

## **MODERN SLAVERY STATEMENT**

Modern slavery and human trafficking are crimes against and violations of fundamental human rights. Collibra and all its subsidiaries oppose all forms of slavery, including human trafficking, drug trafficking, sex trafficking, forced, unpaid and child labour, and exploitative working conditions within our own business operations and in our value chain. Collibra is committed to ensuring we have zero occurrences of modern slavery in our business activities in each year of our operations, and we implement policies and procedures intended to ensure no modern slavery activities are taking place in our business.

We make this statement to set out the steps that Collibra takes to adhere to the requirements of the Modern Slavery Act 2015 and to reflect a drive to eradicate modern slavery in commercial organizations within our supply chain.

### Our business and organisational structure

Collibra is an international data intelligence software platform provider. Our platform and solutions enable organizations to unify their data so that it is easy to find, understand, trust, and access. We continually innovate our platform and build new features that help all our users, partners, and customers manage and govern their data more effectively.

Our customers are typically medium to large-scale enterprises with diverse data management needs. We also partner with leading technology companies to deliver our solutions to customers.

We are headquartered in New York and Brussels, have offices in the United States, Belgium, Czechia, and the United Kingdom, and a material sales presence across Europe and North America. As a growing company, Collibra does not structure its engineering, product development, administrative, or executive teams regionally. Our sales operations are, however, organised by geographic region.

Our business is supported by a technical infrastructure, including cloud service providers and data centers located predominantly in the U.S. and Europe. We also rely on suppliers to manufacture and distribute electronic IT equipment that we use in our own operations.

## Our supply chain

We work with suppliers based in many different countries. Our supply chains include, but are not limited to, infrastructure providers and back office operational support services, and consist mostly of medium to large-scale enterprises with their own sophisticated compliance programs.

### Our policies addressing ethical conduct and the prevention of modern slavery

We are committed to conducting our business operations ethically. Collibra has a zero-tolerance policy to prevent slavery and human trafficking from occurring within our business and supply chain.

Collibra has taken steps to identify and assess the risks in relation to slavery and human trafficking within our business and supply chain in line with our industry sector. These steps include the adoption of internal policies and procedures to ensure awareness of and compliance with our zero-tolerance position on modern slavery and human trafficking:

- Our <u>Code of Business Conduct and Ethics</u> requires that our employees and members of our extended workforce abide by all applicable laws, including those preventing modern slavery. Every employee and member of our extended workforce receives annual training on the Code.
- We require all our suppliers to follow our <u>Supplier Code of Conduct</u>, which prohibits modern slavery, and to comply with all applicable laws, including those combating modern slavery and human trafficking, such as the Modern Slavery Act 2015 (UK).
- This Modern Slavery statement reflects our commitment to acting ethically and with integrity in our business
  relationships, and to implement and enforce effective systems and controls to ensure that slavery in any form is
  not taking place in our supply chains.



- Our global <u>supply chain risk management procedures</u> provide strong due diligence, oversight, and management of our material third-party relationships.
- Our global <u>whistleblowing</u> mechanism enables employees, partners, and suppliers to report concerns about actual or potential misconduct, criminal offences, and non-compliance with applicable laws, regulations, and internal policies through a confidential third-party.
- We maintain a substantial range of <u>employment policies</u> designed to ensure all employees are treated with fairness, dignity, and respect, and which foster an environment that is free from discrimination, harassment, and any form of forced labour. Our commitment to respecting <u>human rights in the workplace</u> is also embedded within our Code of Business Conduct, Employee Handbooks, and Fair Recruitment practices.
- We recognise that modern slavery and corrupt practices are often interlinked. Our zero-tolerance global <u>anti-</u> <u>corruption policy</u> strictly prohibits all forms of bribery and corruption, regardless of whether they involve a public official or a private person. This also includes the procedure that employees must adopt when "red flags" are encountered during due diligence or ongoing business relationships.
- We conduct annual <u>training on ethics, anti-bribery, anti-corruption, fraud, and money laundering</u>, which is
  required for all employees and contractors.

We hold our employees and suppliers to high standards. Any violation of our standards by an employee can result in disciplinary action, including termination of employment. Any violation by a supplier or member of our extended workforce can result in contract or engagement termination.

### Reporting concerns or raising issues related to modern slavery

Collibra takes a zero-tolerance approach to any form of retaliation against whistleblowers. We offer multiple reporting options to all our employees and members of our extended workforce, including a confidential Whistleblowing mechanism that gives the option to report concerns anonymously, including on modern slavery. We promote this reporting channel through our internal policies, communications, and training. Employees can also raise their concerns to our General Counsel. All concerns within the scope of our Whistleblowing procedure are investigated in a fair, unbiased, and confidential manner. Our whistleblowing policy provides protections against retaliation for those who use this mechanism.

#### Supplier due diligence and risk assessments

We conduct due diligence on suppliers before we enter into any commercial agreements. Our due diligence process involves assessing suppliers for key risks. In certain cases, we may decide not to pursue a relationship or to terminate our current relationship with a supplier if any risk we identify raises a "red flag" or is not mitigated within an agreed-upon timeframe.

In addition, we assess the risk of modern slavery in our supply chains and the effectiveness of our policies through periodic assessments. Collibra's Governance, Risk and Compliance (GRC) team establishes Collibra's risk universe, which helps drive how our control environment is performed, followed, and maintained by (i) developing and enforcing policies, procedures and issue management processes, (ii) facilitating the remediation of issues identified during assessments, and (iii) implementing necessary training and awareness programs.

#### Internal governance and accountability

Supplier due diligence, including Modern Slavery risk, is the joint responsibility of our Procurement and GRC teams, both of which report to the CFO. The Audit Committee of our Board of Directors provides oversight over Collibra's risk management procedures.

## Training

All employees and members of our extended workforce are trained on our Code of Business Conduct and Ethics. Such training includes business ethics, anti-corruption, and anti-bribery best practices. Our procurement team is trained on matters material to the supply chain, including fraud detection and prevention, and ethics.



### **Next steps**

We remain committed to improving our efforts to address modern slavery risks in our business and supply chains. We will continue to review and develop our supply chain due diligence and risk assessment procedures across our operations to ensure a robust and consistent approach to prevent slavery and human trafficking risks. To the extent such risks or actual violations are identified, we will implement all appropriate actions to eliminate them, including ceasing trading with suppliers if necessary.

# **Board approval**

This statement was approved by our Board of Directors and signed on its behalf by our Chief Executive Officer.

Felix Van de Maele Chief Executive Officer April 24, 2025

## **Document revisions**

Document Owner	Document Effective Until Date	
Frank Wu, Associate General Counsel	May 30, 2026	
Revision history		
Date	Approvers	Changes
April 24, 2025	Amanda Weare, General Counsel Dana Bishara, Chief People Officer	Updates to reflect current operations. Addition of policy details, description of whistleblowing mechanism, risk assessment procedure and governance.