

Modern Slavery Policy

1. Purpose

The purpose of this document is to define the role that Unily's Executive Leadership Team (ELT) takes in identifying and preventing modern slavery and human trafficking in our operations and supply chain in accordance with the Modern Slavery Act 2015.

2. Scope

This policy applies to all employees and contractors of Unily Group Limited. In accordance with its obligations under the Modern Slavery Act 2015 (UK), Unily is also committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains. Unily expects the same high standards from all its suppliers and other business partners.

3. Responsibilities

- The Executive Leadership Team (ELT) is responsible for setting and approving the modern slavery policy.
- The GC is responsible for ensuring that roles, responsibilities, and authorities are appropriately assigned, maintained, and updated, as necessary.
- All employees have a responsibility to be alert to the risks of modern slavery and report any concerns or suspicions to line managers or via the whistleblower procedure.

4. Modern Slavery Policy Statement

Modern slavery does not have a single, fixed definition, and can manifest in several forms, including slavery, servitude, forced or compulsory labour, forced marriage, debt bondage and human trafficking. A common thread is the restriction of an individual's freedom by another person or group for the purpose of exploitation, whether for personal benefit or commercial gain.

Unily maintains a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operations and across our supply chain. We are committed to acting ethically, with integrity and transparency in all areas of our business. Unily operates in compliance with all relevant legislation.

Company structure:

Unily operates as part of a global group which includes several holding and operating entities across the UK, the United States and Australia. Key trading entities include Unily Group Limited (UK), Unily Limited (UK), Unily Inc. (US), Unily Australia Pty Ltd.

Business model:

Unily operates a global software-as-a-service (SaaS) model, providing a digital employee experience platform to medium and large enterprises. The platform enables organisations to connect, inform and engage their workforces through tools such as internal communications, content management, social collaboration, analytics and integrated employee journeys. Unily's solutions are deployed across more than 140 countries and are used by organisations ranging from 1,000 to over 100,000 employees, supported by integrations with enterprise systems including Microsoft 365, Salesforce and ServiceNow.

This technology-led business model relies on cloud-based delivery, long-term customer contracts, and ongoing product innovation to support global employee engagement and productivity.

Unily's operations include software development, product management, customer success, implementation consulting and ongoing customer support, enabling enterprises in sectors such as healthcare, financial services, retail and aviation to centralise their digital workplace tools and enhance organisational performance.

Supply Chain:

Unily's supply chain primarily consists of professional services, technology infrastructure and software-related suppliers that support the delivery of our digital employee experience platform. Our supply chain includes:

- Cloud hosting and data centre providers, primarily delivering secure infrastructure-as-a-service to operate our platform globally.
- Software and technology vendors that provide tools integrated into or required to support the Unily platform, including analytics, development, security and communication technologies.
- Professional service partners, including consultants, subcontractors and specialist service providers supporting product development, implementation, UX design and localisation.
- Corporate support suppliers, such as HR services, marketing agencies, recruitment partners, facilities management and hardware suppliers.

Given Unily's role as a digital services provider, our supply chain does not involve raw materials or large-scale manufacturing. However, we recognise that modern slavery risks can still arise in technology hardware, outsourced services, offshore contractors, and multi-tier software supply chains, and we therefore conduct due-diligence and supplier risk assessments proportionate to these risks.

We are committed to:

- Conducting risk assessments to identify areas of high modern slavery risk across our operations and supply chain.
- Verify, evaluate, and engage with suppliers to address modern slavery risks.
- Include modern slavery prohibitions in supplier contracts with rights to audit compliance.
- Provide training to staff on modern slavery risks and how to report suspicions.
- Protect whistleblowers who report modern slavery concerns.

To meet our commitments, we will:

- Develop a sustainable and transparent supply chain by mapping tier 1 and 2 suppliers.
- Audit suppliers in high-risk areas through supplier questionnaires.
- Require suppliers to cascade modern slavery requirements to their own suppliers.
- Provide training to employees on how to identify modern slavery risks during procurement.
- Appoint an individual to oversee the implementation of the policy and monitoring measurements.
- Report on our progress and performance.

This modern slavery policy represents our general position on these issues and the policies and practices we will apply in conducting our business.

Unily aims to provide satisfaction to all customers, stakeholders and interested parties whenever possible, meeting, and exceeding expectations.

Unily ensures the details of this policy are known to all internal and external interested parties, where appropriate and will determine the need for communication and by what methods relevant to the management system. These include but are not limited to customers and clients and their requirements as documented in contracts and specifications.

Unily complies with all legal requirements, codes of practice and all other requirements applicable to their activities.

Unily will maintain a management system that will achieve the company's objectives and seek continual improvement in the effectiveness and performance of the management system based on "risk".

Unily has set its objectives, programs and targets using the SMART (Specific, Measurable, Achievable, Realistic and Timed) principles. Objectives are planned and documented; inclusive of how each is to be achieved, and the actions required. Subsequently, the objectives are regularly monitored and reviewed.


To ensure the company maintains its awareness for continuous improvement, the management system is regularly reviewed by the Senior Management Team to ensure it remains appropriate and suitable for the business.

Document Owner and Approval

The General Counsel is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on the intranet and is published on the Unily.com website.

This policy was approved by the General Counsel and is issued on 12.02.2025.

Signed by:
Signature:  Sarah Batterbury Date: 12/02/2025
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Change History Record

<u>Issue</u>	<u>Description of Change</u>	<u>Approval</u>	<u>Date of Issue</u>
25.3.25	New Brand	Jenny May	25.3.25
12.2.26	2026 update	Sarah Batterbury	12.2.26