

# Modern Slavery Statement

## Modern Slavery Statement

Pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015, Orion Systems Integrators, LLC (Orion) states we have taken steps during the past fiscal year to identify and minimize the risk of slavery and human trafficking taking place in our supply chain and in our business. This statement is applicable to Orion and all its subsidiaries for the fiscal year ended December 31, 2023.

Our expectations for responsible, ethical and legal conduct are applicable to all parties who work on behalf of Orion, including, but not limited to, our employees, contractors, and other representatives who act on behalf of Orion and to our suppliers. This expectation is a fundamental principle of our business conduct and our commitment to the highest level of integrity, ethics and quality as we support our customers worldwide.

## Organization Structure and Supply Chain

Orion is a privately held, Delaware limited liability company headquartered in Edison, New Jersey. It has whole-owned subsidiaries located in Australia, Bulgaria, Canada, Germany, India, Ireland, Lithuania, Mexico, the Philippines, Romania, Serbia, Singapore, Switzerland, Turkey, the United Kingdom and the United States. Orion along with its subsidiaries provides digital transformation and product development services worldwide.

Orion's services are comprised of proprietary software solutions, professional services, training and support. In its provision of services, Orion employs professionally qualified individuals directly employed by Orion or one of its subsidiaries and also utilizes consultants. Our policies ensure the fair treatment of our people worldwide. Our suppliers are generally headquartered in North America. Orion relies on the ethical conduct and modern slavery policies of our suppliers to ensure the prohibition and minimization of the risk of slavery and human trafficking in our supply chain.

## Modern Slavery and Human Trafficking

Orion is committed to treating all individuals with dignity and respect, ensuring safe working conditions, and conducting environmentally responsible, ethical operations. Our values embody all that we do at Orion and outline our expectations for our people's behavior towards colleagues, customers and suppliers.

We seek to treat all individuals fairly and consistently in an open and trusted environment. Our policies related to the Modern Slavery Act are in line with our culture and values. In the jurisdictions in which we operate, we:

- Follow a robust recruitment process in line with applicable employment laws.
- Ensure all employees meet the ethical conduct and integrity standards for our industry.
- Adhere to employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace.
- Review market-related pay and other compensation annually.
- Provide policies and initiatives to support our employees' physical and mental well-being.

With respect to our supply chain for third party services, Orion relies on the due diligence and review processes of our key suppliers to ensure modern slavery and human trafficking are not present within their supply chains. We generally do not purchase hardware, components or other products in connection with our provision of services to our customers. Orion does not pay cash for services or products.

## **Due Diligence and Management**

Orion manages its potential ongoing risk through appropriate procurement and core business processes. Procurement is from approved suppliers and key supplier performance is regularly monitored. Orion does not wish to be associated with any organization that either has or is found to be involved in either human trafficking or modern slavery. Should Orion become aware that human trafficking or modern slavery were present within the supply chain or our suppliers, Orion would require the supplier to remediate the situation to Orion's satisfaction otherwise the business relationship would be terminated.

## **Key Performance Indicators to Measure Effectiveness of Steps**

To date, we have not identified any instances of modern slavery occurring in our supply chain and therefore it can be difficult to measure the effectiveness of our policies in reducing the risk of modern slavery and human trafficking.

## **Employee Reviews on Modern Slavery**

Orion's expectations for employee conduct are routinely reviewed with employees through our annual review process.

Orion takes responsibility for this Statement and its related objectives and will review and update it in accordance with the Modern Slavery Act.