# **Australia Modern Slavery Statement**

# Introduction

N-able is a values-driven organization and we aspire to meet the highest professional and ethical standards. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. This statement sets out our global approach to modern slavery.

# **Reporting Entity**

This Statement is made on behalf of N-able Australia Pty Ltd. ("N-able Australia"), which is a subsidiary of N-able, Inc., a SaaS provider headquartered in the United States with offices in the United Kingdom, Canada, Austria, the Netherlands, Portugal, Poland, Romania the Philippines, and Australia.

### **Procurement Process**

N-able fuels IT services providers with powerful software solutions to monitor, manage, and secure their customers' systems, data, and networks. Built on a scalable platform, we offer secure infrastructure and tools to simplify complex ecosystems, as well as resources to navigate evolving IT needs. We help partners excel at every stage of growth, protect their customers, and expand their offerings with an ever-increasing, flexible portfolio of integrations from leading technology providers.

At the time of publication of this statement, N-able Australia employs 23 full time employees and have one office located at Level 9, 15 Blue Street, North Sydney, New South Wales 2060. Our workforce also includes four staff from the Netherlands and Canada who presently operate on working visas.

Given the nature of the services we provide and the professional workforce we employ, we assess the risk of modern slavery or human trafficking in our own organisation to be low.

#### **Supply Chain / Suppliers**

Our supply chain is comprised of primarily services, including IT services, professional or advisory services, travel services, and office supplies. During the 2023 calendar year, we engaged a range of suppliers and business partners, most of which are based in the United States. The remaining suppliers or business partners were predominantly based in Canada and the United Kingdom.

N-able conducts a security and background review of any vendors that handle personal data. N-able inquires about the measures our vendors take to meet the applicable legal requirements of slavery, forced labour and human trafficking laws and expects suppliers to enact practices to ensure compliance with such laws. Higher risk suppliers may be asked about their policies and procedures in place regarding human rights, modern slavery, forced labour, child labour or human trafficking.

In 2023, we strengthened our supplier due diligence processes by engaging a third-party supplier assessment platform which allows flagging of indicators related to human rights and decent working conditions. N-able may request corrective actions from suppliers to address areas of improvement related to human rights and decent working conditions.

# **Risks of Modern Slavery Practices in Operations and Supply Chains**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our internal policies reflect 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 are not taking place anywhere in our supply chain. Following assessment of our Australian business operations and supply chain, we consider that the overall risk of modern slavery existing within our immediate Australian operations and suppliers is low.

We categorise modern slavery risks for our business into the following key areas:

- <u>Local contractor and service arrangements</u>. Modern slavery risks arise where the services procured for the premises of business services involve exploited forms of work types such as cleaning services, indoor plant maintenance, document production and printing services. Through these arrangements N-able Australia is at minimal risk of being directly associated with modern slavery.
- <u>Suppliers of suppliers (tier 2 suppliers)</u>. Our supply chain, as with all supply chains, has several tiers
  and there are certain sectors and industries, products and services, geographic regions and
  supplier entities which carry a higher risk of modern slavery than others. While N-able Australia
  monitors its tier 1 suppliers with a USD \$100,000 spend and above and higher risk suppliers (based
  on geography or services being procured), it has less visibility or control of the business practices
  and operations of the suppliers of its suppliers (tier 2 and beyond). These suppliers may be
  associated with modern slavery risk. Through these arrangements N-able Australia has some risk
  exposure to contributing to or being directly linked to modern slavery. In view of the above, we
  believe the overall risk is low owing to:
  - The nature of the goods and services which we procure (software and related services).
  - The locations from which we procure them (mostly in developed markets).
  - Our procurement practices (for example, we agree to reasonable terms and ensure timely payment).
  - Checks against global sanctions and enforcement databases.

We also remain committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chain.

# Measuring the Effectiveness of N-able Australia's Actions

At this time, N-able Australia does not have in place a comprehensive risk assessment frame for assessing the overall effectiveness of its modern slavery response. N-able Australia has, however, relied upon being able to conduct a preliminary rudimentary assessment of its effectiveness based on the following measurements:

- The fact no material modern slavery incidents have been identified since N-able became a public company in July 2021;
- The N-able Australia entity operate through a centralised procurement and human resources system to minimise risks of Modern Slavery. All employees and contractors must acknowledge our Code of Conduct and participate in annual global Code of Conduct training.

 All N-ablites have the right to raise concerns about values, ethics and professional conduct without fear of retaliation. In addition to clearly defined internal channels, we maintain a global whistleblower hotline that allows colleagues to raise concerns relating to potential violations of laws and our firm's policies, professional standards and values in a confidential manner and, where legally permissible, anonymously. We do not tolerate retaliation of any kind.

# **Ongoing Steps**

N-able does not tolerate slavery, forced labour or human trafficking in any form and expects its suppliers to adhere to the same standards. In the forthcoming calendar year N-able is committed to:

- Establishing a cross-functional Human Rights Working Group to operationalize our approach to human rights due diligence and management, including on modern slavery;
- Adding additional screening to our vendor review process to include criteria such as the country of operation and government response as assessed by benchmarks such as the Global Slavery Index and Global Report on Trafficking in Persons; and
- Including additional supplier expectations in a mandatory Supplier Code of Conduct to align with emerging regulations, including respect for freedom of association, and continue our commitment to sustainable and ethical procurement.

This statement is made pursuant to Part 2 section 16 of the Modern Slavery Act 2018 and constitutes our modern slavery statement for the financial year ending 31 December 2023. The statement has been approved by the Board of Directors of N-able Australia signed by the director.

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Sara Sharp Director, N-able Australia Pty Ltd. 05 April 2024