

EBSCO International, Inc.

Australian Branch

Modern Slavery Statement

Background

Modern slavery can be found in every country and every sector. The United Nations (UN) and Walk Free Foundation estimate that in 2021 there were approximately 49.6 million victims of modern slavery worldwide. Modern slavery risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Australia were produced with modern slavery. Entities and government institutions doing business in Australia have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced through Modern Slavery Act 2018 (the "Act"), aim to increase industry awareness and transparency and drive businesses to improve practices. The Act requires entities to report on the steps taken during its previous financial year to prevent and reduce the risk that modern slavery is used at any step of the production of goods in Australia or elsewhere by the entity or of goods imported into Australia by the entity. There are seven mandatory reporting areas that must be investigated and reported on which include:

- Its structure
- Its operations and supply chains
- The risks of modern slavery practices in its operations and supply chains
- The actions it has taken to assess and address modern slavery risks
- How it assesses the effectiveness of actions being taken to assess and address modern slavery risks
- Any measures taken to remediate any modern slavery.
- The process of consultation with any entities it owns or controls
- Any other relevant information

Introduction

This report is EBSCO International, Inc. Australian Branch (“EBSCO” or “Entity”) response to the Australian Modern Slavery Act 2018 (the Act).

EBSCO satisfies the definition of an Entity within the Act by carrying on business in Australia and having a consolidated revenue of at least AU\$100 million.

The financial reporting year of EBSCO covered by this report is for the year ended June 30, 2025.

Structure, Operations & Supply Chain

EBSCO operates as a foreign branch office of EBSCO International, Inc. (ABN 51 002 260 602) with its headquarters located at Level 8, 132 Arthur Street, North Sydney NSW 2060. There are 79 employees of the Entity. EBSCO International, Inc. is headquartered in the United States.

The Entity is a provider of research databases, e-journal and e-package subscription management, book collection development and acquisition management, and a major provider of library technology, e-books and clinical decision solutions for universities, colleges, hospitals, corporations, government, K12 schools and public libraries worldwide.

In providing these services, EBSCO partners with its customers and other industry-leading organizations to improve research and outcomes through quality content and technology.

EBSCO operates within the primary components of:

1. Subscription and book agent services where EBSCO functions as an intermediary between publishers and organizations who purchase content produced by publishers.
2. Reselling of published content that is packaged for sale to academic, corporate, medical, and government institutions.
3. Development of software as a service, which is sold to academic, corporate, medical, and government institutions worldwide.

EBSCO’s supply chain involves content producers, publishers, support service providers, and the purchasers of content. Most publications supplied in both scenarios come from large commercial organizations in Europe or North America, or from smaller academic organizations who consume content from writers seeking to be published.

Risks of modern slavery practices

A risk assessment of EBSCO’s industry of operation, goods procured, and countries goods are procured from has been performed over material direct suppliers. For the purposes of this report, material suppliers are publishers who account for at least 1% or more of EBSCO’s total publisher procurement spend during the 2025 fiscal year and suppliers who provide direct support services to EBSCO’s office and personnel. This risk assessment used two separate indices to conclude on the inherent risk of modern slavery related to industry, goods and countries - Walk Free’s Global Slavery Index and the US Department of Labor’s

List of Goods Produced by Child Labor or Forced Labor.

Industry of Operations

EBSCO operates within the information services industry. This industry has not been identified within these two indices as having an inherent risk exposure to modern slavery.

Countries Goods are Procured From

For this assessment, a review of countries which goods are procured from focuses on the location of direct publisher operations. Direct material publishers that supply EBSCO are located in the United States, the United Kingdom, Netherlands, Germany, Australia and New Zealand. Each of these countries has been identified by the two indices as having a low-risk exposure to modern slavery.

Goods Procured

As described in the previous section, EBSCO's supply chain involves content producers, publishers, support service providers, and the purchasers of content. A risk assessment of the goods within these categories has been conducted and identified an initial inherent risk of modern slavery the procurement of electronics for EBSCO's internal use. All other remaining goods were not identified within the two indices, therefore concluding a low-inherent risk exists.

Actions Taken to Address Modern Slavery Risks

EBSCO has the following actions to mitigate the risk of modern slavery within internal activities and its supply chain:

Internal Policies

Employee Code of Conduct

Employees are trained on both the Code of Conduct, which addresses EBSCO's commitment to the United Nations Universal Declaration of Human Rights, as well as the risks of modern slavery and expectations for employees regarding such risks.

EBSCO's Employee Code of Conduct is provided to all employees as part of the onboarding process and outlines the Entity's standards and expectations of behaviour. EBSCO respects the rights of every individual and abides by the employment laws in the markets where operating.

