

## Modern Slavery Statement

### Introduction

Avetta, LLC, and its affiliates and subsidiaries (“**Avetta**,” “**Group**,” or “**we**”) are committed to continuous improvement of our practices to combat slavery and human trafficking. This statement outlines the key activities we undertook during the financial year ending on 31 December 2025 to address and mitigate the risks of modern slavery within our organisation and across our supply chains.

As a global business with offices in major regions worldwide, we recognise that modern slavery and human trafficking are pervasive global issues that can affect our operations, workforce, and customers. Avetta’s leadership and stakeholders are committed to upholding the highest standards of ethical business conduct and transparency. Our senior management team takes full responsibility for overseeing the actions outlined in this statement and ensuring that appropriate resources and governance are in place to support our efforts to prevent modern slavery and human trafficking.

This statement is prepared in accordance with the requirements of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth).

### Reporting entity

The reporting entity for this statement is:

Avetta, LLC  
3300 North Triumph Blvd. Suite 800  
Lehi UT 84043  
United States

Avetta, LLC confirms that it meets the reporting thresholds under both the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth). Other entities of the Group currently do not meet the reporting requirements.

### Organisation’s structure

Avetta, LLC, a limited liability company formed in the State of Delaware, United States, is the parent company of the Group. The Group is headquartered in the United States and operates through strategically located offices across key global regions, employing over 900 employees.

Other entities within the Group include the following:

<b><u>Entity Name</u></b>	<b><u>Location</u></b>
Avetta Do Brasil Tecnologia da Informação Ltda.	Brazil
Avetta India Private Limited	India
Avetta Limited	United Kingdom
Avetta Pty Ltd.	Australia
Industry Skills Limited	New Zealand
Pegasus Management Pty Ltd.	Australia

## **Our business**

Avetta provides supply chain risk management solutions through a software-as-a-service (“SaaS”) platform to customers in over 120 countries. Our customers include (i) businesses that engage or qualify suppliers through our platform, and (ii) businesses that provide or seek to provide contractor services to one or more clients. We help clients ensure their connected suppliers are qualified, licensed, and safe by vetting health and safety practices and providing insights into financial viability, cybersecurity, sustainability, workforce compliance, and other key risk areas. Suppliers, in turn, use our platform to manage the completion of client requirements and gain exposure to potential client companies.

Our services support customers across a wide range of industries, including telecommunications, construction, manufacturing, mining, facilities management, high tech, and energy.

To learn more about our business, please visit <https://www.avetta.com/>.

## **Our supply chains and modern slavery risk**

As a SaaS company, our direct workforce consists of skilled professionals across technology, engineering, customer support, and corporate functions, working in either office-based or remote environments. These roles are typically highly skilled and covered by formal employment arrangements. As such, we consider the risk of modern slavery within our direct operations to be low.

Our supply chains are relatively simple and straightforward, primarily supporting our day-to-day operations and the development, maintenance, and delivery of our cloud-based software solutions. These include office supplies, professional services, IT infrastructure and software, leased office space, and business travel.

While our direct procurement activities are limited in complexity, we recognise that risks may exist in our extended supply chain, particularly in areas such as (i) IT hardware procurement, including laptops and networking equipment, which may involve complex, global supply chains with manufacturing operations in higher-risk countries; (ii) facilities and office services, such as cleaning, catering, or security, where temporary or low-skilled labour may be used; and (iii) outsourced or offshore services, including development, support, or data processing services, particularly in jurisdictions where labour laws and enforcement may vary.

## **Our policies on slavery and initiatives**

We maintain appropriate policies that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. These policies are regularly reviewed and updated to remain effective and aligned with evolving best practices.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all of our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

Our Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It sets out guiding principles on professional conduct, requiring all employees, officers, and directors to act with integrity and uphold the highest ethical standards in all aspects of their work.

Our Code of Conduct for Vendors and Service Providers defines Avetta's expectations for third-party vendors and service providers. It ensures that those performing services on our behalf adhere to our ethical standards.

Our Procurement Policy further reinforces our commitment to ethical and responsible sourcing. It outlines employee responsibilities and our risk-based approach for vendor due diligence, incorporating insights from the 'Global Estimates of Modern Slavery: Forced Labour and Forced Marriage,' a report jointly developed by the International Labour Organization, Walk Free, and the International Organization for Migration.

