

Epicor Global Anti- Slavery & Anti- Human Trafficking Policy

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1.0 Purpose

Epicor Software Corporation and its international affiliates (together “Epicor”) is committed to ensuring transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains and work environment consistent with our disclosure obligations under the Modern Slavery Act 2015, which is applicable to our business operations in the United Kingdom; the Modern Slavery Act 2018 (Cth) which is applicable, on a voluntary basis, to our business operations in Australia; and the requirements of US Federal Acquisition Regulation Subpart 22.17 and 52.222-50, which is applicable to our business operations in the United States of America.

Regardless of the countries that have, so far, enacted legislation to combat modern slavery and human trafficking, Epicor will not, and does not, tolerate or condone modern slavery or human trafficking in any part of its organization or business relationships, regardless of where in the world the organization is located; nor where the business relationship is conducted. Modern slavery and trafficking in persons is an international crime involving the acquisition of a human being through the use of force, fraud or coercion, or in which the person induced to perform such act has not attained 18 years of age, for the purpose of exploiting the individual, adult or child, for profit through forced labor, prostitution or both. It constitutes a violation of human rights in which the victims are deprived of their fundamental freedoms.

This Policy is consistent with Epicor’s Worldwide Code of Business Ethics and Conduct, a copy of which is accessible by all employees from EpicNet and further complies with the requirements of the UK’s Modern Slavery Act 2015; Australia’s Modern Slavery Act 2018 (Cth); as well as the Federal Acquisition Regulation Subpart 22.17 and 52.222-50.

2.0 Scope

The Policy applies to all personnel employed by or engaged to provide services to Epicor, including, but not limited to, employees at all levels, officers, directors, temporary employees, contingent workers (including agency workers), casual staff, seconded workers, volunteers, interns, external consultants, third party representatives, business partners and independent contractors (collectively herein referred to as “employees”). Every Epicor employee, regardless of where they are located in the world, is responsible for reading, understanding and complying with this Policy.

This Policy does not form part of any employee’s contract of employment and we may amend it at any time.

3.0 Responsibility for this Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The compliance team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Legal team at: L-LegalPersonnel@epicor.com

4.0 Policy

The United States, the United Kingdom, Australia, as well as a number of other countries, have enacted laws prohibiting modern slavery, human trafficking and trafficking-related activities. Pursuant to law and Epicor Policy, forced, bonded (including debt bondage) or indentured labor, commercial sex, involuntary prison labor, slavery, or trafficking of persons shall not be used or tolerated. This includes transporting, harboring, recruiting, transferring or receiving persons for labor or services by means of threat, force, coercion, abduction or fraud for the purpose of involuntary servitude, peonage, debt bondage or slavery.

5.0 Compliance with this Policy

You must ensure that you read, understand, and comply with this Policy.

The prevention, detection and reporting of modern slavery and human trafficking 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. As required by law, and pursuant to this Policy, Epicor, its employees, contractors, subcontractors, agents, vendors, suppliers, partners and others through whom Epicor conducts business, shall not:

- Engage in any form of trafficking in persons during the performance of the contract;
- Procure commercial sex acts during the performance of the contract;
- Use forced labor in the performance of any work related to the contract;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key items and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided or arranged by Epicor or its agent), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charge applicants/candidates/employees recruitment fees;
- If required by law or contract, fail to provide return transportation or fail to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, fail to provide or arrange housing that meets the host country housing and safety standards; or

- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five (5) days prior to the employee relocation. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

6.0 Reporting

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this Policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblower Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or anonymously through EthicsPoint by going to the website online at www.ethicspoint.com or by telephoning anonymously to 1-866-384-4277. Employees who fail to report actual or suspected human trafficking (when there are reasonable grounds to believe it exists) may be deemed in violation of this Policy as permitted by applicable law. Employees may also report potential human trafficking violations to the U.S. State Department's Global Human Trafficking Hotline directly at 1-844-888-FREE (3733).

No discrimination or retaliation against any person who, in good faith, reports a suspected violation of this Policy will be tolerated. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment (which includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern) or retaliation as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Anyone who retaliates against an individual under such circumstances will be subject to disciplinary action, up to and including termination of employment.

If you believe that you have suffered any such treatment, you should inform the Legal Team immediately at LegalPersonnel@epicor.com. If the matter is not remedied, and you are an employee, you should raise it formally using the applicable Grievance Policy for your country, a copy of which can be found at Epicor's Corporate Policies site: <http://epicnet/CorporatePolicies/Forms/AllItems.aspx>

7.0 Investigations and Audit

Epicor may perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Epicor employees and third parties through whom Epicor conducts business are required to fully and promptly cooperate with any auditors and investigators and must respond fully and truthfully to any inquiries and requests for documents. Any failure to fully cooperate or hinder an investigation or audit may be grounds for disciplinary action, up to and including termination, subject to applicable law. Further, if at the conclusion of our investigation or audit, it is determined that a violation of this Policy has occurred, Epicor will take appropriate remedial action commensurate with the severity of the offense. This action may include disciplinary action against the accused party, up to and including

termination of employment or business with Epicor. Reasonable and necessary steps will also be taken to prevent any further violations of the policy at issue.

8.0 Revision History

Date	Contact	Description
06/2019	Vince Lowder, Legal	Policy Issuance
08/2020	Dawn Kitt, Legal	Merged UK Policy and US Policy to create a global policy
02/2021	Legal Department	Updated Policy and Branding