

Slavery and Human Trafficking Statement

For the financial year ended 30 June 2020

Our Organization

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 (comprising of Content Services, Business Network, Cyber Resilience, Digital Experience and Advance Technologies), to serve the business needs of our worldwide customers.

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 14,000 employees worldwide. OpenText launched in 1991, originally as a project out of the University of Waterloo, evolving over the years with the shifting digital landscape, and acquiring companies and products along the way, becoming a global leader in EIM.

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

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

Our Policies and Commitments

We take very seriously our responsibilities to:

- Act ethically and with integrity in every situation, and to support an ethical supply chain
- Embrace diversity, inclusion, and respect in our workplace, and to empower our employees
- Work with local organizations to support the communities in which we operate
- Mitigate our environmental impact and help our customers do the same

We are committed to our role as a responsible corporate citizen. Through numerous initiatives, we support education and innovation for global change, children and family and global disaster relief. 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](#).

Diversity and inclusion

With over 14,000 employees worldwide, working across teams and cultures to innovate and deliver solutions to our clients, is part of who we are. Our culture is embraced in the day to-day and reinforced through the design of our talent programs. From flexibility in how we work to a commitment to ensuring fairness in our recruiting and development processes, our goal is to harness the power of diversity.

Our Employment Equity and Diversity Policy provides direction on maintaining a working environment that is inclusive of everyone, regardless of culture, national origin, race, color, gender, gender identification, sexual orientation, family status, age, veteran status, disability, religion, or other basis protected by applicable laws. We believe that a diverse workforce better our ability to innovate. Our Accommodation Policy ensures that employees with a need for accommodation are recognized, and barriers to their performance are removed wherever possible.

We strive to present diverse slates of candidates for all our roles and mandate it for our senior leader positions. This year, companies around the world have had to navigate the uncertainty of COVID-19. At OpenText, we moved our employees to remote work to ensure the safety of our employees, customers and partners. As we look to return to the workplace, we will continue to be guided by the overarching principle of ensuring employee, customer and partner safety. A key benefit of embracing a more flexible and remote return-to-work as a result of COVID-19 is the opportunity to access a broader and deeper talent pool.

Twice per year, we reach out to employees through a global opinion pulse survey to find out how we are doing on a range of topics, from articulating the company vision to supporting their career development. We include questions about how well we value diversity of opinion and respect differences. The answers to these questions were among the highest scoring items on our last survey circulated in January 2020.

We also recognize the importance of increasing female representation in the technology industry and created the Women in Technology (WIT) program to advance gender equality. Each year, we send delegates to the Grace Hopper Celebration, the world's largest gathering of women in technology. The women we send are trailblazers at OpenText, inspiring and emerging leaders who will drive change in our company and beyond.

We have worked diligently to improve gender diversity within OpenText, and to remove biases from our recruitment, hiring and training programs. 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.

Compensation and benefits

We are confident we offer our employees a competitive compensation package and attractive group benefit plans, including medical, life and disability benefits, which are designed to protect employees and their dependents against financial hardship due to illness or injury. Further benefits include, but are not limited to, education and professional membership assistance, fitness and wellness reimbursement and employee stock purchase plan.

We 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.

In response to the unprecedented COVID-19 crisis we have launched a number of programs to help our employees and communities with the additional challenges brought on by the pandemic. This includes the OpenText Employee Relief Fund, to support employees in the event of financial hardship incurred as a result of the pandemic. We recognize that working together and supporting each other will make us stronger.

We build programs through an inclusion and diversity lens. We design our programs and challenge our benefits vendors to ensure all family types and offer coverage for same sex partners. Our time-off policies recognize that employees can only bring their best selves to work when they take the time they need. We remind our employees to take their vacation time, to recharge and re-energize, and we ensure our time-off policies provide flexible time off for religious observation and volunteer activities.

As we look to the future, we know how critical issues related to well-being, including mental health, will continue to be for our industry and our communities. We want to ensure that employee wellness is a top priority and that our plans help make life a little easier and help balance work and personal life so our employees can focus on what's important. We plan to continue to evolve our benefits programs to address these needs.

Recruitment

Our recruitment procedures include a robust background check policy and recruitment process to ensure that people working for us are of legal age and have legal status. In addition, background checks are performed in order to verify education, employment history and residential status, where applicable. 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 important 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.

