

Modern Slavery and Human Trafficking Statement

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

Our Organisations

Our Policies and Commitments

We take very seriously our responsibilities to:

- x Act ethically and with integrity in every situation, and to support an ethical supply chain
- x Embrace diversity, inclusion, and respect in our workplace, and to empower our employees
- x Work with local organizations to support the communities in which we operate
- x 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 FRUH YDOXH V DQG WR PDLQWDLQ RXU FRPSDQ\¶V SRVLW 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. A

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 mitiga

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, 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 R Q D V X S S O L H U T V E X V L Q H V V P R G H O D Q G K R Z L W V V Z H O O D V W K H F R P S R V L W L R Q O R I R P A L S O S O L S S T I M A Z I R C R I A U F U D I N G 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

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 ensure awareness training is provided to all employees.