

Nuix Modern Slavery Statement

1. Introduction

This is the first Modern Slavery Statement (the “Statement”) for Nuix Limited and covers the period of 1 July 2019 to 30 June 2020 (“Reporting Period”).

This Statement applies to Nuix Limited and all subsidiary entities, including Nuix North America Inc, Nuix USG Inc, Nuix Ireland Ltd, Nuix Technology UK Ltd, Nuix Pte Ltd, Nuix Holding Pty Ltd, 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 parent company of the Nuix Group and has a total of 6 subsidiaries across Australia, the United States, Ireland, the United Kingdom 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 Prospectus.

All companies in the Nuix Group follow policies and processes set by Nuix Limited or its subsidiaries.

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 certain 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. As at 31 December 2020, Nuix had over 1,000 customers across 78 countries.

As at 30 June 2020, Nuix had 421 full-time equivalent staff operating from 11 countries worldwide. The majority of our workforce are based in Australia and the US.

Additional information on our activities, performance, products and services can be found on our website www.nuix.com.

Our Corporate Values

Nuix's 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

Nuix has assessed the risk of modern slavery within our direct business operations as low, given the level of control we have our operations and our comprehensive labour management. However, we recognise that we may be indirectly exposed to these risks through our supply chain and partner network.

We have not been made aware of any allegations of human trafficking / slavery activities 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.

Higher risk spend categories via our supply chain and partner networks

We have identified the following procurement categories that may have a higher risk of modern slavery:

- Facilities service providers (e.g., cleaning services, office maintenance, waste management and security)
- Information & Communication Technology (ICT) infrastructure and hardware

Higher risk locations

Based on information sourced from the Global Slavery Index¹, we believe that our higher-risk locations may be the following, however we do not believe we have any material exposure.

- Republic of the Philippines
- Republic of India
- Republic of Singapore
- United Arab Emirates

4. How Nuix has addressed its Modern Slavery Risks

¹ Walk Free Foundation (2018) *Global Slavery Index*, available from: www.globalslaveryindex.org

Our employees

We use reputable recruitment agencies when sourcing employees who are required to comply with the relevant labour laws in each of the 11 different countries where we have staff located.

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 them 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

The above 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.

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 chains and partner network

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.

As of 31 December 2020, Nuix's supply chain comprised over 1,640 direct suppliers across 36 jurisdictions globally.

What we buy:

Our procurement generally consists of the following:

- **Information and Communications Technology (ICT)** – This is our main spending category and includes software, cloud platform services, hardware, computer systems, telecommunication devices, video technology and network technology. The majority of our suppliers are top tier companies such as Amazon Web Services and Microsoft.
- **Facilities** – Nuix has offices and employees in 11 different countries with corresponding spend on facilities services including cleaning services, office maintenance, energy and utilities, waste management and security, as well as furniture supplies, consumables and stationary.
- **Marketing** – This includes spend on online marketing, advertising agencies, events, travel and entertainment.
- **Professional Services** – This includes spend on consulting, advisory, software development and legal services.

Who we partner with:

Nuix has several different types of partners including resellers, distributors, advisories and service providers, integration partners, authorising training partners and original equipment manufacturing (OEM) partners.

A Nuix Partner is defined as all Nuix business partners (and all personnel or representatives employed or engaged to provide services to those business) including but not limited to Nuix distributors, resellers, agents, and any other party to a Nuix partner or channel agreement.

Nuix recognises that its Partners may operate in different legal and cultural environments and 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.

5. Recent developments and looking forward

Impact of COVID-19 to our supply chain

In accordance with our corporate Values, we are committed to maintaining strong supplier relationships and fostering open communications with our suppliers about COVID-19 risks and are pleased to report we have not identified an increased risk of modern slavery to workers in our supply chain for the reporting period.

The Year Ahead

We are committed to assessing the 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 2021 we aim:

- To further assess and review our existing supplier and partner network's compliance with the law and their reputation, issue a supplier/partner questionnaire.
- To front-end our awareness of partner and supplier compliance, amend our current third-party risk assessment to include questions aimed at uncovering potential modern-day slavery and human trafficking issues, and eliciting minimum commitments with respect to ongoing compliance.

- To ensure our policies and recruitment processes are appropriate to protect against modern day slavery and human trafficking, conduct a review, and prepare a first draft of a new modern day slavery policy which will (when finalised) be dispersed to Nuix personnel. This will educate employees about the causes and impacts of modern slavery, thus enabling them to promptly identify and report any issues.
- To further enhance and communicate our position against modern day slavery, include specific clauses regarding compliance with Modern Slavery legislation for all new partner and supplier contracts.

6. Consultation and Board Approval

Our Modern Slavery Statement was reviewed by our Region Counsel and circulated to the directors of Nuix Limited for comment prior to its formal approval by the Board on 30 March 2021.



Rod Vawdrey

Nuix Limited Group CEO and Director

29 March 2021