



Smarsh

Anti-Slavery & Human Trafficking Policy

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Policy Overview

Purpose

The purpose of this policy is to raise awareness, address, and prevent modern slavery in the Smarsh supply chain, and comply with the law in the jurisdictions Smarsh operates.

Scope

This Policy applies to all persons working for Smarsh or on our behalf, globally.

Responsibility

It is the responsibility of Business Operations & Integrations to ensure:

- The implementation of this policy.
- Ethical obligations are communicated and that those in scope comply.
- The annual report is received.

It is the responsibility of Procurement to ensure:

- This program is continually developed & reviewed to ensure its effectiveness in countering modern slavery.
- Availability as first point of contact for information, customer & prospect due diligence, advice, or complaints.

It is the responsibility of Management *at all levels* to ensure:

- Those reporting to them understand and comply with this Policy.

Definitions

The definition and meanings of Modern Slavery and Human Trafficking are internationally recognized. The UK Modern Slavery Act 2015 covers four defined activities:

- Slavery: Exercising powers of ownership over a person
- Servitude: The obligation to provide services is imposed using coercion.
- Forced or compulsory labor: Work or services are exacted from a person under the menace of any penalty for which the person has not offered themselves voluntarily.
- Human trafficking: Arranging or facilitating the travel of another person with a view to their exploitation.

The Policy

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms such as slavery, servitude, forced or compulsory labor, child labor and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Smarsh has a zero-tolerance approach to modern slavery.

Smarsh and its group companies ("Smarsh") are committed to acting ethically and with integrity in all its business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

Smarsh is committed to ensuring there is transparency in our own business and to conducting due diligence of our suppliers to decrease the risk of modern slavery in our supply chains.

This policy is publicly available on our website consistent with our disclosure obligations under the Modern Slavery Act 2015 (the "Act"). We expect the same high standards from all our contractors, suppliers, and other business partners.



Compliance with this Policy

You must ensure that you read, understand, and comply with this Policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for or on behalf of Smarsh. You are required to avoid any activity that might constitute, lead to, or suggest a breach of this Policy.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any of our supply chains constitutes any form of modern slavery, please raise this as soon as possible.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains, or those of any supplier, at the earliest possible stage in accordance with our Compliant Procedure in the Smarsh Employee Handbook. If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any of our supply chains constitutes any form of modern slavery, please raise this as soon as possible.

If issues are identified in relation to modern slavery, these should be immediately reported to your manager, the Legal department, or by using a dedicated confidential Anonymous Ethics Violation Reporting Hotline:

Anonymous Ethics Violation Reporting Hotline: 1-844-379-4454 or online reporting:
<https://smarsh.ethicaladvocate.com/>

No employee will be threatened or retaliated against for reporting, in good faith, a violation of this policy. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied and you are an employee, you should raise it formally by contacting your HR Business Partner.

Policy Communication & Awareness

Our zero-tolerance approach to modern slavery should be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Awareness of this policy is obligatory for all employees and suppliers. Our policy on modern slavery shall be included in the Smarsh Code of Conduct and Supplier Code of Conduct.

Policy Breaches

Persons or entities that breach this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals, entities and organizations working on our behalf if they breach this policy.