



Modern Slavery and Human Trafficking Statement

Financial year: 1 January 2025 – 31 December 2025

Opening statement from senior management

Granicus is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

“Slavery and human trafficking are condemnable practices, and we are committed to conducting business in an ethical manner everywhere we operate. This includes understanding the modern slavery risks that face us and addressing them in our business and supply chains.”

— Mark Hynes, CEO

Structure of the organisation

Granicus-Firmstep Limited is part of the Granicus Group of companies.

Granicus connects governments with the people they serve, providing cloud-based solutions for communications, government website design, meeting and agenda management, records management, and digital services to government agencies across the U.S., U.K., Australia, New Zealand, