

Slavery and Human Trafficking Statement

For the financial year ended 30 June 2019

Our Organisation

Open Text Corporation (**OpenText**), The Information Company™, is a global software company and a leader in Enterprise Information Management (EIM). Our EIM products enable businesses to grow faster, lower operational costs, and reduce information governance and security risks by improving business insight, impact and process speed.

OpenText offers a suite of EIM solutions (including Artificial Intelligence and Analytics, Business Network, Enterprise Content Management, Customer Experience Management, Digital Process Automation and Discovery and Security), to serve the business needs of our worldwide customers.

EIM solutions manage the creation, capture, use and eventual lifecycle of structured and unstructured information. OpenText EIM solutions are designed to help organizations extract value from their information, secure that information, and meet the growing list of compliance requirements. The OpenText platform combines digital applications with an information platform to bring together Content Services, Security, the Business Network, IoT and the developer to optimize customer experience, employee engagement, asset utilization and supply chain efficiency.

Information is the most valuable commodity of the digital economy. It helps customers improve efficiencies, redefine business models and transform industries. Organizations must use new technologies to unlock the power of information, become more Intelligent and Connected through automation and artificial intelligence, application programming interfaces and data automation and drive engagement with customers, partners and employees.

OpenText is a publicly traded company listed on the NASDAQ (OTEX) and the Toronto Stock Exchange (OTEX). With its headquarters in Waterloo, Canada, OpenText employs over 13,000 employees in more than 120 locations worldwide. OpenText launched in 1991, originally as a project out of the University of Waterloo, evolving over the next 25+ years with the shifting digital landscape, and acquiring companies and products along the way, becoming a global leader in EIM.

OpenText strives to enrich the way people use information, foster innovation, be trusted in our relationships, be committed to excellence in all that we do, and work with our stakeholders, demonstrating honesty and passion towards common goals.

For more information on who we are and what we do, we welcome you to visit www.opentext.com.

This statement is made on behalf of two UK entities within the OpenText group, GXS Limited and Open Text UK Limited, pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act").

Our Supply Chain

As a software company, OpenText neither operates in an industry, nor has an extensive range of local or international suppliers, where in each case modern slavery or human trafficking would be a material risk. We are fully committed to ensuring prevention of slavery and human trafficking in our corporate activities by promoting transparency in our organization and throughout our supply chain. Our supply chain predominantly consists of:

- suppliers of products and services used, incorporated into, or sold alongside our own product and services offerings (including facilities providers, software development, support service providers, cloud service providers, IT service providers, ICT hardware and the like)

- suppliers of products and services for marketing merchandise, ICT hardware, stationery, cleaning, catering, maintenance services, travel providers, hospitality services, security and recruitment agencies
- professional services of various advisors, including external law firms, tax advisors, accountants and insurance brokers

OpenText has a central Procurement department that manages the procurement of goods and services in accordance with our organization's procurement policy. We are dedicated to conducting our business ethically and in compliance with all applicable laws. Through their dealings with our Procurement department, we require our suppliers to maintain the same standard of excellence.

Our policies and commitments

We are committed to being responsible corporate citizens. Through numerous volunteer initiatives, we support education and innovation for global change. In keeping with this promise, we have developed a program to help ensure we direct our resources where the most impact will be made. As a global leader in our industry, we have a great responsibility to give back to our communities around the world and to focus our attention, whether it be through monetary support or voluntary commitment, to efforts which better our communities. Full details of our Corporate Giving Program can be found [here](#).

We firmly believe that our success comes from the diversity and strength of our workforce. Our people are our number one winning strategy – which is why we strive to attract and retain the very best the industry has to offer. We value and respect our employees and are committed to providing direction for and leadership to our own people through the development and support of labour guidelines, policies and practices designed to benefit both individuals and the organization.

OpenText strives to create an environment based on respect for individuals and their needs, recognizing that a culture based on mutual respect is conducive to higher levels of productivity, teamwork and collaboration. We support an “employment equitable” work environment, free from discrimination of any kind. All employees share in this responsibility.

We are an equal opportunity employer and believe that a diverse workforce has significant positive results in attracting and retaining talent. We encourage a healthy, open, and inclusive working environment in which employees, suppliers, partners, and customers respect the value of human life and support social progress. Our Employment Equality & Diversity Policy is available upon request.

We are confident we offer our employees a competitive compensation package and attractive benefit plans, which include educational assistance, wellness / fitness reimbursement and time off to volunteer and participate in various charity events.

We also provide our employees with access to an employee assistance program which offers free and completely confidential help and advice with a wide range of questions and issues, from parenting concerns to health matters, from work issues to financial problems.

Our recruitment procedures include employment eligibility and, where applicable, background checks, in order to verify education, employment history and residential status. Our Talent Acquisition principles and processes support the equal treatment of applicants and employees.

Trust is one of our core values, and to maintain our company's position as a market leader, it is crucial for us to earn the trust of our customers, our employees, our investors, and the communities in which we operate. We are committed to complying with all applicable laws and regulations, and employees are not only expected to obey all applicable laws and regulations, but also to conduct themselves with integrity and respect. Our [Code of Business Conduct and Ethics](#) explains how we can do our part in achieving these objectives, and all employees, officers, directors, vendors, contractors and partners are expected to conduct themselves in a manner consistent with our Code of Business Conduct and Ethics.

It is important to us to maintain a workplace in which the company can receive and address concerns regarding any matter governed by the Code of Business Conduct and Ethics. Employees, officers and directors are encouraged to raise such concerns on a confidential basis, free from discrimination, retaliation or harassment, anonymously or otherwise, to our global compliance officer.

As part of the OpenText Board governance process, we regularly discuss, and where required revisit, our Code of Business Conduct and Ethics to make sure it stays up to date with applicable legislation worldwide, including the Act.

Additional OpenText policies and procedures which are applicable for reducing the risk of slavery or human trafficking taking place in our organization's business or in our supply chain include the following:

- Anti-corruption
- Global Information Security
- Workplace Harassment and Discrimination
- Occupational Health and Safety
- Respect in the Workplace
- Whistleblowing
- Grievance and Disciplinary
- Supplier Code of Conduct
- Sustainable and Ethical Procurement Policy

Corporate Citizenship

OpenText is committed to working toward sustainability in our operations and meeting the social and environmental expectations of our stakeholders. We are a signatory to the United Nations Global Compact. Our business operations are conducted in ways that respect human rights, support our workforce, and interact with our clients and suppliers with integrity. The foundations of our [Corporate Citizenship Program](#) align with our corporate values: to foster trust with our customers, employees, partners, and shareholders; demonstrate excellence; continually innovate; cultivate the company as the best place to work; and to ensure our customers are successful. Our Corporate Citizenship Program is modelled on the seven social responsibility core subjects of the International Organization for Standardization Guideline for Social Responsibility (ISO 26000).

One of the seven social responsibility core subjects in ISO 26000 is Organizational Governance, which depicts how an organization acts and its ability to behave in a socially responsible manner. This core subject guides organizational decision making and influences how individuals within an organization achieve their objectives for governance. In the context of social responsibility, Organizational Governance ensures decisions are not solely weighted on financial gain. In addition to Organizational Governance, the other six social responsibility core subjects are:

- Community Involvement and Development
- The Environment
- Human Rights
- Labour Practices
- Fair Operating Practices
- Consumer Issues

Due Diligence Processes and Effectiveness

Our Suppliers are expected to conduct their businesses responsibly and ethically and comply with applicable laws and regulations. Our [Supplier Code of Conduct](#) outlines the standards that we expect our suppliers to meet. Pursuant to the Supplier Code of Conduct, our Suppliers are required to have in place effective policies and procedures to manage ethical issues within their supply chain including, but not limited to, all labour-related processes.

Our supplier agreements make clear that suppliers must provide goods and services in accordance with our Supplier Code of Conduct, and that all OpenText policies and procedures must be adhered to. Where our agreement is not utilised, we include our own language requiring the supplier to adhere to our Supplier Code of Conduct.

Our [Sustainable and Ethical Procurement Policy](#) provides details on the expectations of our suppliers and subcontractors to operate in a manner that is both ethically responsible and sustainable. Expectations also relate to environmental responsibility, cultural practices, and supplier relationships based on the highest level of integrity, ethical standards, and fair and honest dealings.

In the financial year 2019, our purchase order terms and conditions were updated to include a hyperlink to our Supplier Code of Conduct and Supplier Site requirements. New suppliers are subject to an appropriate level of risk assessment and screening. Our request for proposal template has been updated to include risk analysis questions to prospective suppliers, seeking to elicit information on a supplier's business model and how its supply chain is engaged, as well as the composition of a supplier's workforce.

To the best of our knowledge, slavery and human trafficking do not exist in our organization or our supply chain. Nevertheless, we will continue to review and monitor our systems and controls in order to identify any potential risk areas.

Staff Training

As a publicly traded, global company, employees are requested to complete a number of mandatory compliance training courses as a result of industry, regional or corporate requirements, and to familiarise themselves with our corporate policies and procedures. In particular, all employees must complete annual Code of Business Conduct and Ethics training.

This statement was approved by the board of directors of both GXS Limited and Open Text UK Limited on 18 December 2019.



Gordon A. Davies

Director

For and on behalf of GXS Limited and Open Text UK Limited

Executive Vice President, Chief Legal Officer and Corporate Development
For and on behalf of OpenText