opentext™

Slavery and Human Trafficking Statement

For the financial year ending 2017

Our Organisation

Open Text Corporation (OpenText) is a global software company, and the 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.

We offer a suite of EIM solutions (including Analytics, Content, Discovery, Experience and Process suites, as well as our Business Network solutions) to suit the business needs of our worldwide customers.

OpenText is headquartered in Waterloo, Canada, employing approximately 12,000 employees in its various affiliates in more than 130 locations worldwide. We began life 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.

We strive 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.

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. Nevertheless, we are dedicated to conducting our business ethically and in compliance with all applicable laws, and we expect our suppliers to maintain the same standard of excellence.

We are fully committed to ensuring prevention of slavery and human trafficking in our corporate activities by promoting transparency in our business 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, hospitality services, security and recruitment agencies
- professional services of various advisors, including external law firms, tax advisors, accountants and insurance brokers

Our policies and commitments

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. OpenText is an equal opportunity employer, and we believe that a diverse workforce has significant positive results in attracting and retaining talent. For more information on this important topic, we welcome you to review our Employment Equality & Diversity Policy.

We are confident we offer our employees a competitive compensation package and attractive benefit plans. Our recruitment procedures include employment eligibility and, where applicable, background checks, in order to verify education, employment history, and residential status.

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.

Additional OpenText policies and procedures include the following:

- Anti-corruption
- Global information security
- Workplace harassment and discrimination
- Occupational Health and safety
- Whistleblowing
- Grievance and disciplinary

It is important to us to maintain a workplace in which the company can receive, retain 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 Modern Slavery Act 2015 (the Act).

Our Corporate Social Responsibility Progam is modeled on the seven social responsibility core subjects of the International Organization for Standardization Guideline for Social Responsibility (ISO 26000). These core subjects are:

- Organisational Governance
- Community Involvement and Development
- The Environment
- Human Rights
- Labour Practices
- Fair Operating Practices, and
- Consumer Issues.

Our Corporate Social Responsibility Program aligns 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 ensure our customers are successful.

Our [Supplier Code of Conduct](#) has been updated as a consequence of the Act to include specific language in relation to slavery and human trafficking. Our Suppliers are 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 have also been updated to 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. In addition, we are in the process of updating our PO terms and conditions to include our Supplier Code of Conduct and Supplier Site requirements.

To the best of our knowledge, slavery and human trafficking do not exist in our business or our supply chain. Nevertheless, we will continue to review and monitor our systems and controls in order to identify any potential risk areas. We are currently in the process of implementing our new dedicated Corporate Social Responsibility Procurement Policy, which will outline the policies, processes and control measures suppliers are to have in place in order to undertake business with us. As part of our continuous improvement, we will be updating our procurement documents to allow for assessment of suppliers in respect of slavery and human trafficking in our competitive procurement undertakings, which we hope to have in place by December 2018. In addition, we will be working with various business unit stakeholders to establish a plan to look at individual requirements to prevent slavery and trafficking within our different service types.

Staff Training

We have sought to raise awareness of the issue and risk of modern slavery within our Procurement, Third Party Technology, HR and Talent Acquisition departments. This year we plan to provide training to raise awareness across all arms of the business, which will be made available to employees through our intranet site. In addition, we will look to include information regarding the issues of modern slavery and human trafficking in our annual mandatory business conduct and ethics training.

This slavery and human trafficking statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and will be updated annually.

This statement is published on behalf of Open Text UK Limited and was approved by the board of directors of Open Text UK Limited on 29 January 2018.

Gordon A. Davies

Director

Executive Vice President, Chief Legal Officer and Corporate Development