Modern Slavery and Human Trafficking Statement

For the financial year ended 30 June 2021

Our Organization

Open Text Corporation (**OpenText**), The Information Company™, is a world leader in Information Management (IM), enabling organizations to gain insight through market leading information management solutions, powered by OpenText Cloud Editions.

Open Text offers a complete and integrated portfolio of IM solutions, helping organizations master modern work, power modern experiences and optimize their digital supply chains. To do this, we bring together our Content Cloud, Business Network Cloud, Experience Cloud, Security and Protection Cloud and Developer Cloud with advanced technologies such as AI, analytics, automation and related services 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 to create the first online version of the Oxford English Dictionary, evolving over the years with the shifting digital landscape, and acquiring companies and products along the way, becoming a global leader in IM.

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 human resource services, including 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 direct our resources where they will have the most impact. Full details of our Corporate Giving Program can be found here.

Equity, 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.

We have a comprehensive Equity, Diversity and Inclusion (ED&I) program, focussing on supporting and developing under-represented minorities, with a strong emphasis on gender, race and Black communities. There are five strategic pillars to our ED&I approach: Awareness, Hiring & Development, Civic Action, Power of Business and Analysis & Governance. For each pillar, we have teams composed of passionate volunteers that drive focussed initiatives, and all employees are encouraged to participate in our ED&I programs.

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, class, caste, religion, or other basis, including those protected by applicable laws. We firmly believe in the power of diversity and the ability of multiple backgrounds and points of view to contribute to a stronger whole.

We recognize the importance of increasing female representation in the technology industry and created the Women in Technology (WIT) program to advance gender equality. In the financial year 2021, OpenText expanded the WIT program with the introduction of our WIT Affinity Group. Since its inception, this group has evolved into a robust community with representation across every continent from over 800 participants. Our Employment Equity & 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, which are designed to protect employees and their dependents against financial hardship due to illness or injury.

Our time-off policies recognize that employees can only bring their best selves to work when they are well rested and focussed. 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 that critical issues related to well-being, including mental health, will continue to be a part of our industry, our workplaces, and our communities. Employee wellness is a top priority, and plans are in place to help make life easier and to ensure a work-life balance. We will continue to evolve our benefits programs to address our employees' evolving needs.

Recruitment

We take a holistic approach to making OpenText a great place to work by creating a work environment in which employees want to stay, grow and thrive by fostering a safe and inclusive space for all employees. We believe in equal opportunity for all, and with this in mind, we work hard to ensure that our open positions are accessible and desirable to all who are interested in applying.

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 in our [Human Rights Statement](#), 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. OpenText employees are prohibited from engaging in trafficking in persons, which includes 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 is proactively communicated to employees and included in annual compliance training. 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
- Grievance and Disciplinary
- Health & Safety Corporate Statement
- Occupational Health and Safety

- Respect in the Workplace
- Supplier Code of Conduct
- Whistleblowing
- Working Conditions
- Workplace Harassment and Discrimination
- Workplace Violence Prevention

Corporate Citizenship

We understand that corporate citizenship is the foundation of a responsible business and giving due consideration to environmental, social, and governance (ESG) factors that can affect our company's long-term performance. When these three vectors are aligned, not only do we operate more efficiently as a business, but we are better positioned to face the challenges ahead and make a greater contribution to society. Our actions are guided by core values that inspire us to achieve higher levels of performance. These values inform how we work, both through our culture and our practices.

Our Values

- Be deserving of trust
- We sweat the details
- The unexpected wow
- We aim high
- We, not I

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 second Corporate Citizenship Report outlines our priorities, practices and ambitions. Our 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:

- Data Privacy & Information Security
- Equity, Diversity & Inclusion
- Culture & Human Capital Development
- Financial Performance

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. Our expectations apply to supplier environmental responsibility, upholding human rights, integrity, and fair and honest dealings. To the extent reasonably possible, we will not knowingly engage with suppliers (including their supply chain) that are likely to cause adverse social and environmental impacts. We prioritize suppliers who demonstrate that they have embedded sustainability within their products, their operations and their supply chains.

We are committed to equity, diversity and inclusion within our supply chain and believe that diversity contributes to innovation. We expect all of our suppliers to conduct themselves in a manner consistent with our Supplier Code of Conduct and to have in place their own internal policies and practices to

promote equity, diversity and inclusion across their organization and supply chain. We also expect all of 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 Request for Proposal (RFP) 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. Our RFP also now includes sustainability criteria, including whether suppliers report on their social and environmental performance, have public commitments and goals, and whether they have third party sustainability certifications corporate-wide or specific to the products/services they supply to OpenText.

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, together with our supplier agreements, include a termination clause for non-compliance of our Supplier Code of Conduct as a material breach.

In the financial year 2021, a trusted supplier risk monitoring solution was implemented. New suppliers are subject to an appropriate level of risk assessment and screening. We monitor against various government sanctions, violations (including labor, health & safety, ethical/regulatory and environmental matters) and financial/credit risks. This active monitoring provides us with a means to further ensure that suppliers are compliant with relevant legislation and key elements of our Supplier Code of Conduct. As part of our review, we also receive corporate social responsibility ratings for our top tier suppliers. Active monitoring of our top tier suppliers provides us with a means to ensure that they are compliant with relevant legislation and key elements of our Supplier Code of Conduct. Suppliers identified as having a higher risk are requested to provide additional information to ensure they have social and environmental policies and practices in place to mitigate.

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. For the financial year 2021, OpenText had a bronze rating.

Our Enterprise Risk Management program drives the identification, analysis and management of risk across OpenText. The board of OpenText has overall responsibility for risk oversight. The board is responsible for overseeing management's implementation and operation of enterprise risk management, either directly or through its committees, which report to the board with respect to risk oversight undertaken in accordance with their respective charters.

At least annually, the board reviews with management the risks inherent in the business of the company (including appropriate crisis preparedness, business continuity, information systems controls, cybersecurity, disaster recovery plans and environmental, social and governance matters), the appropriate degree of risk mitigation and risk control, overall compliance with and the effectiveness of the company's risk management policies, and residual risks after implementation of controls.

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.

Key Performance Indicators and Goals for the Financial Year 2022

We will continue to monitor against various government sanctions, violations (including labor, health and safety, ethical/regulatory and environmental matters) and financial/credit risks utilizing our supplier risk monitoring solution, monitoring the percentage of suppliers that fall into medium or high-risk categories. We aim to develop a statutory declaration to be signed by suppliers identified as medium and high-risk by geography and type of service, declaring that they will provide services in line with the Act and applicable legislation worldwide.

Modern slavery awareness training packages will be created specifically tailored to our Procurement team working with our suppliers, and we will monitor the number of staff that access this training.

Whilst 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 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. To the best of our knowledge, slavery and human trafficking do not exist in our organization or our supply chain.

This statement constitutes our slavery and human trafficking statement for the financial year ended 30 June 2021. It was approved by the board of directors of both GXS Limited and Open Text UK Limited on 7 February 2022.

Christian Waida

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

Senior Vice President & General Counsel, Commercial Operations
For and on behalf of OpenText