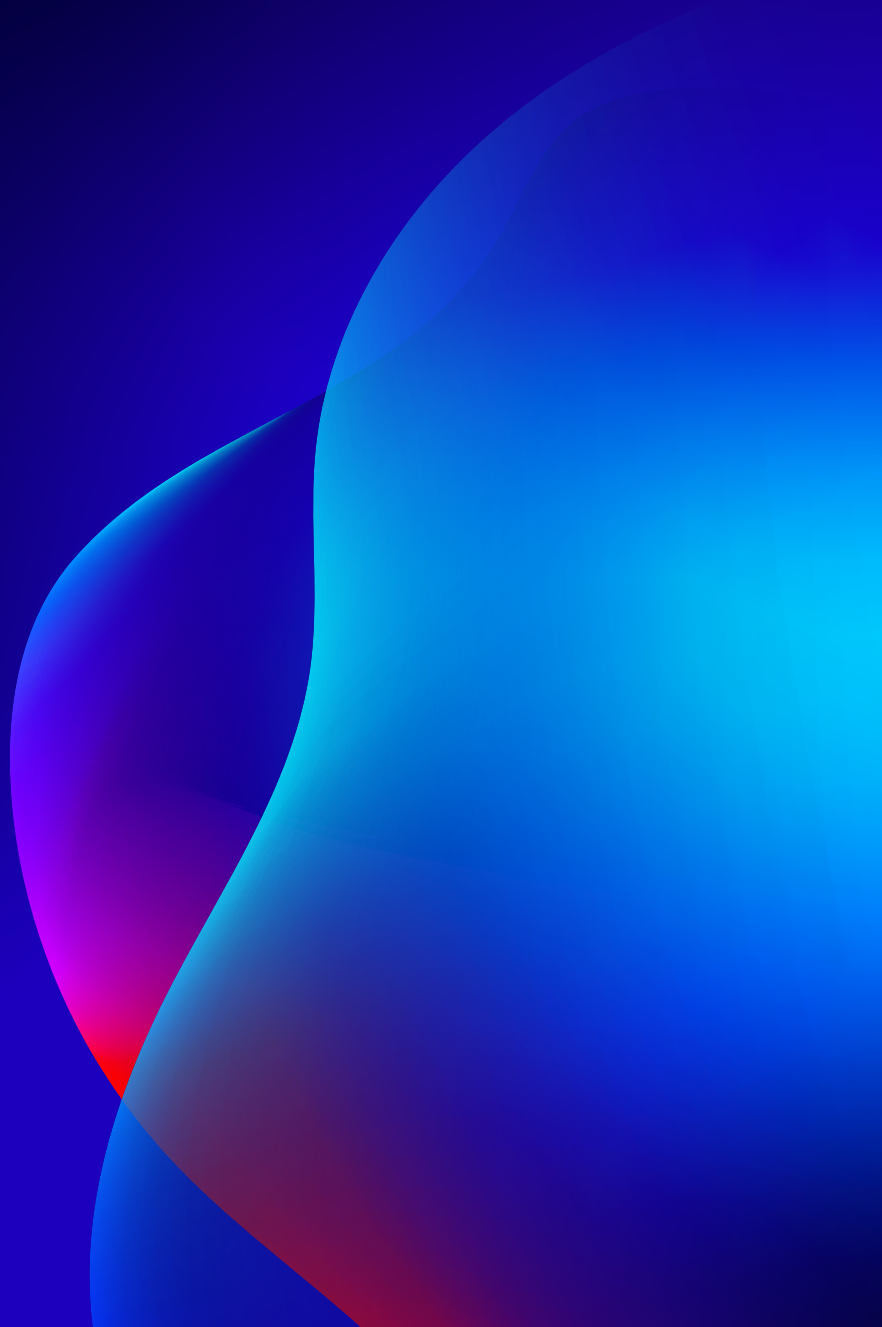
Liferay®

Modern Slavery and Human Trafficking Statement



This statement provides information regarding certain anti-slavery and anti-human trafficking policies and practices applicable to Liferay's business and affiliates.

