31/these-state-pension-funds-invest-in-palantir/>

¹⁶ https://www.humanrights.dk/files/media/document/A%20HRIA%20of%20Digital%20Activities%20-%20Introduction_ENG_accessible.pdf