



UK Modern Slavery and Human Trafficking Statement

Xactly¹ is committed to ensuring everyone working with and for our organization and supply chain, whether directly or indirectly, is treated with the respect and dignity they inherently deserve, regardless of the geographical location of our entities.

Xactly strives to comply with all applicable laws and regulations, and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct and our corporate Anti-Slavery expressly prohibits the use of involuntary labor in our supply chain and among our employees within our business.

Our selection criteria for suppliers follows a vendor review process, instituted to recognize any potential abuses and violations. As a global company, we purchase services and products all over the world. We take a risk-based approach to performing due diligence on our suppliers, which includes reviewing suppliers doing business in high-risk countries or offering high-risk products or services.

Where we employ the services of contractors locally and offshore, our process is to assess their operations, assess their employees' conditions under normal circumstances and validate the status of internationally recognized ethical standard certifications.

We set standards for our suppliers in the following areas:

- Labor and Employment – We require that ethical employment practices be strictly enforced, including, but not limited to, policies with respect to ethnicity and culture. We further require strict compliance with applicable international and local laws as a basic requirement to enter into a business relationship.
- Environment – We require that the conditions within which employees are working align with applicable international standards and local regulations.
- Third party relationships – We require that suppliers providing us with goods or services provide appropriate evidence of their compliance with internationally recognized standards and applicable local regulations.
- Risk mitigation – We require appropriate assurances that the goods and services we're buying are ethically sought and plans are in place to continue to provide them should the need arise to change supply.
- Anti-corruption – We require appropriate assurances that the supplier is not relying on unethical behavior in the supply chain to enable delivery of the goods or service.

Within our own environments, including our office spaces and home-offices, as well as any instance where our employees act on behalf of the company, we make all possible efforts to maintain a high standard for our employees, including but not limited to:

- offering flexible working hours,
- safe and appropriate workplaces,
- the opportunity to access training and development programs, and
- regular employee performance and remuneration reviews.

We communicate our company values regularly and clearly, to instill in our employees, vendors, suppliers, partners and clients an understanding of our commitment to work towards the eradication

¹ The term "Xactly" refers to Xactly Limited, Xactly Corporation, and its domestic and foreign subsidiaries.



of Human Trafficking and Modern Slavery in our society. We make our expectations clear through our Code of Conduct and employee policies, and we promote Human Trafficking and Modern Slavery awareness to assist in all decision making by our employees worldwide.

Finally, our organizational structure is designed to allow free access to the most senior levels, to ensure any breaches are swiftly reported and acted upon. We have processes in place, including whistleblower mechanisms and free communication channels, to ensure the ability to communicate with our Human Resources, Legal, and Compliance departments, easily, fairly, and without fear of repercussions, to deal with all aspects of employee conduct and decision making.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the 2025 financial year.

Signed by:
Ian O'Neill
Global Head of Legal
March 28, 2025

