

Last updated: June 2024

This statement is made on behalf of Vendavo Holdings, Inc. and its international subsidiaries (“Vendavo”) pursuant to applicable legislation (including but not limited to section 54(1) of the Modern Slavery Act 2015) and constitutes our company’s slavery and human trafficking statement for 2024.

Who We Are and How We Do Business

Vendavo is a leading SaaS company dedicated to helping global manufacturers and distributors accelerate growth and profitability. Our AI price optimization, intelligent CPQ, and rebate management solutions empower our customers to manage, optimize, and digitize their end-to-end commercial processes. At Vendavo we run our business with honesty and integrity and encourage high standards not only from our employees and business but also from our vendors, suppliers and partners. We do not tolerate any type of forced or compulsory labor, human trafficking, or slavery, within our supply chain or operations or any of our corporate activities.

Our Supply Chain

We are a SaaS company with a relatively small supply chain because our people, their expertise, and our intellectual property are our business. Although we engage with suppliers for a range of services such as office space and related services (cleaning, courier services, waste disposal and catering), employee wellness, events and corporate travel, the majority of our suppliers provide us with IT hardware, network services, and software. We also work with a number of sales partners who either operate as our sales agents or with whom we partner to deliver Vendavo software to shared customers.

Relevant Policies

Vendavo maintains clear policies for employees and third parties which address the risks associated with modern slavery.

Anti-Slavery and Human Trafficking Policy: our Code of Conduct states Vendavo’s commitment to human rights and fair labor, and its policy against slavery and human trafficking. A workflow is ongoing to interrogate any areas in our supply chain where there may be a risk of modern slavery and/or human trafficking.

Compliance Reporting Policy: Vendavo encourages its employees, customers, and other business partners to report any concerns related to its direct activities or its wider supply chains.

Employee Handbook: Vendavo’s Employee Handbook is the compass by which directors, officers, employees of Vendavo are expected to conduct themselves. All of the company’s business is to be conducted with the highest standard of integrity and in compliance with all applicable laws and regulations. The Employee Handbook applies to all employees of Vendavo’s companies worldwide.

Minimizing Risk

At Vendavo we evaluate suppliers on risk depending on the type of product or service being supplied, and the country where the service is performed or the product is made. Where a supplier is deemed to be moderate to high risk, Vendavo will require contractual commitments that they have written policies and effective procedures in place to control the risk of modern slavery and

human trafficking down their own supply chain, and will request evidence in high risk situations where identified.

Any supplier considered to be in violation or “at risk” will be notified and given an opportunity to address the risks before Vendavo looks at using an alternative supplier.

Reporting

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all of those working for us. If employees have any concern or suspicion that modern slavery or human trafficking is taking place in any part of our business or supply chain, they are urged to report such concerns pursuant to our internal published, independent and confidential reporting mechanisms.

Board Approval

This statement has been approved by Vendavo Holdings, Inc.’s Board of Directors who will review and update it annually.

The Board of Directors approved this Statement on June 13, 2024.

Duncan James, CEO, June 2024.