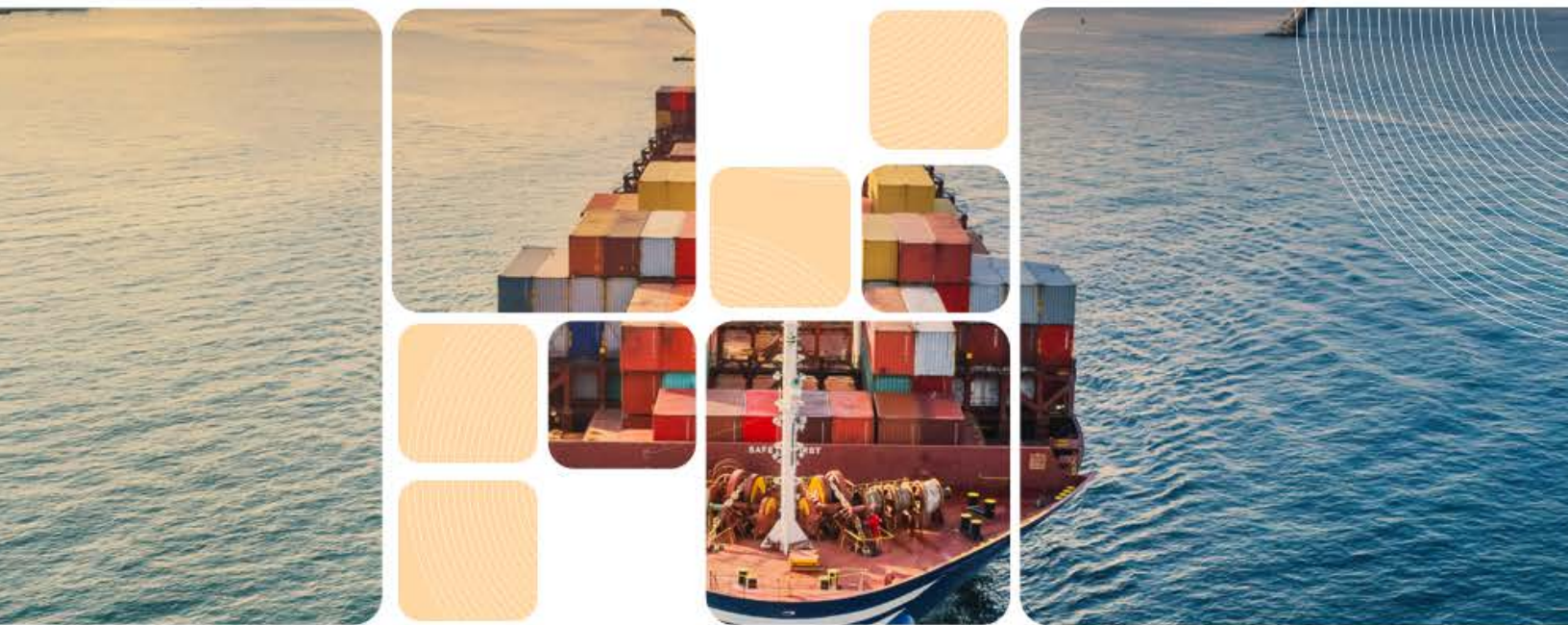


# Modern Slavery and Human Trafficking Statement

Effective April 2025

---



## 1. Introduction

This Modern Slavery and Human Trafficking Statement is made by and on behalf of Sovos Compliance, LLC and its subsidiaries ("Sovos") pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes Sovos' slavery and human trafficking statement, showing the measures and procedures taken by Sovos in order to comply with its values, principles and code of conduct, as well as with the requirements of the Act and other applicable law.

## 2. Our Business

Sovos provides businesses with the confidence needed to navigate an increasingly regulated world. Offering a modern, IT driven response to compliance, Sovos' solutions are scalable, reliable and secure and provide a great user experience. Sovos has more than 100,000 customers, including half the Fortune 500, as well as businesses of every size operating in more than 70 countries. Our SaaS products and proprietary Sovos S1 Platform integrate with a wide variety of business applications and government compliance processes. Sovos has more than 2,600 employees throughout the Americas and Europe.

Sovos has a number of policies in place to ensure all our employees have the right to work and are paid fairly, that we act with integrity and ethically, and that we have effective measures in place to ensure slavery is not present anywhere in our business or supply chain. This includes our commitment to equal opportunities in employment, which encompasses recruitment, promotion, training, performance management and reward.

Our principles of fair treatment and respect are also applied to our relationships with customers, suppliers, contractors, shareholders and other stakeholders.

As part of Sovos' commitment to carrying out business with the highest ethical standards, Sovos also has a global Code of Conduct applicable to all employees and functions.

## 3. Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Sovos is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Sovos is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards. In addition, our suppliers also go

through a due diligence procedure explained below.

This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **4. Responsibility for the Policy**

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **5. Compliance with the Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. If you believe or suspect that a conflict with this policy has occurred, or may occur in the future, or if you have concerns with working conditions or any aspect of Sovos' supply chains, notification to Sovos should occur by contacting your manager. You can also make a report via the anonymous whistleblowing hotline at [www.sovos.ethicspoint.com](http://www.sovos.ethicspoint.com) or by calling the applicable number on the website.

## **6. Supply Chain and Due Diligence**

As a business-to-business software company, Sovos does not have a complex supply chain, nor does it regularly engage with companies that manufacture products. Our service providers and suppliers are mostly well-known companies that provide technology (including hardware, software, or related services) or professional service providers (including accountants, financial service providers, law firms, and other consultants). Accordingly, while we do not perceive any high-risk companies in our supply chain, as part of our procedure, all suppliers are contractually required to:

- comply with applicable laws and regulations in providing us products and services; and
- agree to implement due diligence procedures for their own suppliers, subcontractors, and other participants, and acknowledge that neither the supplier nor any of its officers, employees, or other associates have been convicted of any offence involving slavery and human trafficking and have never been the subject of

any investigation by a regulatory body regarding any offence in connection with slavery and human trafficking.

In addition, larger suppliers and those that may have an enhanced risk go through a due diligence, where the supplier and its shareholders and/or officers are checked in advance.

Sovos will continue to monitor and engage with its supply chain in order to renew and constantly update its assessment and, if necessary, increase the due diligence and related measures taken.

Individuals at Sovos who interact with our suppliers are also trained in different areas, including with respect to compliance with the Act, in order to identify and handle risks when contracting.

## 7. Amendments

This Policy will be reviewed by Legal on a regular basis and updated from time to time, with the updated version of the Policy immediately made available on Sharepoint.

## 8. History

Version	Updates
1.0	
1.1	Removal of hotline number.

Reviewed by:

Version	Name	Occupation	Date
1.0	Romi Martin	Senior Counsel	February 27, 2024
1.1	Romi Martin	Legal Director	March 14, 2025

Approved by:

Version	Name	Occupation	Date
1.0	Justin Pentz	General Counsel	March 5, 2024
1.1	Justin Pentz	General Counsel	March 24, 2025