

# Nuix Modern Slavery Statement

## 1. Introduction

This Modern Slavery Statement (“the Statement”) for Nuix Limited covers the period of 1 July 2021 to 30 June 2022 (“Reporting Period”).

This Statement applies to Nuix Limited and all group entities, including Nuix North America Inc, Nuix SaleCo Limited, Nuix USG Inc, Nuix Ireland Ltd, Nuix Technology UK Ltd, Nuix Pte Ltd, Nuix Holding Pty Ltd, Topos Labs, LLC and the Nuix Philippines Regional Office Head Quarters (a branch of Nuix Holding Pty Ltd). This Statement has been produced in accordance with the Australian *Modern Slavery Act 2018* (Cth) and the United Kingdom *Modern Slavery Act 2015* (UK).

Nuix’s vision is to find truth in a digital world, and this is underpinned by our values of Customer, Innovation, Teamwork, People, Integrity and Passion and supported by our Code of Conduct. These are fundamental to who we are and how we operate.

This Statement outlines the steps Nuix has taken to identify and address the risks of modern slavery to its business operations and supply chain.

Nuix is fully committed to preventing modern slavery and human trafficking in our operations and supply chains across all jurisdictions in which we operate. Nuix is also committed to continuously improving its processes and policies with respect to the identification and elimination of modern slavery.

## 2. Business Structure

### Our structure

Nuix Limited is an Australian incorporated company and is listed on the Australian Securities Exchange. Nuix Limited is the ultimate and parent entity of the Nuix Group and has 9 entities across Australia, the United States, Ireland, the United Kingdom, the Philippines and Singapore. More information about the principal activity and country of incorporation of the entities in the Nuix Group can be found in Nuix Limited’s Annual Report. All companies in the Nuix Group follow policies set by Nuix Limited.

### Our operations

Nuix is a leading provider of investigative analytics and intelligence software with a vision of “finding truth in a digital world”. Nuix software has been used in investigations into some headline events over the last 15 years, including the Panama Papers, the Royal Commission into Misconduct in the Banking, Superannuation and Financial Service Industry in Australia, organised crime rings, corporate scandals and terrorist activities.

Nuix offers a software platform powered by a powerful data processing engine – the Nuix Engine – and is comprised of a number of software applications which provide visualisation, analytics and relationship-mapping for customers. Nuix is used by many of the world’s leading corporations, regulators, governments, law firms, advisories and service providers.

Nuix is headquartered in Sydney, Australia and had a total headcount of 475 at 30 June 2022, in 14 countries across North America, EMEA and Asia Pacific. The majority of our workforce is based in Australia and the US. Additional information on our activities, performance, products and services can be found on our website [www.nuix.com](http://www.nuix.com).

## Our Corporate Values

Nuix strives to foster a customer-collaborative and innovative culture through a talented team of employees who are motivated to build software with purpose and assists its customers to contribute to a wider public and social good.

Our six values underpin our approach to everything we do which includes our approach to modern slavery and human rights issues, whether it be in the work we do in the community via the Nuix Foundation, our work via our partnerships or supply chains, or our employees.

We believe these values underpin Nuix as an organisation as well as our approach to modern slavery and human rights issues. We are committed to acting ethically throughout our organisation by complying with all applicable legal obligations and we take a zero-tolerance approach to any form of modern slavery.

## 3. Nuix's Modern Slavery Risks

Based on our industry, business model, procurement profile and geographical footprint, we have assessed the risk that we cause, contribute to, or are directly linked to modern slavery as low.

We have assessed the risk of modern slavery within our direct business operations as low, given the relatively low outsourcing and consequent level of control we have on our operations and our comprehensive labour management controls.

We have assessed the risk of modern slavery practices in our supply chain as low. This assessment is based on the geographical footprint of our suppliers and the types of services and products provided. Our procurement generally consists of technology, professional services, recruitment and labour hire, marketing, and facilities management expenditures.

