

	Effective Date:	Last Review Date:
	December 1, 2018	November 1, 2021
	Approved By: Kyriba Board of Directors	
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Title: BELC 1.10 Anti-Slavery and Human Trafficking Policy		

## 1. Summary or Rationale

This Anti-Slavery and Human Trafficking Policy sets forth the policy of Kyriba Corp. and its affiliates and subsidiaries (collectively, “Kyriba” or the “Company”) to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. Kyriba is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. Kyriba will not tolerate or condone human trafficking or slavery in any part of our global organization. This policy is a key component of Kyriba’s overall Business Ethics and Legal Compliance Framework.

## 2. Scope

Line of Business	All
Function(s)	All
Locations	All
Legal Entities	All

## 3. Changes from Previous Version

This is the first version of this document.

## 4. Policy

We always work to the highest professional standards and comply with all laws and regulations applicable to our business. We expect the same high standards from those parties with whom we engage and we are committed to ensuring that there is no slavery or human trafficking in our supply chain. We work to embed throughout our operations a robust risk and compliance management framework to ensure we effectively analyze and manage the risks to our business. This includes analyzing the risk of inadvertently working with suppliers who do not share our commitment to anti-slavery and human trafficking.

Kyriba does not consider its own employees to be vulnerable from a slavery, forced labor or human trafficking point of view. Our supply chain broadly consists of goods and services provided by third parties in relation to our offices, such as stationery suppliers, caterers, office cleaners and suppliers of marketing merchandise. Although Kyriba also does not have an extensive range of local or international suppliers, we engage in the use of partners, subcontractors throughout our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery, forced labor and human trafficking does not take place anywhere in our business or supply chains. Kyriba employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Kyriba conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

### 4.1. Third Party Due Diligence

As partners, suppliers, subcontractors, contractors or vendors are partners in our business success, they are expected to comply with all local laws and regulations. We reserve the right to request information concerning, amongst other things, ethical conduct, health & safety, environmental, equality, anti-corruption and insurance protection to enable us to verify their commitment to our corporate values and company policies.



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#### 4.2. Integrity and Policy Compliance

Our global Code of Business Conduct includes an Anti-Slavery and Human Trafficking statement. We encourage our employees, partners, subcontractors, contractors, vendors, suppliers and clients to report in good faith any issues or concerns about potential violation of human rights, legal or regulatory requirements, and improper or unethical business practices such as fraud or bribery involving our Company or our employees. We maintain a whistleblower hotline, [kyriba.ethicspoint.com](http://kyriba.ethicspoint.com), which allows for anonymous reporting of improper behavior.

#### 4.3. Training

We provide training to raise awareness of modern slavery issues and to ensure that slavery, forced labor and human trafficking do not take place anywhere in our business or supply chains. Targeted training is being developed for personnel in roles relevant to our systems and controls.

### 5. Legal Obligations or Guidance

5.1. The Modern Slavery Act 2015 (section 54)

5.2. The California Transparency in Supply Chains Act (Section 1714.43)