

# Loftware, Inc. Family of Companies Modern Slavery Statement

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) and is published on behalf of Loftware, Inc., parents Accel-KKR and the Riverside Partners, and their respective group companies.

This statement refers to the financial year ending December 31, 2023, and sets out the steps Loftware has taken to address modern slavery risks in our business and supply chains.

## **Loftware's structure, business and supply chains**

Loftware is the largest software labelling company in the world, headquartered in Portsmouth, New Hampshire, USA, with offices in the United Kingdom, Germany, Slovenia, China and Singapore.

The US represents Loftware's largest single commercial market, followed by Europe. We have over 517 employees across 6 countries, with approximately 89% based in Europe and North America.

Loftware's supply chains are complex and have significant scale. In 2023, Loftware spent approximately twenty million dollars (US\$20,000,000.00) with third parties that provide the Loftware Group with goods and services that are required to run our business, including IT, marketing and other agency support, travel, catering, consulting and facilities management services.

Loftware's Code of Conduct is the foundation of its company policies. It sets out how employees and ancillary workers should apply our values (customer focus, transparency, respect and integrity) and expectations (courage, accountability, development and teamwork) in their daily work and embeds respect for human rights and labour rights across the business. Loftware also has a separate Code of Conduct for its partners and customers, setting forth Loftware's expectations for conducting business with Loftware.

The Code(s) of Conduct are based on international standards, including the ILO core conventions, and prohibit any form of forced labour or child labour. They also make clear our expectation that no worker should pay for a job. – Our Code of Conduct and Quality Management System also define our approach to protecting and supporting individuals who work for Loftware, and report concerns of significant misconduct in good faith (including exploitative labour practices).

## **Assessment of modern slavery risk**

To assess modern slavery risk, we refer to external data sources (e.g., Alliance 8.7 Global Estimates of Modern Slavery <https://www.alliance87.org/> and the US Bureau of International Labor Affairs list of goods produced by child and forced labour <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> ).

Should Loftware identify any potential modern slavery or forced labour issues in its business or supply chain, we will investigate them immediately and rigorously, and take appropriate action to address any identified concerns. All employees are expected to report any concerns as a matter of priority and may do so on a confidential and anonymous basis.

Loftware believes that the risk of modern slavery in our directly employed workforce is low. This is attributed to our employees being largely highly educated and skilled, and undertaking work in controlled environments where there are established policies and processes. Loftware's exposure to the risk of modern slavery increases when Loftware engages with third parties.

Loftware identifies and prioritises suppliers in these areas for due diligence activities.

Loftware's approach to managing the risk of modern slavery forms part of our broader efforts to respect human rights. Loftware's Board of Managers oversees our approach to addressing human rights risks, including modern slavery.

**Overseeing third parties.** Loftware aims to work with third parties that share our values and work to the ethical and business standards expected by Loftware.

Loftware aims to drive continual improvement, however if we see no significant ongoing reduction in labour rights risk, where performance is poor, we may choose to suspend or terminate work with a third-party.

Loftware continues to engage with its suppliers to understand their operating and financial status and offer support if necessary. This includes, where appropriate and considered necessary or desirable, conducting supplier financial checks.

Loftware desires to maintain an open environment where people feel confident to raise concerns about possible breaches of our Code of Conduct or suspected violations of country laws and regulations. Anyone within or outside Loftware is able to raise issues or speak to an independent third party, confidentially or anonymously if they prefer. Loftware is committed to promptly investigating all reports of unethical, illegal or inappropriate activity. In 2023 there were no reports suggestive of modern slavery or human trafficking.

Loftware reviews the effectiveness of its modern slavery risk management program by assessing our, and our suppliers', ability to detect and mitigate modern slavery risk, investigation and analysis of reports of modern slavery and remediation actions taken in response and engaging regularly and collaborating with stakeholders. We recognise that as a complex and hidden issue, modern slavery requires more effort to uncover, particularly in lower tiers of supply. As Loftware continues its due diligence activities, we will consider the need for additional ways to assess the effectiveness of our actions.

Loftware operates and manages its subsidiaries through global policies, systems and processes that are designed to be consistently applied across the Group, including in the area of third party oversight, audit processes and contract governance.