Respect for human rights is embedded in our Code of Business Conduct and Ethics and reflected in our labor policies, which address the fundamental conventions of the International Labour Organization (ILO). Specific commitments include taking action against human trafficking, child labor, and forced labor in our operations and supply chain, and a prohibition from engaging in trafficking in persons, including, but is not limited to, the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labor of any form. Any employee believing he or she has been a victim of human trafficking, child labor or forced labor, or has knowledge of such offenses must report any such incident to his or her manager, the next level of management, Human Resources or the Compliance Officer.

In the workplace, we are dedicated to creating an environment where every employee is safe, treated with dignity and respect, and afforded equal opportunities to succeed. Our annual Code of Business

Conduct and Ethics training covers human rights issues and additional training is provided in specific regions or countries where legally required.

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 Compliance Officer.

As part of the OpenText Board governance process, we review the Code of Business Conduct and Ethics annually to ensure that it remains robust, addresses evolving risk and circumstances and stays up to date with applicable legislation worldwide, including the Act.

Additional OpenText policies and procedures which are relevant for mitigating the risk of slavery or human trafficking occurring in our organization's business or in our supply chain include the following:

- Approvals & Signing Authorities
- Anti-corruption
- Accommodation
- Background Checks
- Employment Equity and Diversity
- Employee Privacy / Notice
- Workplace Violence Prevention
- Working Conditions
- Global Information Security
- Workplace Harassment and Discrimination
- Health & Safety Corporate Statement
- Occupational Health and Safety
- Respect in the Workplace
- Whistleblowing
- Grievance and Disciplinary
- Supplier Code of Conduct
- Sustainable and Ethical Procurement Policy

Corporate Citizenship

We view corporate citizenship as an important aspect of being a responsible business, along with having effective enterprise risk management practices and giving due consideration to environmental, social and governance (ESG) factors that can affect our company's long-term performance. When these three aspects are aligned, we not only do better as a business, we are also better positioned to face the challenges ahead and make a greater social contribution. Our actions are guided by our overarching Purpose, Promise and People commitments, which inspire us to higher levels of performance.

- Purpose

We are The Information Company, enabling intelligent and connected enterprises while inspiring a new way to work.

- Promise

1. Be deserving of trust
2. We sweat the details
3. Aim high
4. The best teams win
5. The unexpected wow

- **People**

i) Impact

ii) Diversity and inclusion

iii) Volunteerism

We are 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. In an age of information disruption, we see opportunity to use technology for the greater good – and we aspire to unlock its potential to advance societal goals and accelerate positive change. 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 inaugural [Corporate Citizenship Report](#) outlines our approach and practices. Our newly adopted corporate citizenship governance framework sets out a structured approach to pursuing and managing activities across the company. The Report outlines our priorities and actions in the following areas:

- Business conduct
- Data privacy, information security and cyber resiliency
- Our people
- Community
- Environment

Risk Assessment and Due Diligence

Our Suppliers are expected to conduct their businesses responsibly, ethically and sustainably and comply with applicable laws and regulations. Our [Supplier Code of Conduct](#) underpins our commercial relationships and outlines the standards that we require our suppliers to meet. We expect our Suppliers to have in place effective policies and procedures to ensure compliance with applicable labor laws including, but not limited to, laws related to slavery, servitude and forced or compulsory labor, bonded labor, child or otherwise underage labor, anti-human trafficking, wages and benefits, working hours, an employee's right to leave one's employment, freedom of association and collective bargaining. Suppliers are expected to have in place procedures to manage ethical issues within their supply chain including, but not limited to, all labour-related processes to ensure compliance with our requirements.

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 purchase order terms and conditions 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 includes 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.

We have joined various industry initiatives to help accelerate progress and impact. Many of our customers use EcoVadis, a trusted third-party provider of business Corporate Social Responsibility (CSR) ratings, to assess their suppliers. OpenText currently has a bronze rating and is above industry average in all four scoring categories.

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.

Staff Training

As a publicly traded, global company, employees are required to complete on an annual basis 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 and sign off that they understand and are compliant with these organizational expectations.

Goals for Financial Year 2021

For the financial year ending 30 June 2021, our goal is to implement a Supplier Risk Monitoring solution, which will monitor against various government sanctions, adverse media (including labor, health & safety, ethical / regulatory and environmental matters) and financial / credit risks. This active monitoring will provide us with a means to further ensure that suppliers are compliant with relevant legislation and key elements of our Supplier Code of Conduct.

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 and remain committed to improving our practices and procedures to combat slavery and human trafficking.

This statement constitutes our slavery and human trafficking statement for the financial year ended 30 June 2020. It was approved by the board of directors of both GXS Limited and Open Text UK Limited on 26 February 2021.



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