Stated within this code, EBSCO supports and promotes a workplace environment free from discrimination based on race, skin colour, religion, creed, sexual orientation, disability, gender, age, national origin, citizenship status, marital status, veteran status or any other legally protected characteristics.

If an employee has a concern regarding the misconduct of another employee or concerns related to this

Act, they are encouraged to report the incident using EBSCO's Ethical Reporting Hotline.

Management reviews the Code of Conduct with employees during onboarding and every three years thereafter, ensuring their understanding and adherence to expectations.

EBSCO Ethical Reporting Hotline

If an employee has concerns regarding the conduct and behaviour of others or, suspected or actual instances of issues relating to the Act, individuals are encouraged to report their concerns using EBSCO's Ethical Reporting Hotline.

All reports made are sent to a third-party, therefore ensuring that they are dealt with responsibly and timely. Employees have the option to report anonymously if desired. EBSCO does not tolerate retaliation against any employee who reports in good faith.

Anti-Corruption Policy

EBSCO's Anti-Corruption Policy strictly prohibits all forms of corruption and bribery. This policy applies to directors, officers, and employees, as well as agents, consultants, joint venture partners, and any other third-party representatives. To ensure compliance, EBSCO provides anti-corruption training and resources to applicable employees and agents. By doing so, the company reinforces its commitment to maintaining the highest ethical standards across all levels of its operations and partnerships.

Due Diligence Processes

Supplier Code of Conduct

EBSCO continues to only use suppliers that are trusted and compliant with employment law and human rights legislation. Its Supplier Code of Conduct specifically prohibits forced labour, child labour, and human trafficking. Suppliers are expected to cascade similar expectations through their own supply chains.

The Supplier Code of Conduct explicitly states that suppliers will not use slave, prisoner, or any other form of forced or involuntary labour, and they are also prohibited from employing child labour. EBSCO has a zero-tolerance regarding the employment of children, emphasizing their commitment to ethical labour practices. Additionally, harassment or discrimination of any kind will not be tolerated by EBSCO, and suppliers' employees have the right to refuse work. The Code of Conduct requires suppliers to comply with all applicable laws and regulations in their country of operation to ensure fair and lawful treatment of their workforce.

Supplier Contracts

Where supplier contracts are used, EBSCO requires vendors to comply with all applicable laws, ordinances, codes, regulations, standards and judicial and administrative orders related to their performance with the Entity. Suppliers are also expected to adhere to EBSCO's Code of Conduct and Anti-Corruption Policy.

EBSCO holds audit rights in some of its contracts with suppliers, allowing the opportunity to review supplier compliance with certain terms and conditions of EBSCO. These assessments do not specifically focus on child labour or forced labour however, this has been identified as an opportunity to develop going forward.

Monitoring and Reporting

EBSCO monitors its operations, partners, and suppliers for potential violations on an ongoing basis and will act if a violation occurs up to and including termination of employment or contract. Employees, suppliers, contractors, or others can report any incidents or concerns using EBSCO's reporting system available at ebscointegrity.com.

EBSCO has identified the opportunity to include audit requirements related to its Supplier Code of Conduct, including compliance with laws on human trafficking and slavery, within all supplier contracts. This exercise will allow EBSCO to further assess its effectiveness in evaluating and mitigating risks related to the Act.

Awareness Training

EBSCO does have formal training in place for all 79 employees on the topic of modern slavery. During these sessions, all employees and contractors are trained on EBSCO's Code of Conduct, which addresses its commitment to the United Nations Universal Declaration of Human Rights, as well as the risks of modern slavery and EBSCO's expectations for employees regarding these risks. This training is offered to employees at time of hire and required to be completed every third year following.

Additional training provided to employees includes the review of relevant policies identified above. When onboarding new employees and every third year following, part of this process involves reviewing the Employee Code of Conduct, Anti-Corruption Policy and Ethical Reporting Hotline, to ensure the individual understands the Entity's standards and expectations. Sections within these documents which are relevant to modern slavery include EBSCO's intolerance for discrimination, advocating for the respect of individual rights, and encouraging employees to report any conduct or behavioural concerns.

Assessing Effectiveness of Actions

To track EBSCO's effectiveness of procedures to mitigate the risk of modern slavery, the following mechanisms are in place:

Internal Activities

EBSCO's internal policies continue to be compliant with current human rights and employment law legislation and are regularly reviewed and amended in accordance with any statutory changes. EBSCO also provides training to employees at time of onboarding, and every three years following on Modern Slavery including content explicit to risks relating to the Act. This training increases employees awareness

of the Act and therefore, is a mechanism to reduce the risk of modern slavery within EBSCO's activities. EBSCO is able to track employee compliance with these assigned trainings and report on any employees who have not completed the training.

