



OneTrust Anti-Slavery and Human Trafficking Statement – year ending 31st of January 2022

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Section 54 of the UK Modern Slavery Act 2015 requires OneTrust Technology Limited (“OneTrust”) to provide an annual statement on the risks of forced labour, slavery, servitude, debt bondage, child labour and human trafficking (“Modern Slavery”) in its business and supply chain and the action taken each financial year to address those risks. This statement is OneTrust’s Modern Slavery statement for the financial year ending on the 31st of January 2022.

Introduction

OneTrust believes trust is central to building sustainable businesses. As a company, we are committed to responsible and transparent business practices that uphold and protect human rights, demonstrate respect for our people, local communities, and the environment. We have zero tolerance for Modern Slavery, and will always seek to identify, address, and mitigate any actual or potential human rights violation and Modern Slavery risks in our operations and supply chain. Beyond abiding by applicable laws and regulations, our goal is to implement best practices in these areas.

Structure of OneTrust’s Operations and Supply Chains

OneTrust is a leading software-as-a-service provider, operationalizing trust for its customers through its solutions that power privacy, security, ethics and compliance and ESG programmes. More than 12,000 customers use OneTrust to build integrated programmes that comply with hundreds of the world’s privacy, security, regulatory and compliance laws, and acceptable standards. OneTrust is headquartered in London, England and operates as a subsidiary of OneTrust LLC in Atlanta, Georgia (the co-headquarters of the OneTrust group). The OneTrust group employs over 3000 employees and has additional offices in Bangalore, Denver, San Francisco, Paris, Melbourne, New York, São Paulo, Seattle, Munich, Hong Kong, and Bangkok. Please [click here](#) to find out more about our business.

Our suppliers are the businesses that provide products and services that enable us to develop, market and sell our solutions and run our business. This includes data centers, professional service providers, business process outsourcing providers and hardware and software providers. Our supply chain also includes those that provide office services and supplies, such as office spaces, cleaning and maintenance and IT equipment.

Policies, Risk Assessment and Management

OneTrust assesses its Modern Slavery risks to be generally low, particularly due to the sector in which we operate, the nature of our supply chain, and the values and policies to which all our employees are required to adhere to. To the extent that a risk of Modern Slavery, or a potential Modern Slavery incident is identified within our business or supply chain, we will investigate and deal with that incident in a professional and accountable manner. To that end, OneTrust operates a reporting hotline, and we encourage all our employees to be open and raise any genuine concerns, even if they turn out to be mistaken, knowing all reports are taken seriously, treated confidentially, thoroughly investigated and any required corrective action will be taken.

Commitments and Plans for FY 2023

The needs and welfare of our people is important to us; therefore, we confirm that we have procedures in place to comply with relevant labour laws relating to employee terms and conditions, including pay and leave. In addition, we provide a robust and flexible benefits programme to support our employees' health, social and financial needs.

We expect our suppliers to share our values, but we recognise that while we consider our business to be low risk, there are still Modern Slavery risks in our supplier chain, particularly in the higher risk jurisdictions we operate - based on the 2018 Global Slavery Index, we have identified these regions to be India and Thailand, where we have offices. We also acknowledge that prevention of Modern Slavery requires continuous efforts. Therefore, we are committed to enhancing our practices by introducing additional controls to mitigate and prevent supply chain risks and embed best practices within our business and supply chain.

During the 2023 Financial Year, we intend to take the following actions:

- Relaunching our **Code of Trust**, which includes guidance for employees on expected behaviours to prevent violation of applicable labour and Modern Slavery laws. This will be accompanied by an annual Code of Trust training and certification for all our employees and contractors.
- Implementing Modern Slavery training for employees in high-risk roles to empower them to identify risks and red flags.
- Creating a working group, which will be tasked with introducing best practice initiatives to further minimise Modern Slavery risks.
- Implementing a supply chain compliance programme which will include:
 - A supplier code of trust. The code will set out our expectations and all suppliers will be required to certify compliance with the code.
 - Conducting risk-based Modern Slavery due diligence on our direct suppliers, to help us identify areas of risk prior to engaging in business relationships and to ensure selected suppliers share our values and commitments.
 - Imposing contractual obligations on all suppliers, including obligations to comply with relevant laws (including any applicable Modern Slavery laws) and requirements to impose similar standards on their suppliers.

This statement has been read and approved by OneTrust's board of directors on the 21st of April 2022.



Ian Evans – Managing Director – EMEA

OneTrust Technology Limited