



FY2024 Modern Slavery & Human Trafficking Statement

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Introduction

OneTrust Technology Limited (“OneTrust”) was founded on the idea that people want to buy from, work for, and invest in companies that demonstrate positive impact on people and the planet. These societal shifts, spurred by new generations and amplified by modern technologies, redefine what good business looks like. We believe every company can thrive in this new era.

As a company, we are committed to responsible and transparent business practices that uphold and protect human rights, demonstrate respect for our people, local communities, and the environment. We have zero tolerance for modern slavery, and will always seek to identify, address, and mitigate any actual or potential human rights violation and modern slavery risks in our operations and supply chain. Beyond abiding by applicable laws and regulations, our goal is to implement best practices in these areas.

Section 54 of the UK Modern Slavery Act 2015 requires OneTrust to provide an annual statement on the risks of forced labor, slavery, servitude, debt bondage, child labor and human trafficking (“modern slavery”) in its business and supply chain and the action taken each financial year to address those risks. This statement is OneTrust’s Modern Slavery statement for the financial year ending on the 31st of January 2024.

Structure of OneTrust’s Operations and Supply Chains

OneTrust is a leading software-as-a-service provider, operationalizing trust for

its customers through its solutions that power privacy, security, ethics and compliance and ESG programmes. More than 14,000+ customers use OneTrust to build integrated programmes that comply with hundreds of the world’s privacy, security, regulatory and compliance laws, and acceptable standards. OneTrust is headquartered in London, England and operates as a subsidiary of OneTrust LLC in Atlanta, Georgia. The OneTrust group employs over 2000+ employees and has additional offices in Denver, New York, Paris, Munich, Bangalore, and Melbourne. Please click [here](#) to find out more about our business.

Our suppliers are the businesses that provide products and services that enable us to develop, market and sell our solutions and run our business. This includes data centers, professional service providers, business process outsourcing providers and hardware and software providers. Our supply chain also includes those that provide office services and supplies, such as office spaces, cleaning and maintenance and IT equipment.

Policies, Risk Assessment and Management

As a signatory and participant in the UN Global Compact, OneTrust believes in, supports, and promotes human rights in all forms of employment, equality and beyond. We are opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor and all other trafficking-related activities. We understand and acknowledge that the challenges posed by modern slavery require ongoing and proactive efforts within our company and our supply chain.

We remain committed to being vigilant and promoting awareness of modern slavery challenges within the organization and to its business or supply chain. OneTrust assesses its modern slavery risks to be generally low, particularly due to the sector in which we operate, the nature of our supply chain, and the values and policies to which all our employees are required to adhere to.

OneTrust's Code of Trust (ethics.onetrust.com) applies to all full- and part-time employees, and outlines the principles of honesty, integrity, confidentiality, and compliance that guide our business practices. All OneTrust employees are required to complete mandatory annual Code of Trust training, which uses real-life examples and scenarios to illustrate the policy. Topics include workplace behaviors, conflicts of interest, gifts, confidentiality, competition, and privacy. The training also reinforces how employees can report potential violations.

The needs and welfare of our people are important to us; therefore, we confirm that we have procedures in place to comply with relevant labor laws relating to employee terms and conditions, including pay and leave. In addition, we provide a robust and flexible benefits programme to support our employees' health, social and financial needs.

Our partners and third parties, including vendors and suppliers, represent us and our customers and are subject to our Global Procurement Policy and Supplier and Partner Code of Trust. We work with third parties that are as committed as we are to building trust with our customers. We conduct proper due

diligence to manage and reasonably mitigate any unacceptable risk with our third parties. This means, before we enter a relationship with third parties, we try to understand who they are, how they do business, and the risks they or the business create for OneTrust.

We expect our suppliers to share our values, but we recognise that while we consider our business to be low risk, there are still modern slavery risks in our supplier chain, particularly in the higher risk jurisdiction in which we operate. Based on the 2022 Global Slavery Index, we have identified this region to be India, where we have offices.

OneTrust has systems and processes in place for receiving and investigating potential violations of our policies. Our Global Speak-Up and Anti-Retaliation Policy sets and describes our approach to protecting individuals who report potential misconduct. The policy also provides detailed information on how both employees and third-parties can report wrongdoing. Consistent with our core values, we rely on our officers, directors, employees, independent contractors, and others who do business with us to bring to light good faith concerns regarding our business practices.

Our external Trustline helpline (<https://trustline.onetrustethics.com/>) is available for both internal and external parties to report concerns and provides the option of anonymous reporting where permissible under applicable laws. We encourage all our employees to be open and raise any genuine concerns, even if they turn out to be mistaken, knowing all reports are taken seriously, treated confidentially, thoroughly investigated,

and that any required corrective action will be taken.

Commitments and Plans for FY 2025

We acknowledge that prevention of modern slavery requires continuous efforts. Therefore, we are committed to enhancing our practices by introducing additional controls to mitigate and prevent supply chain risks and embed best practices within our business and supply chain.

During the 2025 Financial Year, we intend to take the following actions:

- Implement modern slavery training for employees in high-risk roles to empower them to identify risks and red flags.
- Implement a supply chain compliance programme that includes the following:
 - Conducting risk-based modern slavery due diligence on our direct suppliers, to

help us identify areas of risk prior to engaging in business relationships and to ensure selected suppliers share our values and commitments.

- Imposing contractual obligations on all suppliers, including obligations to comply with relevant laws (including any applicable modern slavery laws) and requirements to impose similar standards on their suppliers.

This statement has been read and approved by OneTrust's board of directors on the 30th day of January 2024.



Guido Torrini, Director
OneTrust Technology Limited