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MODERN SLAVERY ACT STATEMENT

Policy Statement

We, Recurly, Inc., and our group companies, including Recurly UK Limited are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. We take a zero-tolerance approach to Modern Slavery and Human Trafficking, whether under UK law or under the law of any foreign country. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter Modern Slavery and Human Trafficking.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

Organisation's structure

We are a Subscription Management Software and Recurring Billing Platform compatible with leading ERP, CRM and payment gateways in the Information Technology sector. We are the parent company of Recurly UK. We work to monitor and address any Modern Slavery and Human Trafficking risks as required across all our operations.

Our business

Our business is organized into six business units – Customer, Engineering, General & Administration, Marketing, Product and Sales.

Our supply chains

As we are a software as a service provider, we have limited supply chain requirements or providers, and these relate more to support functions or facilities providers.

Our policies on slavery and human trafficking

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

Recurly UK Limited
One St Peter's Square
Manchester UK M2 3DE

recurly.com

+1.844.732.8759

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Due diligence processes for slavery and human trafficking

We are putting in place systems to:

- Identify and assess potential risk areas in our business and supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.
- Protect whistle blowers.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our business, supply chain and contractors comply with our values and ethics we have an Ethics team which consists of representatives from the following departments at Recurly:

- Compliance
- Human resources
- Legal

Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, our staff is being made aware of the risks and process of how to raise a concern when they see it.

Our effectiveness in combating slavery and human trafficking

Given the nature of our activities and relationships with suppliers or external providers, there is limited scope to effectively measure and report on our effectiveness in a relevant manner. However, we are taking the appropriate steps to minimise the potential for Modern Slavery and human trafficking and will continue to monitor and adapt our approach where activities develop or change in the future.

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This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes [our **OR** our Group's] slavery and human trafficking statement for the financial year ending December 31, 2024. It was approved by the board on July 4, 2024.

[NAME AND SIGNATURE OF DIRECTOR/MEMBER/GENERAL PARTNER/PARTNER]:

Joe Rohrlich CEO

DocuSigned by:
Joe Rohrlich
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[NAME OF COMPANY/LLP/PARTNERSHIP]: Recurly, Inc.

Date: 7/28/2024