



DIGITAL.AI STATEMENT AGAINST HUMAN TRAFFICKING, MODERN SLAVERY, AND CHILD LABOR

Digital.ai. does not tolerate or condone trafficking of persons or the use of child or forced labor.

Digital.ai fully supports the elimination of human trafficking, modern slavery, or other forced or child labor from the supply chain, and it intends to comply with the California Transparency in Supply Chain Act of 2010 and the United Kingdom’s Modern Slavery Act of 2015.

As such, Digital.ai has drafted written and published this statement against human trafficking, modern slavery, and child labor. This statement is designed to assure others of Digital.ai’s commitment to eradicating these deplorable practices and to detail the appropriate, risk based actions it is taking to ensure that human trafficking, child labor, or any form of forced or compulsory labor are not taking place in its supply chain or in any part of the Company’s business.

Digital.ai’s Structure, Business, and Supply Chain

Digital.ai is a global technology company focused on software creation and delivery headquartered in the United States, along with having employees in several countries around the world, including in Europe, Middle East and Asia. Digital.ai develops, markets and sells its software products and related professional services to companies worldwide.

Digital.ai employs a technically skilled, professional labor force. The Company’s employees are voluntary, “at will” employees or independent contractors who receive competitive compensation and benefits. Digital.ai attracts the majority of its workers directly through recruitment or employment postings and does not extensively use labor brokers or other third parties.

Digital.ai does not manufacture, produce, or distribute hardware or physical goods. Digital.ai’s supply chain consists of professional services, computing services, retail and promotional items, office supplies, event planning and marketing, and the leasing of facilities such as office space or data centers.

Risk Assessment

In light of its business and supply chain, Digital.ai poses a low risk of facilitating human trafficking, modern slavery, or child labor. Digital.ai has analyzed its supply chain and determined that its most relevant risk areas would be associated with utilizing suppliers for physical goods or for event support, construction, facilities, or related travel services that could potentially use forced or child labor to provide these goods or services. The Company’s management team is not aware of any actual or alleged human trafficking, modern slavery, or child labor in its business or supply chain, and it has no credible basis to believe such practices are occurring.

General Policies and Procedures



Digital.ai's Code of Conduct prohibits the knowing use or support of forced or child labor in its business operations. Any Digital.ai employee or independent contractor who violates this prohibition will be subject to discipline, up to and including termination.

Digital.ai is also committed to fair and reasonable labor practices. Digital.ai has policies and procedures in place to ensure that it timely pays its employees and contractors a competitive, fair wage; maintains humane and safe working conditions; and does not illegally require workers to exceed maximum hours of daily labor as set by local or national laws or regulations. Digital.ai does not engage in physical abuse or discipline for its workers and does not tolerate harassment or unlawful discrimination in the workforce or workplace.

Digital.ai maintains a risk-based compliance program designed to ensure compliance with applicable laws and foster a culture of ethics and integrity. Digital.ai provides employees and contractors with multiple ways in which to raise ethical concerns or concerns regarding a violation or potential violation of laws, regulations, and standards, including a compliance hotline that allows for anonymous reporting. Digital.ai also has a stated policy against retaliation, and any employee who engages in retaliatory conduct faces discipline up to and including termination.

Supply Chain Due Diligence, Verification, Auditing, and Certification

Digital.ai has made all of its employees engaging in procurement aware of this policy. Digital.ai expects that, before contracting with suppliers, those Digital.ai employees will review the supplier's reputation, background, and time in business and consider whether the supplier poses a risk for human trafficking, modern slavery, or child labor violations. If Digital.ai determines that the supplier poses a heightened risk, Digital.ai will avoid using the supplier or subject the supplier to additional risk assessment and oversight to ensure compliance with internal controls and applicable law.

Digital.ai requires suppliers involved in a significant portion of business to sign a written contract. Digital.ai is taking steps to incorporate provisions into its supplier contracts requiring its suppliers to commit to the following:

- not using, participating in, or supporting modern slavery or child labor
- not utilizing misleading or fraudulent recruitment or engagement practices for employees or contract workers
- not charging employees or contract workers recruitment or engagement fees
- not denying employees or contract workers access to identity or travel documents

Digital.ai is seeking to add further provisions requiring suppliers to certify their compliance and informing suppliers that it may terminate its contract with them if it learns they have engaged in modern slavery or child labor offenses.



In light of its minimal risk profile, Digital.ai does not use a third party to verify that its supply chain is free from human trafficking and slavery.

Training

Digital.ai will publicly post this statement on its website and communicate this statement to its employees, contractors, and significant suppliers, including any third-party recruiting or employment agencies.

Digital.ai will address human trafficking and modern slavery as part of its overall training on its Code of Conduct and ethical behavior.

Digital.ai may develop specific training in the future should its risk profile increase.

Digital.ai's Board of Directors approves this Statement.

Stephen Elop

Stephen Elop

Chief Executive Officer and Board Member