

Introduction

This Policy and its associated Statement sets out AlayaCare's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the 2023 calendar year.

As part of the Information and Communication Technology sector, we recognize that we have a responsibility to take a robust approach to slavery and human trafficking, both ourselves and via our supplier networks. We continue to take our responsibility very seriously during the coronavirus pandemic.

AlayaCare fully supports the aims of the Modern Slavery Act 2018 and makes this Statement as a single reporting entity in accordance with Section 13 of the Modern Slavery Act. Our organization is absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This Statement covers the mandatory criteria for reporting as indicated by Section 16 of the Modern Slavery Act.

Organizational Structure

This statement covers the activities of Alaya Care Inc., specifically including AlayaCare ANZ Pty Ltd., its wholly-owned subsidiary and a material business unit of Alaya Care Inc. AlayaCare is the developer of a comprehensive electronic health record platform that primarily serves home care and home health providers. By using AlayaCare's SaaS platform, home care and home health providers can automate processes, including tracking of care provided, scheduling of caregivers and the key billing and financial transactions associated with such services.

As a relatively young company, established just over seven years ago, a large majority of its engineering and software development activities are conducted 'internally'. The same is true for primary customer support activities including carrying out implementation projects and other professional services for customers. Similarly, customer support is not outsourced but rather conducted by AlayaCare employees.

Countries of Operation and Supply

AlayaCare currently operates in Canada, the United States and Australia, with a large majority of development and engineering being conducted in Canada. Australian operations include general management, sales and local support, including software implementation and direct supporting activities for customers.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

Although modern slavery can be found in all countries, there are certain countries associated with a higher risk for modern slavery. These often include countries with large populations of migrant workers, weak labor law enforcement, countries with a common practice of charging workers recruitment fees, or where modern slavery has been well documented over time. According to the Global Slavery Index and indices related to forced labour and migration, AlayaCare does not have any activities or operations in countries assessed as high-risk for modern slavery.

High-Risk Activities

Activities that have been flagged as high risk specific to Australia include forced labour in agricultural, construction, hospitality, meat processing, cleaning, domestic work, and food service industries. Given the limited supply chain currently utilized, and the lack of any manufacturing activities, AlayaCare does not have any activities that it has assessed as high-risk for modern slavery in or associated with its business. Based upon the ICT sector snapshot, AlayaCare will continue to monitor any changes or developments in risk factors.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Our policies communicate our organization's values and standards, making it clear that we do not tolerate any level of human right violation including modern slavery and human trafficking. We are committed to continuously improving our approach to reflect our commitment to acting ethically in all business relationships.
- **Risk assessments:** Assessing and understanding modern slavery risk is a critical step in ensuring that our operations prevent and address the issue. Risk is analyzed by conducting internal analyses and assessments at a global level to identify any potential human rights risk across the entirety of our business operations including key product and service vendors and suppliers.
- **Due diligence:** Our human resources, legal and compliance teams are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. They combine their expertise in hiring, investigations, and all in connection with local laws and regulations relating to Modern Slavery.

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. AlayaCare regularly reviews the policies and identifies areas for improvement to ensure that they are in line with industry best practice.

- **Employee code of business conduct and ethics.** Our code makes clear to employees the actions and behaviour expected of them when representing our organization. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. It is expected that all individuals working for or under AlayaCare comply with the code.
- **Respectful Workplace policy.** Our respectful workplace policy is an extension of our code of conduct and ethics dedicated to ensuring that AlayaCare presents a supportive, respectful, and safe work environment free of bullying, harassment, discrimination, and violence. We are committed to treating our employees, customers, and partners with respect, dignity, and in accordance with all applicable legislation.
- **Product and service vendor/supplier standards.** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers and vendors 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. AlayaCare expects that all vendor and supplier workforce be free from any human rights violations and requires our suppliers to alert our compliance team if they become aware of any instances of unacceptable working conditions in their supply chains.
- **Whistleblowing policy.** We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the vendors and suppliers, our organization. This includes any

circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can submit a confidential complaint form to the appropriate Human Resources Business Partner.

Due Diligence

We undertake due diligence when considering taking on new product and service vendors/ suppliers, as well as during the staffing and training of employee-related processes. Our due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new vendor or supplier
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our code of conduct, including the termination of the business relationship
- verifying that all individuals are eligible to work at AlayaCare and meet all applicable age requirements during the pre-employment screening. AlayaCare follows all applicable wage and labour laws and provides ethics and compliance training as part of the onboarding process of all new employees.

Looking Ahead

We have reviewed our objectives and key results (OKRs). As a result, we have developed a strategy for future improvements including:

- Requiring all employees in Australia to have completed training on modern slavery and human trafficking. Our training will cover the following:
 - How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
 - How to identify the signs of slavery and human trafficking
 - What initial steps should be taken if slavery or human trafficking is suspected
 - How to escalate potential slavery or human trafficking issues to the relevant parties within the organization
 - What external help is available, for example through the Modern Slavery Helpline
 - What messages, business incentives or guidance can be given to suppliers and other business partners to implement anti-slavery policies; and
 - What steps our organization should take if suppliers or vendors do not implement anti-slavery policies in high-risk scenarios, including the termination of the business relationship
- Adding a Modern Slavery section to our Code of Conduct. This section will explain the following:
 - The concept of modern slavery and the principles of the Modern Slavery Act 2018
 - How to identify prevalent risk factors and indicators of modern slavery including geographic risk factors, high risk industries and activities, and suspicious behavior
 - The obligation of all employees, customers, and partners to report acts of actual or suspected modern slavery
- Maintaining a continuous review system of all key product and service vendors and suppliers to ensure practices are compliant with our set standards
- Continuing to conduct due diligence and measure effectiveness of the current approach to minimize modern slavery risk

We recognize that there is more work to be done and we are committing to continuous improvement to minimize risk and prevent modern slavery and human trafficking. AlayaCare expects to implement the new actions within the next 12 months across all operations in Australia.

Board Approval

This Statement and the policies included in it were approved on March 28, 2023 by our Board of Directors, who review and update it annually.

A handwritten signature in blue ink, appearing to read "a. schauer", is positioned above a solid blue horizontal line.

Adrian Schauer
Chairman of the Board of Directors
AlayaCare