We recognise that we may have indirect exposure via extended supply chains – for example, suppliers we purchase electronics from. Nuix may also be exposed through our network of partners who actively market, and in some cases support, the Nuix platform.

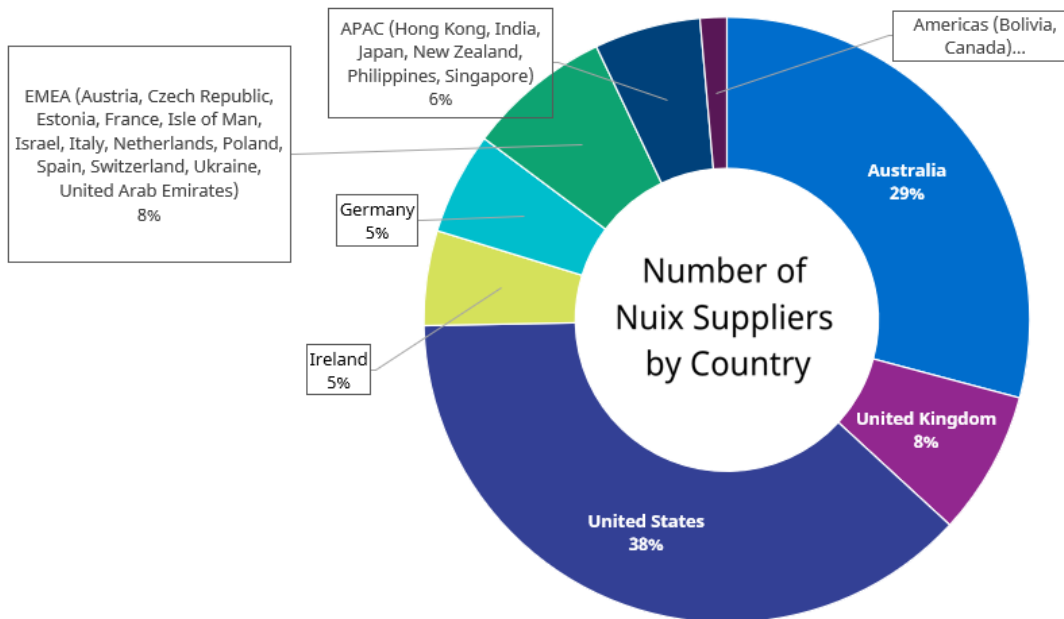
### Our Supply Chain

During the period, we engaged with approximately 500 suppliers across 26 countries. Approximately 98% of our spend was with suppliers in countries deemed low risk for slavery according to the Global Slavery Index. Where Nuix engages with suppliers in countries deemed medium risk, the category of the products or services being procured is deemed low risk. Nuix does not engage with any suppliers who are located in countries deemed as high risk according to the Global Slavery Index.

The Global Slavery Index flags electronics (laptops, computers and mobile phones) from China and Malaysia as products at risk of modern slavery. Whilst Nuix does have significant technology spend, no electronics are procured directly from China, Malaysia or other countries deemed high risk.

Nuix also procures services from suppliers who provide facilities management services (e.g., cleaning, maintenance, and security). These types of services are deemed as higher risk for labour exploitation.

Nuix strives to do business with customers, partners and suppliers of sound business character and reputation. Nuix does not knowingly support any public or private organisation which espouses unethical or discriminatory policies or practices.



## 4. How Nuix has addressed its Modern Slavery Risks

### Our employees

Nuix uses reputable recruitment agencies and Place of Employment (POE) providers when sourcing and engaging employees who are required to comply with the relevant labour laws in each of the 14 countries in which Nuix has direct employees, contractors or staff engaged via POEs.

Nuix has strong processes in relation to the recruitment, onboarding and rewarding of all our direct employees. We regularly monitor the hours that they are working and have programs in place to address their wellbeing. On an annual basis, salaries are reviewed to ensure that they are consistent with the market and that all legal obligations are met. Relevant jurisdictions have policies in place in relation to the payment of overtime when additional hours are required to be worked.

