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Harvey

FINANCIAL YEAR ENDED 31 DECEMBER 2025

UK Modern Slavery Act Transparency Statement

Harvey is committed to operating ethically and responsibly, treating everyone with dignity, and respecting the rights of all individuals. Harvey does not tolerate any form of slavery or human trafficking in our business or supply chains, and we are committed to respecting human rights, including the principles recognized in international human rights standards such as the Universal Declaration of Human Rights.

In accordance with the UK Modern Slavery Act 2015, this statement, which covers our financial year ended 31 December 2025, describes the policies and practices we have in place to help ensure that slavery and human trafficking are not taking place in our business operations or supply chains. As used in this statement, "Harvey" refers collectively to Harvey AI Corporation and its subsidiaries, including Harvey AI UK Ltd.

Our business and structure

Harvey is a software-as-a-service (SaaS) platform that provides artificial intelligence solutions designed for legal and professional work. Founded in 2022 and headquartered in San Francisco, California, Harvey serves law firms, corporate legal departments, financial institutions, and other professional services organizations across more than 85 countries as of today. Our platform includes AI-powered products for legal assistance, document analysis and management, research, and workflow automation, delivered securely over the internet.

Harvey AI Corporation is incorporated in Delaware. Its subsidiaries, which are wholly owned, include Harvey AI UK Ltd. in the United Kingdom, together with entities in Canada, Australia, Ireland, India, Singapore, and Japan. We maintain offices in a number of locations worldwide, including San Francisco, New York, Toronto, London, and Sydney. We generate revenue primarily through subscriptions to our software platform; we do not sell physical goods.

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Our supply chains

Harvey is not a manufacturer, and we do not purchase raw materials or commodities for our business operations. The goods and services we typically procure are those necessary to operate a technology company at scale, including cloud computing and hosting services, artificial intelligence model and infrastructure services, software licenses, payment processing, professional services (such as legal, accounting, and consulting services), recruiting services, IT hardware, marketing and advertising services (including events and branded merchandise), and all services relating to our leased offices and facilities (such as cleaning, security, food and beverage services, and facilities management). Some of our suppliers are global and service the entire company; others are local or regional and fulfill specific needs for our offices around the world.

Because our spend is concentrated in cloud infrastructure, enterprise software, and professional services obtained from established providers, predominantly in lower-risk jurisdictions, we consider the inherent risk of modern slavery and human trafficking in our direct supply chain to be low. Our most significant suppliers are large, well-established technology providers, including our primary cloud hosting provider, Microsoft Azure, and the foundation model providers that support our platform, such as Anthropic, Google, and OpenAI. Harvey maintains an up-to-date list of the subprocessors that support its platform, which is publicly available at harvey.ai/legal/subprocessors. We recognize, however, that risk can exist in lower tiers of any technology supply chain, including in the manufacture of hardware and marketing materials like branded swag, as well as in outsourced facilities, cleaning, security, and staffing services, and we take a risk-based approach to identifying and managing that exposure.

We expect everyone who provides goods or services to Harvey, including our suppliers, contractors, and their agents, to respect human rights, hold themselves to high ethical standards, and comply with applicable law in their own business practices and supply chains. Our standard agreements with suppliers require compliance with all applicable laws in the performance of the agreement.

Assessing and managing risk

Harvey takes a risk-based approach to our third-party risk. Under our Third-Party / Vendor Security Policy, we conduct due diligence before onboarding suppliers who access our confidential data or systems, maintain written agreements that set out each supplier's responsibilities, and review supplier performance on a periodic basis. Our standard vendor security terms require suppliers to maintain human resources practices that include background checks for personnel who access Harvey confidential information. We also screen certain counterparties against sanctions and restricted-country requirements as part of our trade-compliance controls.

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Our platform and acceptable use

Harvey provides an enterprise platform to vetted business customers. Unlike a consumer content or advertising platform, Harvey does not host public user-generated content and does not operate an advertising or consumer marketplace, which limits the platform-based exploitation risks associated with such services. Access to Harvey is subject to customer onboarding controls, and we maintain restricted-country and sanctions screening, together with an internal AI acceptable-use framework, to help ensure our platform is provisioned and used responsibly and lawfully.

Our corporate policies

Harvey's Code of Business Conduct and Ethics (the "Code") applies to all Harvey employees, officers, directors, and contingent workers, consultants, and contractors who work for or on behalf of Harvey. The Code affirms that Harvey complies with all applicable laws and respects internationally recognized human rights where we operate, and expects the same of our partners. It states that all labor must be voluntary and that we do not engage in child labor; forced, bonded, or indentured labor; involuntary prison labor; slavery; trafficking of persons; or physical punishment, and that we pay applicable legal wages under humane conditions. The Code also encourages everyone to report any concerns, including concerns about unethical or illegal behavior, and prohibits retaliation against good-faith reporters. Harvey personnel are trained on the Code.

Harvey maintains additional policies that reflect our commitment to protecting human rights in our business, including our Non-Discrimination and Anti-Harassment Policy, our UK Employee Handbook (which reflects UK legal requirements, including the Equality Act 2010 and our whistleblowing procedures), our Third-Party / Vendor Security Policy, our Anti-Bribery and Anti-Corruption Policy, and our Restricted Countries and export-control and sanctions controls.

Training and reporting

Harvey provides compliance training to our personnel, including training on our Code of Business Conduct and Ethics, and we continue to develop and expand our training program as our business grows. Harvey maintains confidential reporting channels, including an anonymous Ethics Hotline, that are available to employees and, where appropriate, to contractors, suppliers, and other third parties to report conduct that might violate Harvey's policies or the law, including concerns about human rights, slavery, or human trafficking in our supply chains or business operations. These reporting channels are described in our Code of Business Conduct and Ethics. Harvey prohibits retaliation against anyone who raises a concern in good faith.

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Governance and continuous improvement

Responsibility for Harvey's modern slavery and human rights efforts is shared across our Legal, Compliance, and Responsible Business functions, which are subject to Board-level oversight.

Operational responsibility for third-party due diligence sits with our Legal, Compliance, and Procurement functions, working together with Responsible Business. Harvey's compliance and ethics program is developing in a deliberate, risk-based way appropriate to our size and risk profile. Over the coming year we intend to issue and operationalize a Supplier Code of Conduct, continue to strengthen risk-based third-party due diligence and screening, and review this statement annually.

Harvey publishes this statement, together with related governance, privacy, and compliance information, through its public Legal Information page at https://www.harvey.ai/legal.

Approval and signature

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Harvey's slavery and human trafficking statement for the financial year ended 31 December 2025. It was approved by the board of directors of Harvey AI UK Ltd. and is signed by a director for and on behalf of Harvey AI UK Ltd.

Signed by:
Vineet Shahani
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Vineet Shahani

Director, Harvey AI UK Ltd.

October 22, 2026