I. Introduction

This statement sets out Liferay's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chain. This statement relates to actions and activities taken by Liferay International Limited and their respective affiliates as outlined in section II.a. during the financial year January 1st 2024 to December 31st 2024.

As part of the IT industry, we recognize that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

Our organization is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

II. Organizational Structure and Supply Chains

Liferay is an open-source software company located in Ireland with affiliates in several countries around the globe. Its main business is to provide subscription services to its customers, which includes software access deployed through various consumption model, such as on premise, PaaS, and SaaS, and maintenance, support services and legal warranties. Liferay prides itself of its ethical conduct, reflected and affirmed in its Code of Business Conduct and Ethics. Liferay also dedicates a significant part of its profits to fund Liferay Foundation, a not-for profit organization that helps to fund sustainable activities around the globe, involving Liferay's own staff and third parties.

As a software company, almost all Liferay's workforce is formed by highly qualified employees located in several parts of the world. By the nature of its business activities, it is not feasible that minors or other workers in slavery conditions perform any part of the service that Liferay provides to its customers.

Based on its business activities, Liferay's supply chain for its service offerings that include software development, maintenance, support, implementation, training and consulting services and legal warranties is formed by companies that provide high-

quality services and it is highly unlikely that as part of the provision of these high-quality services to Liferay which requires a high level of specialization of workforce, Liferay's suppliers engage in activities that breach anti-slavery legislation around the globe. In addition to the type of services that Liferay may procure from its suppliers, the suppliers themselves are mostly larger, international, and compliance-driven companies committed to human rights and anti-slavery legislation.

A. Countries of Operation and Supply

We currently operate in the following countries:

Affiliate Name	Business Address
Liferay Africa S.A.R.L.	Liferay Africa S.A.R.L.
Liferay Australia Pty. Ltd.	Level 18, 219-227 Elizabeth Street, Sydney NSW 2000, Australia
Liferay Benelux B.V.	Hel Groen Oord Work & Play, Willem de Zwijgerlaan 2a, 2316 GB Leiden, The Netherlands
Liferay Canada Inc.	15 Allstate Parkway, Suite 670, Markham, ON L3R 5B4, Canada
Liferay Chile	Avda Nueva Tajamar, n° 481, adepto 908, Comuna Las Condes, City: Santiago, Chile
Liferay Dalian Software Co., Ltd.	Room 601, Floor 25, No. 7 Huoju Road, High-tech Zone, Dalian116023, P.R. China
Liferay France SAS	29 rue Taitbout, 75009 Paris, France
Liferay GmbH	Kölner Straße 3, 65760 Eschborn (Taunus), Germany
Liferay Hungary Kft	1138 Budapest, Madarász Viktor utca 47. a-b. ép., Hungary

Liferay, Inc.	1400 Montefino Avenue, Diamond Bar, 91765, California, USA
Liferay India Pvt. Ltd.	No-216, Alfa Center, Double Road, Chinappa Garden, Benson Town, Bangalore, 560046, India
Liferay International Limited	100 Mount Street Lower, D02TY46, Dublin 2, Ireland
Liferay Italy SRL	via Torri Bianche 9 - Palazzo Quercia - 20871 Vimercate (MB), Italy
Liferay Japan KK	1F Faveur Ebisu, 1-26-7 Ebisu Nishi, Shibuya-ku. Tokyo 150-0021, Japan
Liferay Latin America Ltda	Rua Alfândega, Nº 35, Sala 0401 - Paço Alfândega Recife/PE, Brazil CEP 50.030-030
Liferay Middle East FZ LLC	Building 8, office 207, Dubai Media City, Dubai, UAE
Liferay Nordic Oy	Eteläranta 12, 00130 Helsinki, Finland
Liferay Singapore Pte Ltd	302 Orchard Road #07-03 Tong Building Singapore 238862
Liferay S.L.U.	Paseo de la Castellana, 280 Planta 1ª. Módulo B 28046 - Madrid Spain
Liferay UK	C/O Corporation Service Company UK Limited, 5 Churchill Place, 10th Floor, London, United Kingdom, E14 5HU

B. Due Diligence

While Liferay operates in several countries, due to the nature of its business, its main suppliers are international and compliance-driven companies based in the U.S.A., where there is established anti-slavery legislation and enforcement. At the same time, whenever possible, Liferay will contract from local suppliers to

positively impact local economies it serves. Liferay´s service offerings require a high level of specialization of its and its suppliers' workforce which reduces the risk of engagement in activities that breach anti-slavery legislation. Whether contracting globally or locally, Liferay's activities are governed by its Code of Business Conduct and Ethics, which demands respect for human rights and prohibits any involuntary work relationships.