One of Nuix’s company principles is “integrity”, and this is used as a baseline for ongoing self-auditing and reporting for key areas of compliance. We believe in this principle and seek to weave it into the fabric of our daily work at Nuix. In doing so, we co-create a dynamic and purposeful company culture that we can be proud of and want to belong to.

### Training

All new Nuix employees undergo onboarding and compliance training that covers obligations under Nuix’s policies on topics such as:

- Code of Conduct
- Anti-Harassment and Bullying
- Anti-Corruption and Anti-Bribery
- Grievance Policy
- Equal Employment Opportunity and Anti-Discrimination Policy
- Whistleblower Policy

- Overtime and Leave Policy

These policies provide an infrastructure for exposing unethical or illegal behaviour which may present concerns under modern day slavery and trafficking legislation and regulations, thereby mitigating the risk that Nuix has internal compliance issues. We also conduct background checks on incoming employees, as permitted by applicable law.

On an annual basis, all staff are required to complete refresher training on the above policies to ensure knowledge is kept up to date. In addition, our Code of Conduct sets out guidelines for expected behaviour of our employees and to not knowingly participate in any unethical or illegal activity and provides a reporting procedure if an employee becomes aware of any actual or potential violation of the Code. Our Whistleblower hotline is managed by an independent third party, EthicsPoint, to enhance communication and empower our staff to promote safety, security and ethical behaviour.

All policies are made available to employees via our Intranet.

### Our supply chain

Nuix has a consistent and conservative approach to contracting with new suppliers which is aimed at guarding against and also pinpointing risk with such suppliers. Nuix's standard vendor terms also include modern slavery commitments.

### Our Partner Network

Nuix has several different types of partners including resellers, distributors, advisories and service providers, integration partners, authorising training partners and original equipment manufacturing partners. Nuix Partners must comply with the fundamental legal and ethical principles described in the Partner Code of Conduct which is a condition of a Nuix Partner or Channel agreement.

Nuix expects all its Partners to perform their work with honesty, truthfulness, and integrity. The Partner Code of Conduct articulates the policy of Nuix, and our expectation of Nuix Partners to comply with all applicable laws, human rights and labour standards.

Nuix has a High-Risk Country Policy which applies to any new partner in such jurisdictions (i.e., those rated in the bottom 25% of certain human rights and corruption indices) and requires rigorous sanctions checking and internal executive approvals.

## 5. Recent developments and looking forward

### The Past Year

We have not been made aware of any allegations of human trafficking / slavery against any of our subsidiaries, suppliers or partners. If an allegation were to be made, we would take the appropriate actions immediately which would include informing the relevant authorities and customers.

In the Reporting Period, we achieved the following:

- We completed checks on our key suppliers through a modern slavery questionnaire
- We executed our modern slavery and human trafficking due diligence and risk assessment checks for new 3<sup>rd</sup> parties as part of onboarding
- We conducted a review of our vendors to assess inherent country risk and type of product / service risk exposures

- We made improvements to procure to pay processes and controls and updated our delegations of authority

### The Year Ahead


We are committed to continuously monitoring risks in our operations to ensure the steps we take to protect against modern day slavery and human trafficking are relevant and effective. As such, in the financial year ending 30 June 2023 we aim to have:

- Reviewed our Modern Slavery Policy and made updates as necessary
- Further uplifted our procure to pay governance, processes and controls
- Improved our 3<sup>rd</sup> party due diligence capabilities by investing in 3<sup>rd</sup> party solutions
- Implemented a HR Information system and supporting processes and controls to further improve our new employee onboarding capabilities

## 6. Consultation and Board Approval

All Nuix entities operate under a common set of governance and risk management policies and programs. This includes the policies and programs through which modern slavery and human rights risks are assessed and addressed.

This Statement has been approved by the Nuix Board in consultation with relevant stakeholders and circulated to the directors of Nuix Limited for comment prior to its formal approval by the Board on 17<sup>th</sup> November 2022.



Jonathan Rubinsztein

Nuix Limited Group CEO and Managing Director

17<sup>th</sup> November 2022