

## Modern Slavery and Human Trafficking Statement

### Our Commitment

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SugarCRM has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to implementing and maintaining effective systems and controls to prevent modern slavery in our operations and supply chains, including through greater transparency regarding our suppliers and their compliance efforts.

### Our Business

SugarCRM Inc. and its group companies offer software solutions that help marketing, sales and service teams reach peak efficiency through better automation, data, and intelligence so they can achieve a real-time reliable view of each customer. Based in the San Francisco Bay Area, SugarCRM has offices and operations in the United States, Europe, Asia and Australia.

### Risk Assessment

Based upon consideration of where we conduct business, our sector and supply chains, we believe the risk of modern slavery or forced labour within our business or supply chains is very low. However, should we identify any potential modern slavery or forced labour issues in our business or supply chain, we will investigate them and take appropriate action to address any identified concerns.

### Policies and Governance

We are committed to acting ethically and with integrity in all our business relationships and to enforcing appropriate systems and controls to prevent slavery and human trafficking. Key policies supporting this commitment include:

- **Code of Business Conduct and Ethics:** Outlines our expectations for ethical behaviour across the organisation, including a commitment to human rights, and applies to all employees.
- **Supplier Code of Verification and Certification:** Outlines our expectations for ethical, fair and honest behaviour of our providers.
- **Recruitment Policy:** Includes robust procedures to prevent forced labour, including right-to-work checks and verification processes for all staff, particularly in jurisdictions with elevated risk.
- **Whistleblower Policy:** Encourages employees and third parties to report concerns about unethical conduct, including modern slavery, without fear of retaliation.

### **Training and Awareness**

We provide training to relevant staff, particularly those involved in our procurement teams, to help them identify and mitigate risks related to modern slavery. We are also working to raise broader awareness within the business about the importance of vigilance against human trafficking and forced labour.