



# Modern Slavery Statement

## 1. Introduction

This Modern Slavery Statement (“the Statement”) for NuiX Limited covers the period of 1 July 2023 to 30 June 2024 (“Reporting Period”).

This Statement applies to NuiX Limited and all group-controlled entities. 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 be a Force for Good by finding truth in the digital world, and this is underpinned by our values 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 ultimate and parent entity of the NuiX Group and, as at 30 June 2024, has 9 entities across Australia, the United States, Ireland, the United Kingdom, the Philippines 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 Annual Reports. All entities in the NuiX Group follow policies set by NuiX Limited.

### Our operations

NuiX is a leading provider of investigative analytics and intelligence software, we empower our customers to be a 'Force for Good' by finding truth in the digital world. Our cutting-edge software is trusted by law enforcement, legal firms, and corporations to transform vast amounts of unstructured data into actionable insights with speed, scalability, and forensic accuracy.

NuiX is used by many of the world's leading corporations, regulators, governments, law firms, advisories and service providers who rely on our software to assist with challenges as diverse as criminal investigations, data privacy, eDiscovery, regulatory compliance and insider threats.

NuiX is headquartered in Sydney, Australia and had a headcount of 422 at 30 June 2024. Employees collaborate through 4 key client-facing hubs in Sydney, Washinton DC, London and Frankfurt. NuiX has employees in 13 countries across the Americas, Asia-Pacific and EMEA. The majority of our staff footprint is in the Americas (49%) and Asia-Pacific (37%). Additional information on our activities, performance, products, and services can be found in our annual report and on our website [www.nuix.com](http://www.nuix.com).

### Our Corporate Values

We are in the business of making a positive impact on the world, and we want to be a company that our colleagues, customers, and community can be proud of.

We strive to foster a customer-collaborative and innovative culture through a talented team of employees who are motivated to build software with purpose and assist our customers to contribute to a wider public and social good.



We have five core values that guide us at NuiX. They're our truth, and they underpin everything we stand for which includes our approach to modern slavery and human rights risks and 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

Based on our industry, business model, procurement profile and geographical footprint, we have assessed the overall risk that we cause, contribute to, or are directly linked to modern slavery as low.

We have assessed the risk of modern slavery within our direct business operations as low, given the relatively low outsourcing and consequent level of control we have on our operations and our comprehensive labour management controls.

We have assessed the overall risk of modern slavery practices in our supply chain as low. This assessment is based on the geographical footprint of our suppliers and the types of services and products we procure. Our procurement generally consists of technology, professional services, recruitment and labour hire, marketing, and facilities management expenditures.

We recognise that we may have indirect exposure via extended supply chains – for example, suppliers we purchase electronics from. We have assessed these vendors and identified no red flags.

#### Our Supply Chain

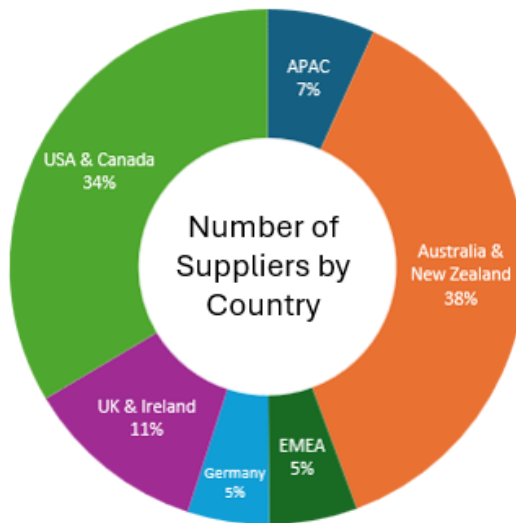
During the period, we transacted with approximately 500 suppliers across 25 countries. More than 98% of our procurement spend was with suppliers in countries deemed lower risk for modern slavery prevalence and vulnerability according to the Global Slavery Index 2023. Where NuiX engages with suppliers in countries deemed higher risk, the category of the products or services being procured is lower risk.