In 2019, we became a signatory to the United Nations Global Compact, integrating the ten business principles into our corporate culture, further strengthening our commitment to the provision of an ethical and fair work environment for all our global operations.

We are also a member of the United Kingdom Gangmaster Labour Abuse Authority Construction Protocol, which has been created to actively prevent modern slavery within the UK construction supply chain. We actively support this government-led effort and promote its mission wherever possible to help combat this serious issue.

### **Due diligence process**

Avetta is committed to identifying and mitigating the risk of modern slavery and human trafficking within its own operations and supply chains. Our due diligence process ensures that we engage only with vendors and partners who uphold ethical labour practices and comply with relevant legislation.

Internally, we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistleblowers

We conduct risk-based assessments of our suppliers, prioritising those operating in high-risk regions or sectors. Where necessary, we request additional documentation or conduct further investigations. Non-compliant suppliers may be subject to corrective action or removal from our network.

### **Recruitment practice**

Avetta is committed to fair, transparent, and ethical recruitment practices that uphold the rights and dignity of all individuals. Our recruitment policies are endorsed at the highest levels of the company and are designed to promote equal opportunity, diversity, and a discrimination-free working environment.

We operate a robust recruitment process that includes eligibility-to-work checks in accordance with applicable government regulations, including those of the United Kingdom. These checks help prevent human trafficking and ensure that no individual is employed against their will.

Where external recruitment agencies are used, they are required to comply with all relevant legislation in their country of operation and adhere to Avetta's codes of practice. We do not charge any fees to individuals seeking employment with Avetta, nor do we permit our recruitment partners to do so.

We recognise that modern slavery and human trafficking are serious violations of human rights. All individuals working for Avetta do so voluntarily and of their own free will, in alignment with our core values of freedom, fairness, and respect.

### **Training and communication**

We are committed to conducting all business transactions in an ethical and transparent manner. We recognise that in some parts of the world, cultural norms may differ, and unethical business practices may be more common or even socially accepted. However, we remain unwavering in our commitment to our core values and business ethos.

To reinforce this commitment, all members of our global workforce receive training and guidance on our business policies and the standards of conduct expected in all professional relationships. Our annual training programme covers a comprehensive range of business-specific topics, which employees are required to review, understand, and formally acknowledge. Additionally, employees in roles that may expose them to risks related to modern slavery or human trafficking receive targeted training to help them identify, prevent, and respond to such issues effectively.

We have also implemented internal procedures to ensure that concerns related to modern slavery and human trafficking are addressed appropriately. All personnel are encouraged to report any concerns regarding business conduct directly to any member of the executive team. Furthermore, employees involved in procurement are expected to fully understand and comply with our Procurement Policy and Code of Conduct for Vendors and Service Providers, ensuring that no goods or services are sourced from suppliers linked to unethical practices.

### **Our effectiveness in combating slavery**

We are engaged in an ongoing assessment of both the nature and extent of our exposure to the risk of modern slavery and the effectiveness of our efforts to manage this exposure. We continually review areas of our supply chain that may be at higher risk.

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains:

- The number and type of issues identified through screening suppliers and subcontractors
- The number of reported breaches in the past year
- The number or percentage of staff trained
- The instances of remedial action being needed

We manage the risks to our organisation by maintaining high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate, prioritising areas with a higher likelihood of such issues.

### **Confirmation of intent**

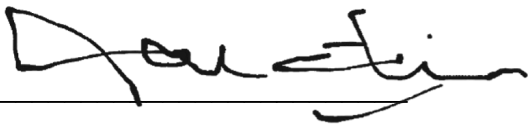
The senior management team within Avetta is committed to ensuring that there is no modern slavery or human trafficking within our global business or our supply chain. We demonstrate this commitment by continuously enhancing our due diligence and governance practices. As part of our broader

sustainability efforts, we have appointed key personnel to lead our global strategy and embed responsible business practices into our daily operations.

### **Consultation process**

We have acted in consultation with the entities within the Group in preparing this statement. Each of the entities has reviewed this statement.

This statement was approved by the principal governing body of Avetta, LLC on 18 June 2026.

A handwritten signature in black ink, appearing to read "Arshad Matin", written over a horizontal line.

Arshad Matin

Chief Executive Officer