In order to identify activities that would create a material risk that Liferay, directly or indirectly through its suppliers, would engage in conduct in connection with Liferay's business that would violate human rights, including any activity that include slavery or human trafficking, Liferay pursues a risk-adjusted approach based on a number of risk-related contextual factors.

In this context Liferay pursues a tiered approach. Liferay first reviews the countries and the sectors it and its relevant suppliers operate in with respect to Liferay services and would apply greater scrutiny to those activities that take place in a country and/or sector that has high modern slavery risks based on factors such as history of slavery, lack of law and enforcement or lack of basic protection for specific groups such as for example minorities, women, or children. To the extent Liferay identifies activities in such countries or sectors it will review these activities as a second step with respect to the workforce engaged in these activities and would apply greater scrutiny to activities involving the presence of migrant worker, refugees, low skilled workers, women, or temporary and agency workers. To the extent the workforce would be sourced from a third party (e.g. outsourcing or agency) Liferay would in a third step review the relationship with respect to any red flags such as allegations of poor practices against the third party, abnormally low contract costs, lack of transparency etc.

C. High-Risk Activities

As stated above, Liferay has determined that for the relevant statement period identified above its own business activities and supply chain does not include high-risk activities for slavery or human trafficking, based on subscription services business and the sector it operates in, the location and in particular the high level of specialization of its own and its supplier's workforce.

D. Responsibility, Policies, Training and Awareness

As expressed in Liferay's Code of Business Conduct and Ethics, compliance with laws and regulations including human rights such as no slavery is the responsibility of the entire staff. As a growing company, Liferay is additionally creating specific roles and responsibilities with a focus on ensuring human rights and compliance with applicable law. This includes established Human Resources and Legal departments with compliance handbooks, policies and trainings focused on

continuous enhancement of its compliance efforts. Both of these departments have representatives at the company's leadership level to ensure their goals and recommendations guide strategic company decisions.

The Liferay Code of Business Conduct and Ethics is periodically reviewed and updated as needed, also in light of the risk-adjusted approach and contextual factors set forth above and Liferay benchmarks the industry leaders and consults experts in the respective subject matter, in order to align with the best practice in the industry and adhere to Liferay culture.

Liferay's Code of Business Conduct and Ethics also requires investigation of any alleged violations and remediation of any confirmed violations or deficiencies.

Anti-slavery and prevention of human trafficking is part of our global Code of Business Conduct and Ethics training which each employee has to undergo as part of our onboarding process and periodically thereafter.

Certificates of the Code of Business Conduct and Ethics acknowledgment are stored within Human Resources employee files.

E. Performance Indicators

Based on the above compliance efforts Liferay measures its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains based on the following performance indicators:

- Requiring all staff to acknowledge its obligation to comply with human rights and not to engage in or tolerate any use of forced or involuntary labor of any type, including support for any form of human trafficking or involuntary labor, as part of their onboarding training and periodically thereafter;
- Requiring all staff to have completed training on "No forced or involuntary work" as part of their onboarding training and periodically thereafter;
- Remedial and risk-mitigating measures where due diligence reveals violations or material risk of such violations (for example additional due diligence, training of staff or termination of contract).

III. Review

This Statement describes the activities that Liferay International Limited and its affiliates are undertaking to prevent slavery and human trafficking in our business operations and supply chains.



Brian Chan
Liferay International Limited



Liferay helps organizations build for the future by enabling them to create, manage, and scale powerful solutions on the world's most flexible Digital Experience Platform (DXP). Trusted globally by over a thousand companies spanning multiple industries, Liferay's open-source DXP facilitates the development of marketing and commerce websites, customer portals, intranets, and more. Learn how we can use technology to change the world together at liferay.com.

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