The Global Slavery Index flags electronics (laptops, computers, and mobile phones) from China and Malaysia as products at risk of modern slavery. Whilst NuiX does have significant technology spend, no electronics are procured directly from China, Malaysia or other countries deemed higher risk.

NuiX procures property management services, which indirectly include facilities management services (e.g., cleaning, maintenance, and security). These types of services are deemed as higher risk for labour exploitation.

In FY24, NuiX made a change to its software engineering operations through a partnership with a global technology company headquartered in India. This partner provides engineering resources to enable NuiX to deliver on its software quality engineering requirements. We recognise that India has a higher potential risk or worker exploitation than some other countries. Our partner has a modern slavery policy and public zero tolerance commitment to all facets of modern slavery. Given this and the nature of the services provided, we have assessed the modern slavery risk as low.

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.



**+98% of vendor spend is with entities based in lower risk countries**

**Legend:**

APAC: China, Hong Kong, India Japan, Korea (Republic of), Philippines, Singapore.

EMEA: Austria, Czech Republic, France, Italy, Netherlands, Poland, Spain, South Africa, Switzerland, Ukraine, United Arab Emirates

## 4. How NuiX has addressed its Modern Slavery Risks

### Our employees

NuiX uses reputable recruitment agencies and Employer of Record (EOR) providers when sourcing and engaging employees who are required to comply with the relevant labour laws in each of the 13 countries in which NuiX has direct employees, contractors or staff engaged via EORs.

NuiX has strong processes in relation to the recruitment, onboarding and rewarding of all our direct employees. 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.

### 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

These 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. We also conduct background checks on incoming employees, as permitted by applicable law. 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 chain

Nuix has a consistent and conservative approach to contracting with new suppliers which is aimed at guarding against and pinpointing risk with such suppliers.

Due diligence is completed for all new vendors. This includes a 3<sup>rd</sup> party due diligence questionnaire with modern slavery questions and interrogation of a 3<sup>rd</sup> party intelligence database to identify any adverse media and modern slavery red flags. Nuix has a standard vendor agreement which includes modern slavery commitments. An annual independent review of all vendors for modern slavery risks is also performed.

Where Nuix enters new material arrangements with 3rd party service providers, appropriate due diligence is performed as part of the selection process and financial and non-financial risks are assessed.

## Our Partner Network

Nuix has several different types of partners including resellers, distributors, advisories and service providers, integration partners, training partners and original equipment manufacturing partners. Nuix expects all its Partners to perform their work with honesty, truthfulness, and integrity.

# 5. Recent developments and looking forward

## The Past Year

We have not been made aware of any allegations of human trafficking / slavery 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 and customers. In the Reporting Period, we achieved the following:

- We implemented a 3<sup>rd</sup> party recruitment and employee background checking system
- We conducted due diligence and assessed modern slavery risks when engaging with material outsource providers
- We conducted a review of our vendors to assess for modern slavery red flags
- We updated our standard vendor agreements to include a Modern Slavery clause

## The Year Ahead

We are committed to continuously monitoring 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 2025 we aim to have:

- Reviewed and updated our Code of Conduct
- Made improvements to our procurement and vendor due diligence processes

# 6. Consultation and Board Approval

All Nuix entities operate under a common set of governance and risk management policies and programs. This includes the policies and programs through which modern slavery and human rights risks are assessed and addressed. This Statement has been approved by the Nuix Board in consultation with relevant stakeholders and circulated to the directors of Nuix Limited for comment prior to its formal approval by the Board on 16<sup>th</sup> December 2024

A handwritten signature in black ink, appearing to read 'Jonathan Rubinsztein', is positioned above the printed name.

Jonathan Rubinsztein

Nuix Limited Group CEO and Managing Director

16<sup>th</sup> December 2024