



Sphera's Statement Against Modern Slavery 2025

Sphera Solutions, Inc. is the leading provider of Environmental, Social and Governance (ESG) performance and risk management software, data and consulting services, with a focus on Environment, Health, Safety & Sustainability (EHS&S), Operational Risk Management, Product Stewardship, and Supply Chain Transparency. This statement applies to Sphera Solutions, Inc. as well as its subsidiaries ("Sphera").

Sphera is committed to promoting a workplace and supply chain where workers are treated with respect and dignity, and which are free from modern slavery and human trafficking. This statement is Sphera's global statement on modern slavery and human trafficking, including under the Modern Slavery Act 2015 of the United Kingdom and the *Australia Modern Slavery Act 2018* (Cth) (collectively, the "Modern Slavery Acts"), and constitutes Sphera's Modern Slavery statement for the financial year ending December 31, 2024. This statement supersedes any prior Sphera statements or policies on modern slavery and human trafficking.

About Sphera

Through SaaS, proprietary data and consulting services, Sphera helps customers chart a course to ESG improvement that mitigates risk and improves safety, sustainability and productivity. Sphera is incorporated in the United States, with headquarters in Chicago, Illinois, U.S. Sphera is a privately held company with a number of subsidiary companies around the globe. Sphera has approximately 1,300 employees spread throughout the world.

Sphera recognizes that modern slavery is a significant problem worldwide and commends the efforts of governments and the private sector to eradicate it. Sphera is committed to acting ethically and with integrity in our business relationships and maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products. Sphera is committed to preventing and detecting modern slavery in our business and supply chain.

Modern Slavery Risks

As a SaaS company, we have a fairly limited supply chain, and our services are mainly produced through the work of our professional staff. The main types of goods and services that we procure are:

- software and IT services and products; and



- professional services (e.g. legal, accounting, audit, tax).

We also have various suppliers who supply goods and services for our general operations, including office supplies, cleaning services, and facilities management for our headquarters in Chicago and other offices across the globe. We engage our suppliers on an as-needed basis.

We acknowledge that there is some inherent risk of modern slavery in the IT sector. However, based on our business model and mitigating factors, Sphera believes that its risk related to modern slavery is limited. Sphera does not typically have intricate supply chains, multiple contractor or subcontractor levels, or vendor relationships with large manufacturing businesses or companies that use high-risk raw materials where modern slavery has often been found to be an issue.

We primarily procure tools and services from suppliers which are not based in countries that have been identified as having a high geographical risk of modern slavery. Our professional advisors are typically based in low-risk countries, and they operate in sectors which are generally well regulated and are not known to involve high risk of modern slavery.

We have reviewed our supply chain in fiscal year 2024 and confirmed that the risk of modern slavery within our operations and supply chain remains minimal. We have mitigated these risks through the due diligence we undertake with respect to our suppliers and the requirements we impose on our suppliers. We are screening and monitoring third-party partners and suppliers for reported violations and enforcement actions relating to modern slavery. We will continue to monitor the risk and undertake assessment of future suppliers that we engage.

Policies

Sphera maintains policies governing our business conduct that are applicable across our global group, in order to help ensure that we comply with applicable laws everywhere we do business. Our existing policies are designed to help ensure that modern slavery does not exist in our workplace or in our supply chain. The Sphera Code of Conduct outlines how Sphera conducts business and describes the company's most fundamental shared values. It provides Sphera employees and suppliers guidance on how to follow company policies, to comply with applicable laws, rules and regulations, and to report possible violations. It is vital that Sphera employees act with integrity and in accordance with local laws. Further, we require our suppliers to have in place policies and procedures to ensure compliance with all applicable laws and regulations.



Sphera Measures to Prevent Modern Slavery

Sphera takes action to ensure that modern slavery is not taking place in our workplace or in our supply chain, including by:

- Providing training and raising awareness to all employees, including through our Code of Conduct, which was updated in 2025. This update reaffirms Sphera's commitment to respecting human rights, complying with laws prohibiting modern slavery and human trafficking, as well as requiring business transactions in accordance with applicable laws and ethical requirements of Sphera's Code of Conduct. All Sphera employees are required to review the Code of Conduct, are trained on the expectations of the Code of Conduct and acknowledge that they will adhere to the Code of Conduct while employed at Sphera, which includes reporting any possible violations of the Code of Conduct.
- Using reputable employment agencies to source our colleagues.
- Engaging colleagues and workers on the basis of recognized employment or independent contractor relationships in accordance with local laws. Providing clear information about wages and benefits to workers before they are hired and ensuring that wages and benefits comply with local laws.
- Evaluating our vendors and suppliers prior to engaging them. Conducting certain risk-based due diligence on vendors and suppliers, including the verification of information provided to Sphera.
- Employing updates (as available) to our third-party screening tool which screens for additional risks within our suppliers' networks.
- Requiring our suppliers and vendors to comply with all applicable laws and to have policies and practices in place that are aligned with our Code of Conduct.
- Working closely with our subsidiaries to ensure their compliance with applicable laws, including the Modern Slavery Acts.
- Reporting concerns related to modern slavery. Sphera offers multiple reporting channels to our employees, suppliers, and business partners, including a helpline and reporting tool that provides individuals with the opportunity to report concerns anonymously. We promote awareness of these reporting channels through internal policies, communications, and training. We also prohibit retaliation against anyone who, in good faith, reports any matter relating to modern slavery or who assists in the investigation of a reported concern.

Assessing our Effectiveness

Throughout this reporting period we focused on gaining a better understanding of the modern slavery risks that may be present in our operations and supply chain. We expect that this improved understanding of these risks in our own operations and supply chain



and those of our direct suppliers will inform our future assessments of the appropriateness of our actions. Our main key performance indicator is tracking successful completion by colleagues of our annual training on our Code of Conduct, including relevant testing that is part of the training.

We remain committed to continuously evaluating and enhancing our processes and systems to ensure the effectiveness of our modern slavery compliance efforts. This includes ongoing assessment of our existing policies and procedures. In 2024, we conducted a review of our policies and supplier screening practices to ensure alignment with evolving international standards. We also closely monitor regulatory developments in jurisdictions where we operate.

Approval

In developing this statement, Sphera engaged and consulted with its owned and/or controlled entities to verify the accuracy of its contents. This statement was approved by the Board of Directors of Sphera Solutions, Inc., in their capacity as principal governing body of Sphera Solutions, Inc. on June 27, 2025.

Signed on the Board's behalf by:

A handwritten signature in blue ink, appearing to read "P. Marushka", with a stylized flourish at the end.

Paul Marushka
President and CEO