

Slavery and Human Trafficking Statement

For the financial year ending 2018

Our Organisation

Open Text Corporation (**OpenText**), The Information Company™, is a global software company, and the leader in Enterprise Information Management (EIM). Our EIM products enable businesses to grow faster, lower operational costs, and reduce information governance and security risks by improving business insight, impact and process speed.

Information is the most valuable commodity of the digital economy. It helps customers improve efficiencies, redefine business models and transform industries. Organizations must use new technologies to unlock the power of information, become more Intelligent and Connected through automation and artificial intelligence, APIs and data automation and drive engagement with customers, partners and employees.

EIM solutions manage the creation, capture, use and eventual lifecycle of structured and unstructured information. OpenText EIM solutions are designed to help organizations extract value from their information, secure that information, and meet the growing list of compliance requirements. We offer a suite of EIM solutions (including Analytics, Enterprise Content Management, Customer Management Experience, Digital Process Automation, Discovery and Security, as well as our Business Network solutions) to suit the business needs of our worldwide customers.

OpenText is a publicly traded company listed on the NASDAQ (OTEX) and the Toronto Stock Exchange (OTEX). With its headquarters in Waterloo, Canada, OpenText employs over 12,000 employees in more than 120 locations worldwide. OpenText launched in 1991, originally as a project out of the University of Waterloo, evolving over the next 25+ years with the shifting digital landscape, and acquiring companies and products along the way, becoming the global leader in EIM.

We strive to enrich the way people use information, foster innovation, be trusted in our relationships, be committed to excellence in all that we do, and work with our stakeholders, demonstrating honesty and passion towards common goals.

For more information on who we are and what we do, we welcome you to visit www.opentext.com.

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 (the "Act") and sets out the steps our organization has taken during the financial year ending 30 June 2018, together with the steps that we intend to take going forward, to ensure that slavery and human trafficking are not taking place in any part of our organization or throughout our supply chain.

Our Supply Chain

As a software company, OpenText neither operates in an industry, nor has an extensive range of local or international suppliers, where in each case modern slavery or human trafficking would be a material risk. We are fully committed to ensuring prevention of slavery and human trafficking in our corporate activities by promoting transparency in our organization and throughout our supply chain. Our supply chain predominantly consists of:

- suppliers of products and services used, incorporated into, or sold alongside our own product and services offerings (including facilities providers, software development, support service providers, cloud service providers, IT service providers, ICT hardware and the like)

- suppliers of products and services for marketing merchandise, ICT hardware, stationary, cleaning, catering, maintenance services, hospitality services, security and recruitment agencies
- professional services of various advisors, including external law firms, tax advisors, accountants and insurance brokers

OpenText is dedicated to conducting its business ethically and in compliance with all applicable laws. Through their dealings with our Procurement team, we require our suppliers to maintain the same standard of excellence.

Our policies and commitments

We firmly believe that our success comes from the diversity and strength of our workforce. Our people are our number one winning strategy – which is why we strive to attract and retain the very best the industry has to offer. We value and respect our employees and are committed to providing direction for and leadership to our own people through the development and support of labor guidelines, policies and practices designed to benefit both individuals and the organization. OpenText encourages the organizations it does business with to follow these principles and respect the privilege and responsibility to uphold them as employers.

OpenText strives to create an environment based on respect for individuals and their needs, recognizing that a culture based on mutual respect is conducive to higher levels of productivity, teamwork and collaboration. We support an “employment equitable” work environment, free from discrimination of any kind. All employees share in this responsibility. Our working environment will, at all times, be supportive of the dignity and self-esteem of its employees.

We are an equal opportunity employer and believe that a diverse workforce has significant positive results in attracting and retaining talent. Our Employment Equality & Diversity Policy is available upon request.

We are confident we offer our employees a competitive compensation package and attractive benefit plans. Our recruitment procedures include employment eligibility and, where applicable, background checks, in order to verify education, employment history and residential status.

