

ELLUCIAN'S STATEMENT AGAINST MODERN SLAVERY

At Ellucian, we take all possible steps to combat and prevent slavery and human trafficking.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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. We have a zero-tolerance approach to modern slavery and are fully committed to preventing modern slavery and human trafficking in our business activities.

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains. This is Ellucian's global statement on modern slavery and is consistent with the UK Modern Slavery Act 2015.

Our Business

Ellucian is a provider of software solutions and services to higher educational institutions. Ellucian's headquarters is located in Reston, Virginia, USA.

The Ellucian companies have approximately 3,000 employees worldwide and operates in 50 countries. The Ellucian companies are governed by Ellucian Company L.P., which employs the Ellucian Officers, including the CEO and her direct reports (Ellucian US). Ellucian US in turn, through subsidiaries, controls Ellucian facilities around the world, including in India, the United Kingdom, Ireland, Australia, UAE, Mexico, and several locations in South America. For the purposes of this statement, any reference to "Ellucian" is a reference to each and every company within the Ellucian group of companies, as the values set out in this statement are adhered to by all of Ellucian, regardless of geographic location.

Ellucian's Values

Ellucian's values unite us and guide us as we help higher education institutions achieve student success. They are:

- Lead
- Innovate
- Grow
- Humanize
- Transform

We require everyone that works for Ellucian to respect these values, which ensure that we respect all individuals and that we comply with all laws (including the Modern Slavery Act).

Our Policies on Slavery and Human Trafficking

We are committed to leading with integrity in all of our business dealings and complying with laws. Many of our existing policies are aimed at ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have approximately 1,000 suppliers predominantly providing Software as a Service solutions, cloud computing services, information technology equipment, and professional services such as consulting, staffing, and auditing. The majority of these suppliers are in the United States and Ellucian sees the modern slavery risk of this supply chain as low. Our relevant policies include:

- **Employee Code of Conduct:** [Ellucian's Code of Conduct](#) makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct:** Ellucian is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's [supplier code of conduct](#) will lead to a full review and may result in the termination of the business relationship.
- **Recruitment/Agency Workers:** Ellucian uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Our Measures to Prevent Modern Slavery and Human Trafficking

We take action to ensure that modern slavery is not taking place in our workplace or in our supply chain, including by:

- **Providing Training to All Employees.** As noted above, Ellucian maintains a global Code of Conduct. In creating the Code, Ellucian considered many different standards relating to the ethical and humane treatment of people. All Ellucian employees are trained on the Code of Conduct upon hire and periodically provided refresher training thereafter.
- **Providing Awareness to All Employees.** As noted above, Ellucian maintains a global Code of Conduct. All Ellucian employees are made aware of the Code of Conduct upon hire, and it is readily available on our intranet.
- **Conducting Due Diligence on Suppliers.** The software business sector is not considered most at risk and Ellucian does not have intricate supply chains, multiple levels of contracting and subcontracting or partnerships with businesses based in impoverished regions of the world where labour laws are non-existent or not enforced. Suppliers and business partners are subject to various forms of vetting, including the verification of information provided to Ellucian, and selective due diligence exercises will be performed, depending on the significance of the business partner to the continuity of Ellucian's business.
- **Requiring Supplier Adherence to Our Values and Ethics.** To ensure all those in our supply chain and contractors comply with our values, including our zero-tolerance approach to modern slavery and human trafficking, we enter into appropriate partner agreements with all our suppliers and partners. As part of this, we expect all our suppliers and partners to comply with all applicable laws (including the Modern Slavery Act) and our Supplier Code of Conduct.
- **Monitoring.** We encourage our employees, suppliers, and partners to submit reports relating to violations of our Codes of Conduct or applicable laws to our Alert Line, hosted by a third-party hotline provider.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Ellucian's modern slavery and human trafficking statement for the financial year ending 31 December 2023.

Executive Team approval

This statement has been approved by the Executive Team, who will review and update it annually and approve it at the applicable Board Meeting.

Signed:

Harshan Bhangdia
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Harshan Bhangdia, Sr. Vice President

Date: Feb 13, 2024