UK and Australia Joint Modern Slavery Act Statement

E2open Parent Holdings, Inc.'s Joint Disclosures Under The UK Modern Slavery Act and the Australia Modern Slavery Act 2018 for the Fiscal Year 2023 ended February 28, 2023

This statement is made in accordance with the Australian Modern Slavery Act 2018 (“Australian MSA”) and the United Kingdom’s Modern Slavery Act 2015 (“UK MSA”). This statement covers the period 1 March 2022 to 28 February 2023. This Statement is a joint statement made on behalf of the Australian MSA and UK MSA reporting entities. Unless expressly stated otherwise, references to ‘we’, ‘us’, ‘e2open’ and ‘our’ refer to E2open Parent Holdings, Inc. as a whole including the reporting entities listed below and their owned and controlled entities.

This statement specifically covers the following UK and Australian entities: E2open Ltd., Logistyx Technologies International, Ltd., Eagle BJ Holdings Ltd., BluJay Solutions Ltd., BluJay Solutions Holdings, Ltd., Birch Worldwide Ltd., BluJay Solutions Australia Pty Ltd., Expedient Software Pty Ltd., and BluJay Solutions Pty Ltd. All entities listed above are a part of the global e2open group of companies, which are ultimately owned by E2open Parent Holdings, Inc., incorporated in Delaware and listed on the NYSE.

1. Business Structure, Operations, and Supply Chain

Our Structure and Operations

We are a leading provider of cloud-based, end-to-end supply chain management software. Our platform spans many key strategic and operational areas including omni-channel operations, demand sensing, supply planning, global trade management, transportation and logistics and manufacturing and supply management. We generate revenue from the sale of software subscriptions and professional services. In aggregate, we serve approximately 6,000 clients in all major countries in the world across a wide range of end-markets, including consumer goods, food and beverage, manufacturing, retail, technology and transportation, among others.

As of February 28, 2023, we had 4,012 full-time employees and 71 part-time employees with 1,254 in North America, 580 in Europe and 2,249 in Asia-Pacific. E2open’s UK subsidiaries employ approximately 198 individuals while we employ approximately 37 individuals in Australia.

Our Supply Chain

As a SaaS company, we do not have an extensive range of local or international suppliers where modern slavery or human trafficking would generally be a material risk and none of our suppliers are disproportionately key to our businesses’ success.
2. Identifying and Assessing Modern Slavery Risks

Modern slavery is an umbrella term encompassing the risks posed by forced labor, prison labor, indentured labor, bonded labor, debt servitude, state-imposed forced labor and the worst forms of trafficking where coercion, threats or deception are used to intimidate, penalize or deceive workers thereby creating situations of involuntary work and exploitation. Modern slavery may also be associated with the worst forms of child labor. We are committed to identifying and addressing modern slavery risks in both our operations and supply chains.

Risk assessment and due diligence process

E2open has a robust and comprehensive evaluation process for all new suppliers and vendors for compliance with accurate records, anti-corruption and ethical practices, data privacy, conflicts of interest, human rights and fair labor practices, and other standards. Our Ethics and Conduct Policy for e2open suppliers (the “Supplier Code”) explicitly prohibits child labor, forced or slave labor. E2open conducts supplier/vendor attestation annually or bi-annually depending on risk to ensure compliance with a keen focus on data and information security practices.

3. Addressing Modern Slavery Risks

We are committed to addressing modern slavery risks in both our operations and supply chains.

Policies

- The Code of Conduct and Ethics outlines how e2open and its subsidiaries conduct business and describes our most fundamental shared values. It provides our employees guidance on how to follow policies, applicable laws, rules and regulations, as it is vital that all employees act with integrity and in accordance with local laws.
- We partner with our suppliers and set clear expectations in our Supplier Code. We expect our suppliers to establish policies and procedures to ensure compliance with the Supplier Code and all applicable laws and regulations.
- Our Human Rights statement reflects our dedication to the preservation of basic rights and human dignity in our workplace. This includes prohibited behaviors, such as forced labor, human trafficking, and modern slavery. We strongly support internationally recognized human rights principles that promote and protect human rights, and through our solutions help our clients to recognize and preserve human rights within the supply chain.
- E2open has in place a Whistleblower Policy that sets out the process for employees, contractors, vendors or any other interested parties to raise concerns they have in relation to compliance with our legal obligations, including modern slavery and human trafficking, with no retaliation for reporting concerns under the company’s Whistleblower Policy.
E2open conducts the following actions to help prevent forced labor, modern slavery and human trafficking:

1. Global Supplier Code of Conduct Acknowledgement
   a. Our Supplier Code serves as a guide to ethical supplier conduct. The Supplier Code applies to all third party suppliers of products or services that are paid directly by e2open. We ask all suppliers to acknowledge receipt of the Supplier Code, and set the expectation that all supplier personnel assigned to perform services to e2open will comply with the Supplier Code.

2. Supplier Agreements
   a. All suppliers are subject to legal terms and conditions.
   b. Assessments of potential suppliers are completed as part of our supplier on-boarding process. E2open reviews the performance of suppliers based on their relative risk to the company, based on the assessment of cross-functional stakeholders, including the Legal Department. Suppliers deemed highest risk are audited or reviewed on a periodic basis. We work closely with suppliers to develop corrective action plans and carry out all audit findings.
   c. We perform continuous monitoring of suppliers for changes in policies, environments, contracts and processes.
   d. We perform remediation for identified issues or termination of supplier relationship if a supplier refuses remediation measures.

3. Training
   a. E2open conducts annual Code of Conduct training and certification for all employees.
   b. We expect our suppliers to communicate the Supplier Code tenets to their employees and third party partners through training, policy and other messaging.

Governance

As we continue to grow as a company, we have started integrating more ESG principles and practices into our operations, culture, and business strategy through our four P’s: planet, people, platform, and policy. We’ve established a board committee to oversee ESG-related topics, and we’ve created an ESG Steering Committee to lead our ESG efforts, engage with stakeholders, and play an active role in supporting our clients’ ESG goals and objectives.

4. Looking Ahead

Our ESG Steering Committee will continue to review our human rights efforts, as well as best practices in the marketplace, to understand how we can further strengthen our commitments. We continue to invest in new processes to help us have greater visibility of ESG performance of our suppliers.

Approved by the Board of Directors at the direction of the Nominating, Sustainability & Governance Committee of E2open Parent Holdings, Inc. on July 27, 2023.

Jennifer Grafton, General Counsel and Secretary