

# Hyland modern slavery and human trafficking statement

## Fiscal year 2024

Modern slavery and human trafficking is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Hyland has a zero-tolerance approach to modern slavery and human trafficking and is fully committed to preventing slavery and human trafficking in our corporate activities. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015 and the Commonwealth's Modern Slavery Act 2018.

Hyland only engages with resellers, partners, contractors and vendors who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with all human rights laws.

This statement sets out Hyland's actions to understand all potential modern slavery risks related to its business and to ensure steps are maintained to prevent slavery and human trafficking.

## Our business

Hyland is a global software organization headquartered in the United States of America in Westlake, Ohio. Hyland Software, Inc. has subsidiaries, branches or offices in the United States of America, the United Kingdom, Australia, France, Germany, India, Italy, Japan, Malta, Netherlands, New Zealand, Peru, Poland, Portugal, Singapore, South Africa, Spain, Switzerland, Brazil, Chile, Colombia, Mexico, and Canada. Collectively, Hyland has more than 20 office locations and more than 3,500 employees around the world.

Hyland's proprietary software products and related services are marketed and provided both directly and through an exclusive network of authorized resellers, strategic alliance partners, integration partners and original equipment manufacturers.

## Our supply chains and supplier adherence to our core values

Hyland's Sourcing Department is a team dedicated to managing all of Hyland's suppliers which provides the ability for Hyland to streamline and manage all supplier relationships in a fashion that ensures its suppliers are aligned with [Hyland's Core Values](#) and compliant with other applicable Hyland policies, such as Hyland's Code of Conduct and [Supply Chain Transparency Policy](#).

To date Hyland has not been made aware of any human trafficking or slavery activities within Hyland's supply chain. To the extent any such claimed activity is reported to or discovered by us, we would act immediately in accordance with our legal and moral obligations.

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our [Supply Chain Transparency Policy](#) reflects our commitment to acting ethically and with integrity in all our business relationships to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Hyland is constantly working on improving its processes to that effect.

New vendors shall agree to and certify compliance with all applicable human rights laws, environmental laws and worker safety laws, including all such laws related to slave labor and human trafficking such as the UK Modern Slavery Act and the Commonwealth's Modern Slavery Act 2018. New vendors must certify to follow Hyland requirements regarding Anti-Slavery and Human Trafficking. Hyland will not conduct business with any new vendors who refuse to comply.

## Our supply chains risks

As a software developer and provider of related services, Hyland has determined that Hyland and its subsidiaries' operations involved in the development of its software and related services are not exposed to as high of a supply chain risk of modern slavery and human trafficking as other industries, such as those engaged in the manufacturing of textiles, clothing, building materials, food, or who are engaged in agriculture, construction, mining, or other related industries, or rely on products or services that are derived from regions of the world with a high risk of modern slavery and human trafficking violations. Hyland also realizes that Hyland and its subsidiaries' risk exposure goes beyond the supply chain used specifically in the production of its software products and related services and includes all of its supply chain it uses on a day-to-day basis to run its business. Hyland understands that there is heightened risk based on the products or services provided by its suppliers, as well as the region or location of the supplier. Hyland's sourcing department identifies and documents the location of each of supplier and each supplier is identified in a specific supplier category based on the product or services it provides.

Hyland's supply chain includes:

- Vendors and services providers that provide technology, hardware, and software goods and services.
- Vendors that provide facilities maintenance and cleaning, including facilities remodeling and construction.
- Vendors and general suppliers of goods and services for day-to-day operations including office supplies and equipment, including professional and consulting services (such as legal, tax, travel, employee recruitment, etc.).



- Food and refreshment suppliers.
- Third-party contractors that provide professional services on behalf of Hyland and its subsidiaries.
- Vendors that provide marketing related materials, advertising, public relations and event services.
- Vendors that provide Hyland branded items for marketing purposes, such as clothing, personal use items and office supplies.
- Vendors that provide temporary employment related services.
- Third parties that Hyland contracts with to resell Hyland's products and services.

Hyland will be reviewing and assessing these various supply chains to further evaluate and identify the areas of heightened risk of modern slavery and human trafficking. These results will be used to further supplement Hyland's review, risk mitigation and management processes related to its suppliers. Hyland's goal is not only to mitigate such risks, but to use suppliers that share the same commitment as Hyland in promoting human rights and eradicating modern slavery and human trafficking.

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk with respect to suppliers, Hyland has a dedicated Sourcing Department, which among other things:

- Leverages, maintains and updates a vendor management system used to manage our vendor relationships, including our suppliers.
- Performs due diligence, as applicable, on new suppliers as part of Hyland's supplier pre-qualification process, which includes denied party screening and supplier completion of questionnaires relating to supplier corporate information, performance, and compliance to establish that suppliers adhere to Hyland's standards, comply with applicable laws, and are reputable and suitable suppliers.
- Requires vendor and suppliers to provide compliance certifications, including anti-slavery and human trafficking compliance certifications through Hyland's vendor management solution.
- Continually identifies and assesses potential risk areas when considering taking on new suppliers and regularly reviews our existing supply chains and policies to ensure and improve compliance.
- Continually updates and improves supply chain management processes to reduce risk.
- Includes language in contracts to address compliance with applicable laws, rules and regulations, where appropriate.
- Understands their obligations to speak-up and seek guidance regarding any misconduct or non-compliance by any employee or supplier and the various reporting avenues Hyland makes available to all of its employees to do so; including Hyland's Integrity Portal, where employees can submit their concerns via website or phone 24 hours a day 7 days a week and is managed by an independent third party.

## **Assessing the effectiveness of our actions**

Hyland is conscious that implementing policies and imposing compliance and reporting obligations on suppliers alone does not eradicate modern slavery risks from its operations and supply chains. As such, monitoring the effectiveness of our actions is key to assessing progress in addressing modern slavery risks.

For our supply chain partners, we will look at strengthening remediation actions and assessing effectiveness by engaging more closely with high-risk suppliers which are identified through our due diligence process. Further, our Speak-Up policy and use and availability of Hyland's Integrity Portal aims to enable staff members and other stakeholders to raise their concerns about behavior that may not comply with applicable standards or legal and regulatory requirements, while also allowing Hyland to log and track ethical violations and compare that to its due diligence results. The log report for this reporting period reflects Hyland received no reports of known or suspected slavery and human trafficking violations in its supply chain.

## Training

In addition to [Hyland's Core Values](#) and other Hyland policies, such as [Hyland's Code of Conduct](#) and [Supply Chain Transparency Policy](#), Hyland is continually assessing additional training/learning for our Sourcing Department and applicable employees specifically geared toward slavery and human trafficking to further educate and mitigate such risks in Hyland's supply chain.

## Consultation

Hyland's Sourcing Department oversees and manages our supply chain partners, including those of all of its subsidiaries, and in consultation with one another and applicable departments assisted in developing this statement. This involves senior managers from across the organization and in applicable roles working collaboratively and determining steps taken by, and experiences of, their respective entities during the reporting period to assess and address modern slavery risks, including if anything arose within its operations and supply chains during the reporting period.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the Commonwealth's Modern Slavery Act 2018, and constitutes Hyland's slavery and human trafficking statement for the financial year ending 2024.



Jitesh S. Ghai

Director, President & CEO