

### 1. Introduction

Optimizely, as a global organization, maintains relationships with many different entities in its supply chain, partners, and customers, as well as directly employing large numbers of people.

The Optimizely group of companies (“**Optimizely Group**”) has a zero-tolerance approach to modern slavery both within the Optimizely Group and within its supply chain.

We review our compliance and risk management processes against applicable laws to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our group businesses or in our supply chains, partner and customer networks.

The policy below underpins our approach and will be used to inform our annual Statement on Slavery and Human Trafficking (“Policy”).

Our Code of Conduct (which can be found on here: <https://www.optimizely.com/trust-center>) and this Policy, states that Optimizely respects fundamental human rights and is committed to the principles set out in the United Nations Universal Declaration of Human Rights.

We support and respect the protection of human rights within our sphere of influence, in particular the effective elimination of compulsory labor and child labor.

The Code of Conduct and this Policy governs all our business dealings and the conduct of all persons or organizations with whom we contract directly or who we appoint to act on our behalf.

This Code of Conduct and this Policy applies to all Optimizely Group operations and employees. Optimizely expects equivalent standards of conduct from all persons acting on its behalf, such as suppliers, partners, customers, and agents.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same respect of such measures of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is: zero tolerance.

### 2. Purpose

**2.1** Modern slavery is a criminal offence under the laws of the countries where the Optimizely group is headquartered and has subsidiaries.

**2.2** Modern slavery can occur in various forms, including servitude, forced or compulsory labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

**2.3** This document sets out the policy of Optimizely Group with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain.

**2.4** Optimizely Group has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

**2.5** Optimizely Group is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. [Company name] will not tolerate or condone human trafficking or slavery in any part of our global organization.

2.6 Optimizely Group's employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom [Company name] conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

### 3. Scope

3.1 This Policy applies to all personnel employed by or engaged to provide services to Optimizely Group including, but not limited to, employees, officers, and temporary employees of the Optimizely Group and its U.S. and international subsidiaries, and independent contractors (for ease of reference throughout this policy, "Employees").

3.2 Every Employee is responsible for reading, understanding, and complying with this policy or completing equivalent training material. Optimizely managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them.

### 4. Steps for Prevention of Modern Slavery

4.1 Whilst recognizing our legal obligations to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organizations in our supply chains. To underpin our compliance with practical steps, we have implemented the following measures:

- conducting risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas (supplier assessment on modern slavery is part of Optimizely's vendor assessment and management program);
- performing supplier pre-screening (as part of our tender process) and self-reporting for our suppliers on safeguarding controls.

### 5. Responsibility for the Policy and Awareness

5.1 Ultimate responsibility for the prevention of modern slavery rests with the Executive Leadership Team of the Optimizely Group- who has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

5.2 Managers 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.

### 6. Actions to Report Modern Slavery or Human Trafficking

6.1 Internal - Employees are encouraged to raise any concerns about suspected modern slavery associated with the Group or our suppliers – please see Optimizely's Whistleblower Policy for details on how to report a concern.

6.2 External - Members of the public or people not employed by the Group to write, in confidence, to the General Counsel and Secretary (via e-mail: [integrity@optimizely.com](mailto:integrity@optimizely.com)) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

## 7. Breaches of this Policy

7.1 If an issue is identified with a supplier, partner or customer, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

7.2 We reserve the right to terminate our relationship with individuals and organizations in our supply chain if they breach this policy.

## 8. Communication and Awareness of this Policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 9. Measuring Effectiveness - Key Performance Indicators

We have committed to reviewing our Anti-Slavery and Human Trafficking Policy annually and more frequently if circumstances require it. To help measure compliance and the effectiveness of the policy and, through that, our progress in preventing modern slavery and human trafficking from taking place in our business and supply chains, we use a number of key performance indicators (KPIs) to monitor:

- % of employees completing Anti-Slavery and Human Trafficking training
- Number of Supplier Review Negative Findings
- Number of Whistleblower Events

## 10. Annual Statement

This Policy is published as Optimizely Group's annual statement under applicable laws.

## 11. Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy shall be reviewed by the Group's Executive Team on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published annually.

## 12. Definitions

- ***applicable laws*** - includes the laws of the United States prohibiting human trafficking, sex trafficking, forced labor, and trafficking-related activities in persons (48 CFR § 52.222-50), the laws of states of the United States, the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the laws of other countries that are applicable to Optimizely Group and its operations.
- ***human trafficking*** - is used to refer to the recruitment or movement of people for exploitation by the use of threat, force, fraud, or the abuse of vulnerability.

- **modern slavery** - is used to refer to the recruitment, movement, harboring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation,
- **Optimizely Group** refers to the Optimizely North America Inc. (*formerly*, EPiServer Inc.), Optimizely Operations Inc. (*formerly*, Optimizely, Inc.), Optimizely AB. (*formerly*, EPiServer AB) and their respective US, UK, European, Australian, Vietnamese and Singapore subsidiaries.

This Policy has been approved by members of the Senior Leadership Team on 16-July-2024

13. **Owner**

<b>Owner(s)</b>	
Compliance and Legal Teams	

14. **Approval**

<b>Approver</b>	<b>Job Title</b>
Christopher Bayliss	SVP, General Counsel

15. **Review**

<b>Reviewer(s)</b>	<b>Job Title</b>
Philip Keel	Director of Compliance & Risk

16. **Revision History**

Version	Description	Date
2.0	Annual revision.	16-July-2024
1.0	Version number updated to align with number in OneTrust Annual review	27-Mar-2023
00.02.00	Annual review – no changes	7-May-2021
00.01.00	Initial version	10-Feb-2020