



## **UK and Australia Joint Modern Slavery Act Statement**

## 1. Reporting Entities

E2open Parent Holdings, Inc.'s Joint Disclosures Under the UK Modern Slavery Act and the Australia Modern Slavery Act 2018 for the Fiscal Year 2025 ended February 28, 2025 ("Reporting Period")

This statement has been prepared by E2open Parent Holdings, Inc. and 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 from March 1, 2024 to February 28, 2025. This Statement is a joint statement made on behalf of the Australian MSA and UK MSA Reporting Entities (defined below). Unless expressly stated otherwise, references to 'we', 'us', 'e2open' and 'our' refers 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 (together the "Reporting Entities"). All Reporting Entities were a part of the global e2open group of companies, which during the Reporting Period, were ultimately owned by E2open Parent Holdings, Inc., a company incorporated in Delaware.

## 2. 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, logistics, 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, 2025, we had 3,885 full-time employees and 55 part-time employees with 1,158 in North America, 488 in Europe and 2,294 in Asia-Pacific. E2open's UK subsidiaries employ approximately 180 individuals while we employ approximately 31 individuals in Australia.

#### Our Supply Chain

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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.

### 3. 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 social and environmental responsibility. As part of our commitment, e2open prohibits slavery, human trafficking, and child labor in our operations and supply chain, and works to minimize any associated risks.

### Risk Assessment and Due Diligence Process

E2open has an evaluation process for all new suppliers and vendors for compliance with recordkeeping, 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.

Given the nature of our business (the supply of cloud-based, end-to-end supply chain management software), the high levels of education required of our staff members, the location and visibility of our operations, and the strength of our corporate policies, the risk of modern slavery occurring in our core operation is low. However, e2open recognizes that there may be modern slavery risks within our supply chains because they are complex, scattered globally and include a wide range of service providers and service organizations.

## 4. Addressing Modern Slavery

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

#### Policies and Procedures

- 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 with 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 vendors that have access to our systems, our data or our customer data ("Material
  Suppliers") to establish policies and procedures to ensure compliance with the Supplier Code
  and all applicable laws and regulations.

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- 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.
  - We have established an ethics hotline, where employees and others can report suspected inappropriate or unethical behavior or human rights abuses, misconduct or violations of our Code of Conduct and Ethics. We engage a third-party vendor to manage the ethics hotline, which permits reporters to maintain their anonymity.
- E2open's legal department promptly investigates any report that may include indications of human rights abuses and contacts the appropriate authorities.

## E2open conducts the following actions to help prevent forced labor, modern slavery and human trafficking:

- 1. Global Supplier Code of Conduct Acknowledgement
  - a. E2open's Supplier Code applies to all Material Suppliers of products or services that are paid directly by e2open. We ask all Material Suppliers to acknowledge receipt of the Supplier Code, and we expect that all supplier personnel assigned to perform services to e2open will comply with the Supplier Code. Our Supplier Code of Conduct affirms that e2open has zero tolerance for child or forced labor and trafficking in persons and requires each Material Supplier to adhere to these principles.

#### 2. Audit

a. 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 the highest risk are audited or reviewed on a periodic basis. We work closely with suppliers to develop corrective action plans when necessary and carry out all audit findings.

#### 3. Training

- a. E2open conducts Code of Conduct training and compliance certification for all employees annually.
- b. Our Supplier Code applies to all Material Suppliers, their employees and third party partners. We expect that its tenets are communicated appropriately.
- 4. Restricted Party Screening
  - a. E2open conducts restricted party screening on subcontractors and vendors to ensure e2open is not doing business with any entities that are flagged for designated human rights abuses or subject to other watch-lists/sanctions.
  - b. We continuously monitor Material Suppliers for changes in policies, environments, contracts and processes.
- 5. Remediation

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- a. If an incident of modern slavery were discovered in our supply chain, e2open would immediately take action. E2open would work with the partner or supplier at issue to remove any confirmed violation of the principles or terminate business with the partner or supplier if the finding was disregarded or continued.
- 6. Consultation with Controlled Entities
  - a. In preparing this statement, we consulted with our Reporting Entities and entities they owned or controlled during the Reporting Period, including those in Australia and the UK, to ensure their input was reflected in the risk assessment and mitigation strategies.

#### <u>Governance</u>

During the Reporting Period, the Nominating, Sustainability, and Governance Committee governed our ESG-related programs, and the ESG Steering Committee led our ESG efforts, engaged with stakeholders, and played an active role in supporting our clients' ESG goals and objectives. As a growing company, we continue to integrate environmental, social, and governance ("ESG") principles and practices into our operations, culture, and business strategy through our four P's: planet, people, platform, and policy.

### 5. Assessing Effectiveness

Our current approach to assessing effectiveness is primarily qualitative. We review supplier acknowledgements of our Supplier Code, consider feedback through our ethics hotline, and monitor the level of awareness raised through employee training. Over time, we intend to introduce more structured metrics to better evaluate the impact of our actions.

## 6. Looking Ahead

Gene Gander, Director

E2open will further focus on training in modern slavery risks and auditing our compliance with this policy to ensure that its importance is embedded in our culture and practices. As our approach to modern slavery auditing matures, e2open will seek enhancements to further automate and digitize supplier engagement. We 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 Directo	ors of E2open Parent Holdings, Inc. on September 17, 2025.
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