

Sphera’s Statement Against Modern Slavery

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 and Product Stewardship. 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 years ending December 31, 2020 and December 31, 2021.

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 1,000 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 all 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 has zero tolerance for any form of modern slavery in our business and we are fully committed to preventing and detecting it.

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 hardware; 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 use of high-risk raw materials where modern slavery has often been found to be an issue.

We also 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 risks of modern slavery.

We have reviewed our supply chain in fiscal years 2020 and 2021 and have identified minimal risks in our supply chains with respect to the engagement of our suppliers and professional service advisors. We consider these risks mitigated given the due diligence we undertake with respect to our suppliers and the requirements we impose on our suppliers. We will continue to monitor the risk and undertake assessment of future suppliers that we engage.

Policies

Sphera complies with applicable laws everywhere we do business. Our existing policies are designed to 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 guidance on how to follow company policies and comply with applicable laws, rules and regulations. It is vital that Sphera employees act with integrity and in accordance with local laws. Further, we require our suppliers to establish 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 awareness to all employees, including on our Code of Conduct. All Sphera employee 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.
- 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. Requiring our suppliers and vendors to comply with all applicable laws.
- 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 chains. We expect that this improved understanding of these risks in our own operations and supply chains and those of our direct suppliers will inform our future assessments of the appropriateness of our actions. Our main key performance indicator is tracking the percentage of Sphera employees who complete internal training on our Code of Conduct.

We remain committed to developing systems in future reporting periods to ensure we are able to sufficiently assess the effectiveness of our modern slavery compliance action, including the effectiveness of our existing policies and processes. In future reporting periods, we intend to monitor our performance against a number of additional key performance indicators.

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, 2022.

Signed on the Board's behalf by:



Paul Marushka
President and CEO