Supplier Activities

As a first step, EBSCO has identified its first-tier suppliers. The Entity has committed to sending its supplier code of conduct to all first-tier material suppliers, requesting their attestation. Should suppliers be identified in high-risk products, sectors or countries, these suppliers will be first targeted for follow-up on all attestations. In addition, the high-risk vendors will be asked to attest on at least a bi-annual basis. As EBSCO's customers are ultimately responsible for choosing which publishers they desire to purchase materials from, EBSCO is not always able to proactively identify publishers for attestation. However, it has focused its efforts on publishers with whom it does material business.

EBSCO assigns a person or committee to review the attestations and make determinations of acceptability. Reviewers will accept non-compliance for the following scenarios, provided such acceptance of risk and the related reasoning are documented within the attestation system:

- a. Submission of a comparable code of conduct used for the respondent's supply chain.
- b. Non-Response: Annual spend of \$100,000 or less; services infrequently used; services do not directly support our customers; vendors not providing high-risk services or providing services in high-risk countries
- c. Inability to attest to the verification and compliance portion of the policy: Annual spend of \$100,000 or less; services infrequently used; services do not directly support our customers; vendors not providing high-risk services or providing services in high-risk countries.

EBSCO is evaluating the implementation of compliance attestations and audit rights within supplier contracts related to these areas and consider the use of on-site audits for compliance.

Remediation of Modern Slavery

To mitigate the risk of modern slavery within supply chains, EBSCO incorporates the following mechanisms for supplier due diligence:

Supplier Code of Conduct

All suppliers of EBSCO are expected to adhere to the Supplier Code of Conduct. This code explicitly prohibits suppliers from using slaves, prisoners, or any other form of forced or involuntary labour, as well as from employing child labour, therefore reflecting EBSCO's commitment to ethical labour practices. Furthermore, EBSCO does not tolerate any form of harassment or discrimination, and suppliers' employees have the right to refuse work. The Code of Conduct mandates that suppliers comply with all applicable laws and regulations in their country of operation to ensure fair and lawful treatment of their workforce.

Supplier Contracts

EBSCO's Supplier Contracts require suppliers to comply with all relevant laws, regulations, and orders when fulfilling their obligations with EBSCO. Additionally, by signing the contract, suppliers are expected to adhere to EBSCO's Code of Conduct, which specifically prohibits the use of modern slavery.

Monitoring and Reporting

EBSCO continues to monitor its operations, partners, and suppliers for concerns and violations, including those related to this Act. EBSCO encourages its suppliers and employees to report any concerns related to behavior or conduct, using the Entity's Ethical Reporting Hotline.

Using these mechanisms, EBSCO is continuing its efforts in evaluating and mitigating the risk of modern slavery through its supply chain and activities.

Steps Taken to Prevent & Reduce Risk of Modern Slavery

EBSCO has taken the following steps to prevent and reduce the risk of modern slavery:

1. Mapping activities: As part of this report, EBSCO has mapped its activities to complete a risk assessment to align with the Act.
2. Mapping supply chains: As part of this report, EBSCO has mapped its supply chain to complete a risk assessment to align with the Act.
3. Conducting an internal assessment of risks of modern slavery in the organization's activities and supply chains: As part of this report, EBSCO has identified risks within its activities and supply chain that have inherent risks of modern slavery. EBSCO recognizes the need to further develop this risk assessment process to expand beyond evaluating tier 1 suppliers as well as gathering additional information on source countries and goods, to fully assess this risk across the supply chain.
4. Developing and implementing due diligence policies and processes for identifying, addressing, and prohibiting the use of modern slavery in the organization's activities and supply chains: See policies and due diligence processes section for those identified as relevant to the Act.
5. Developing and implementing anti-modern slavery standards, codes of conduct and/or compliance checklists: EBSCO has identified expectations of suppliers regarding modern slavery within its supplier Code of Conduct and supplier contracts.
6. Monitoring suppliers: Suppliers are monitored on an ongoing basis. EBSCO holds audit rights in some of its contracts with suppliers and therefore, allows the opportunity to review supplier compliance with the Code of Conduct and supplier contract, where applicable.
7. Developing and implementing training and awareness materials on modern slavery: EBSCO does have formal training in place for employees on the topic of forced labour – Modern Slavery Training.
8. Developing and implementing procedures to track performance in addressing modern slavery: EBSCO has identified mechanisms in place and to be developed relating to assessing the

effectiveness of reducing the risk of modern slavery within internal activities and those dealing with suppliers.

Consultation

EBSCO International, Inc. Australian Branch does not own or control any other entities.

Approval

In accordance with the requirements of the Act, this statement was approved the the board of EBSCO in their capacity as principal governing body of EBSCO International, Inc. Australian Branch on December 18, 2025.



Allen Powell, Director