

# Kyriba

## Anti- Slavery and Human Rights Policy

### Kyriba Corp.

**Executive Summary :** This Anti-Slavery and Human Rights 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 and sets out Kyriba's commitment to respect human rights. 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.

For questions regarding this Policy or possible violations please contact Legal Compliance at [compliance.legal@kyriba.com](mailto:compliance.legal@kyriba.com).

# Kyriba

Anti-Slavery and Human Rights Policy	Effective Date: November 20, 2018 Revision Date: December 2022 Last Reviewed Date: December 2022 Policy Owner: Global Compliance Approving Authority: Chief Legal Officer
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## Revision History Table

Version	Author	Date	Summary of Revisions
1.5	Director, Global, Ethics, Compliance, and Regulatory	December 2022	Title change; changes to the language and substance; added defined terms

# Kyriba

## Defined Terms

**The California Transparency in Supply Chains Act** - the Act requires covered parties to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains.

**Human rights** - rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.

**Modern Slavery** – also known as ‘slavery’, ‘child labor’ and/or ‘human-trafficking’ is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, 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.

**UK Modern Slavery Act 2015** – legislation that sets out a range of measures on how modern slavery and human trafficking should be dealt with in the UK. Section 54 of Act requires a commercial organization to prepare a slavery and human trafficking statement for each financial year of the organization if its total turnover is not less than an amount prescribed by the Secretary of State.

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## 1. Purpose

The Policy sets out Kyriba's commitment to a zero -tolerance approach to modern slavery and not engaging with any business who does not have the same approach. Kyriba is also committed to having a positive human rights impact by aligning its policies and procedures with international and voluntary requirements. This includes but is not limited to the UK Modern Slavery Act 2015 (section 54), The California Transparency in Supply Chains Act (Section 1714.43), and other emerging regulations. Kyriba maintains policies and procedures designed to identify, prevent, mitigate, and account for how it addresses any potential adverse human rights impacts. Kyriba's commitment to anti-slavery and human rights is also reflected in its [Environmental, Social and Governance](#) ("ESG") Program.

## 2. Policy Scope

This Policy applies to Kyriba Corp., its subsidiaries, and affiliates, and each of its officers, directors, and employees; it is to be observed and strictly complied with in every aspect of Kyriba's business.

## 3. Policy

Kyriba and its employees 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 modern 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 limiting the risk of modern slavery.

Kyriba does not consider its own employees to be at high risk from a modern slavery, forced labor or human trafficking point of view. Further Kyriba operates in a sector which is relatively low risk of modern slavery, forced labor and human trafficking existing within the business or within its supply chain. Kyriba's 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 and 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 avoids complicity in any practice that constitutes trafficking in persons or modern slavery. It is through robust Third-Party Risk Management procedures, Know Your Customer procedures, Human Resources practices, and Procurement procedures that Kyriba ensures compliance with this Policy.

## 4. Third Party Risk Management & Due Diligence

Kyriba's partners, suppliers, subcontractors, contractors, and vendors are expected to comply with all local laws and regulations, including the UK Modern Slavery Act and California Transparency in Supply Chains Act. Thus, Kyriba maintains a robust third-party due diligence program that aims to reduce risk, ensure compliance, and drive measurable business improvement to create long-term sustainable value for the company. In addition to our Know-Your-Customer practices, our onboarding screening for all parties we do business with, and Kyriba's continuous monitoring of all parties, Kyriba reserves the right to request information concerning, amongst other things, ethical conduct, human rights, 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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## 5. Procurement

Corporate integrity, responsible product sourcing, and the safety of workers across the global supply chain are of vital importance to Kyriba. These principles apply to all aspects of Kyriba's business, and encompass all manufacturers, distributors, vendors, and other suppliers. Kyriba's vendors are evaluated through our Security and Compliance teams in conjunction with the Third-Party Risk Management & Due Diligence before committing to a purchase.

## 6. Reporting Obligations and Guidance

Our global Code of Business Conduct includes an Anti-Slavery and Human Rights statement. We encourage and expect 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. [Kyriba's Ethics Hotline](#) allows for anonymous reporting of improper behavior. Reports can be made by contacting Legal Compliance at [compliance.legal@kyriba.com](mailto:compliance.legal@kyriba.com)

## 7. Approval and Responsible Party

This Policy is approved by the Chief Legal Officer and the Audit, Finance, and Risk Committee ("AFRC"). Legal Compliance initiates a review of this policy on an annual basis.

## 8. Related Policies

All policies applicable to internal Kyriba personnel are located on the [Compliance Insider Page](#).

- Kyriba Code of Business Conduct
- Kyriba Global Sanctions Export Policy
- Kyriba Gift and Entertainment Policy
- Kyriba Anti -Money Laundering Policy
- Kyriba Conflict of Interest Policy
- Kyriba Anti-Bribery and Anti- Corruption Policy
- Kyriba KCY and Third-Party Due Diligence Policy
- Kyriba Whistleblower Policy

External parties can view Kyriba's public-facing policies here: [Kyriba Policies](#).