

Modern Slavery and Human Trafficking Statement

For the financial year ended 30 June 2023 (the Reporting Year)

Our Organization

OpenText, The Information Company™, enables organizations to gain insight through market leading information management solutions, powered by OpenText Cloud Editions.

OpenText 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 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 around 24,100 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, 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

Our OpenText Zero-In Initiative is a new framework that encompasses all our ESG commitments and programs. Our framework is based on three pillars that focus on measurable, values-driven goals under the pillars of Zero Footprint, Zero Barriers and Zero Compromise.

Under this framework, our commitments are clear. We are zeroing in on what matters most while never compromising our culture, values, ethical business responsibilities or our mission to power and protect information.

Equity, Diversity, and Inclusion

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 BIPOC 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.

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 Reporting Year, we expanded the WIT program with the introduction of our WIT Affinity Group and WIT Mentoring Program. 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.

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.

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. 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. All employees, officers, directors, vendors, contractors and partners are required to conduct themselves in a manner consistent with our Code of Business Conduct and Ethics.

Our annual Code of Business Conduct and Ethics training covers human rights issues, is proactively communicated to employees and included in annual compliance training. Additional training is provided in specific regions and/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 business or in our supply chain include the following:

- Accommodation Policy
- Anti-Bribery and Anti-Corruption Policy
- Anti-Harassment and Anti-Discrimination Policy
- Background Check Policy
- Disciplinary Policy
- Equity, Diversity, and Inclusion Policy
- Grievance Procedure
- Health & Safety Corporate Statement
- Human Rights Statement
- Occupational Health and Safety Statement
- Privacy Policy for Employees
- Respect in the Workplace Policy
- Supplier Code of Conduct
- Whistleblower Policy
- Workplace Violence Prevention Policy

Corporate Citizenship

We understand that corporate citizenship is the foundation of a responsible business and giving due consideration to environmental, social, and governance factors can affect our company's long-term performance. When these three pillars 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.

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 ensure our customers are successful.

Our [Corporate Citizenship Report](#) reflects our commitment to transparency and our commitments to our stakeholders and society. 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
- Environment & Product Impact

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](#), [Human Rights Policy](#), [Sustainable and Ethical Procurement Policy](#), and [Environmental Policy](#) 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. For more information pertaining to doing business with OpenText, please visit our [OpenText Supplier Information Page](#).

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 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 Reporting Year, we completed modern slavery awareness training for our Procurement team. A statutory declaration was developed for signature by suppliers identified as medium or high-risk by geography and type of service, declaring that they will provide services in line with the Act and applicable legislation worldwide.

We continue to monitor and review our suppliers on an ongoing basis using a trusted supplier risk monitoring solution. 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, data protection and environmental matters) and financial/credit risks. As part of our review, we also receive corporate social responsibility ratings for our top tier suppliers. 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. 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 ratings, to assess their suppliers. OpenText had a Silver rating in the Reporting Year.

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 a number of mandatory compliance training courses on an annual basis 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 the next Reporting Year

We will continue to monitor against various government sanctions, violations (including labor, health and safety, ethical/regulatory, data protection 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.

The statutory declaration developed and completed in the Reporting Year will be sent out to our suppliers identified as medium or high-risk by geography and type of service for signature.

We will continue to deliver mandatory modern slavery awareness training to our Procurement team working with our suppliers. Mandatory training will be rolled out to the business units utilizing medium or high-risk services. We will continue to 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.

Slavery and human trafficking do not exist in our organization or, to the best of our knowledge, our supply chain.

This statement constitutes our slavery and human trafficking statement for the Reporting Year. It was approved by the board of directors of both GXS Limited and Open Text UK Limited on 5 January 2024.



Michael F. Acedo

Director

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

Executive Vice President, Chief Legal Officer and Corporate Secretary

For and on behalf of OpenText