



THE CITY OF NEW YORK  
**OFFICE OF THE COMPTROLLER**  
MARK D. LEVINE

February 4, 2026

Alexandra Schiff  
Member, Nominating and Corporate Governance Committee  
Board of Directors  
Attention: Legal Dept.

Palantir Technologies Inc.  
1200 17th Street, Floor 15  
Denver, Colorado 80202

Dear Ms. Schiff:

I am writing to you in your role as a member of the Nominating and Corporate Governance Committee, which currently lacks a publicly disclosed Chair, to request that the independent members of the board—or the appropriate independent Committee—commission and oversee an independent third-party human rights risk assessment of Palantir’s work with the Department of Homeland Security (DHS), including U.S. Immigration and Customs Enforcement (ICE). Conducting such an assessment, and disclosing its non-proprietary findings and recommendations, will allow the board to demonstrate to shareholders that it is exercising independent oversight of the legal, reputational, civil-rights, and human-rights risks associated with the Company’s involvement in federal law enforcement activities.

As Comptroller of the City of New York, I serve as investment adviser, custodian, and trustee of the five New York City public pension systems, which have approximately \$311 billion in assets under management and are substantial long-term beneficial shareholders of Palantir.

Recent fatal shootings in Minneapolis, as well as ICE activities more broadly, have drawn nationwide protests and intensified scrutiny of federal enforcement operations and highlighted material reputational and human rights risks to Palantir. While in 2020 Palantir “purposefully” declined to contract with ICE’s Enforcement and Removal Operations (ERO) over risks of “disproportionate immigration enforcement,” recent media reports suggest that Palantir has since expanded its involvement in ERO’s operations.<sup>1</sup> This stark reversal represents a material change in the Company’s role in these activities and underscores the potential for elevated enterprise risk with implications for long-term shareholder value.

The Palantir Board has a fiduciary responsibility to ensure that business strategies are evaluated through an enterprise risk lens aligned with long-term shareholder value. The apparent divergence between Palantir’s human rights commitments and the troubling public reports of ICE activities underscores the need for effective oversight.

Palantir's own recent statements heighten these concerns. In its Q4 2025 shareholder letter issued this week, the Company emphasized that its software helps prevent "an unconstitutional intrusion into the private lives of citizens by the state." Having framed its government work in expressly values-based terms, the board has a heightened obligation to ensure independent oversight of the civil- and human-rights risks those choices entail. Palantir has described its culture as one in which the "raw power of authority" is exercised with "true restraint." Those principles make independent board oversight of the Company's involvement in federal enforcement activities all the more essential.

Palantir's current corporate governance structure places particular responsibility on its independent directors to provide the level of oversight that long-term shareholders reasonably expect. In the first instance, Palantir maintains an insider-controlled governance structure, in which founders and executives retain disproportionate voting power. Additionally, the absence of a publicly disclosed Chair of the Nominating and Corporate Governance Committee together with the lack of lead independent director—despite the Company's corporate governance guidelines providing that one independent director may serve in that role—indicates a concerning lack of identifiable independent leadership on the board, exacerbating shareholder concerns. Given that independent directors typically receive risk-related information primarily from management, a third-party assessment would strengthen the board's ability to exercise effective oversight and evaluate whether management's conduct aligns with the Company's human rights commitments.

Under the UN Guiding Principles on Business and Human Rights referenced in Palantir's Human Rights Policy, companies are expected to conduct ongoing human rights due diligence to identify, prevent, mitigate, and account for how they address adverse impacts. Palantir's association with DHS and ERO presents material legal, reputational, and human capital risks. Media reports of internal employee concern further suggest these contracts may hinder retention, recruitment and long-term competitiveness.<sup>2</sup>

I also note that the civil- and human-rights risks associated with these federal enforcement activities may present specialized and non-routine matters for the board. Independent, third-party civil- and human-rights assessments are a recognized governance tool for enabling boards to evaluate these complex risks with appropriate expertise. For example, Airbnb and Uber have commissioned external assessments to examine risks related to civil liberties, human rights, and platform misuse, supporting informed and accountable board oversight.<sup>3</sup>

An independent human rights risk assessment and disclosure of its non-proprietary findings and recommendations would strengthen Palantir's governance, ensure alignment with the company's stated human rights commitments, mitigate material risk, and enhance long-term shareholder confidence.

Thank you for the board's consideration. I look forward to your written response.

Sincerely,



Mark D. Levine  
New York City Comptroller

cc: Board of Directors

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<sup>1</sup> [https://media.business-humanrights.org/media/documents/Palantir-Technologies-Response-to-Amnesty-International-Letter\\_VYQb6ID.pdf](https://media.business-humanrights.org/media/documents/Palantir-Technologies-Response-to-Amnesty-International-Letter_VYQb6ID.pdf); <https://www.wired.com/story/ice-palantir-immigrationos/>

<sup>2</sup> <https://www.wired.com/story/palantir-ice-dhs-alex-pretti-killing-workers-slack-minneapolis/>

<sup>3</sup> <https://www.scribd.com/document/741510242/Uber-CRA-Report-August-2023>; <https://news.airbnb.com/wp-content/uploads/sites/4/2022/12/A-Six-Year-Update-on-Airbnbs-Work-to-Fight-Discrimination-and-Build-Inclusion-12122022.pdf>