Trust is one of our core values, and to maintain our company’s position as a market leader, it is crucial for us to earn the trust of our customers, our employees, our investors, and the communities in which we operate. We are committed to complying with all applicable laws and regulations, and employees are not only expected to obey all applicable laws and regulations, but also to conduct themselves with integrity and respect. Our [Code of Business Conduct and Ethics](#) explains how we can do our part in achieving these objectives, and all employees, officers, directors, vendors, contractors and partners are expected to conduct themselves in a manner consistent with our Code of Business Conduct and Ethics.

Additional OpenText policies and procedures include the following:

- Anti-corruption
- Global information security
- Workplace harassment and discrimination
- Occupational Health and safety
- Respect in the Workplace
- Whistleblowing
- Grievance and disciplinary

It is important to us to maintain a workplace in which the company can receive, retain and address concerns regarding any matter governed by the Code of Business Conduct and Ethics. Employees, officers and directors are encouraged to raise such concerns on a confidential basis, free from discrimination, retaliation or harassment, anonymously or otherwise, to our global compliance officer.

As part of the OpenText Board governance process, we regularly discuss, and where required revisit, our Code of Business Conduct and Ethics to make sure it stays up to date with applicable legislation worldwide, including the Act.

Social Responsibility and Sustainability

OpenText is committed to working toward sustainability in our operations and meeting the social and environmental expectations of our stakeholders. We are a signatory to the United Nations Global Compact. Our business operations are conducted in ways that respect human rights, support our workforce, and interact with our clients and suppliers with integrity.

The foundations of our Corporate Social Responsibility Program align with our corporate values: to foster trust with our customers, employees, partners, and shareholders; demonstrate excellence; continually innovate; cultivate the company as the best place to work; and to ensure our customers are successful. Our Corporate Social Responsibility Program is modelled on the seven social responsibility core subjects of the International Organization for Standardization Guideline for Social Responsibility (ISO 26000). These core subjects are:

- Organisational Governance
- Community Involvement and Development
- The Environment
- Human Rights
- Labour Practices
- Fair Operating Practices, and
- Consumer Issues.

Our Suppliers are expected to behave responsibly and ethically and must comply with applicable laws and regulations. Our [Supplier Code of Conduct](#) outlines the standards that we expect our suppliers to meet. Our Suppliers are to have in place effective policies and procedures to manage ethical issues within their supply chain including, but not limited to, all labor-related processes.

Our supplier agreements make clear that suppliers must provide goods and services in accordance with our Supplier Code of Conduct, and that all OpenText policies and procedures must be adhered to. Where our agreement is not utilised, we include our own language requiring the supplier to adhere to our Supplier Code of Conduct.

Our new [Sustainable and Ethical Procurement Policy](#) provides details on the expectations of our suppliers and subcontractors to operate in a manner that is both ethically responsible and sustainable. Expectations also relate to environmental responsibility, cultural practices, and supplier relationships based on the highest level of integrity, ethical standards, and fair and honest dealings.

We are currently updating our PO terms and conditions to include our Supplier Code of Conduct and Supplier Site requirements, together with ensuring that assessment of our current and prospective suppliers is carried out. We are actively working with our business unit stakeholders and compiling a plan that will enable us to consider individual requirements in relation to the prevention of slavery and human trafficking within our different service types. We expect to have finally completed these important projects by the end of our financial year 2019.

To the best of our knowledge, slavery and human trafficking do not exist in our organization or our supply chain. Nevertheless, we will continue to review and monitor our systems and controls in order to identify any potential risk areas and remain committed to updating our corporate and procurement policies, procedures and agreements in light of the Act.

Staff Training

As a publicly traded, global company, employees are requested to complete a number of mandatory compliance training courses as a result of industry, regional or corporate requirements, and to familiarise themselves with our corporate policies and procedures. In particular, all employees must complete annual business conduct and ethics training.

This statement is published on behalf of Open Text UK Limited and was approved by the board of directors of Open Text UK Limited on 11 February 2019.



Gordon A. Davies

Director

Executive Vice President, Chief Legal Officer and Corporate Development