

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 24,185 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 Open Text Corporation pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024 (the “Act”). Other OpenText group entities have made similar statements in the United Kingdom, Australia and Norway.

Our Supply Chain

OpenText is committed to fighting against forced labour and child labour. 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 (including forced labour or child labour) 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 and take action against human trafficking, child labour and forced labour in our business and supply chain. 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 (including forced labour and child labour) occurring in our business or in our supply chain include the following:

- Accommodation

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 (including in relation to forced labour and child labour). Our expectations apply to supplier environmental responsibility,

As there have been no known instances of forced labour and child labour at OpenText and the risk of such instances occurring is low, there has been no requirement in the Reporting Year to remediate any forced labour or child labour, nor to remediate any loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chain.

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 (including forced labour or child labour) 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 (including forced labour and child labour) 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. ur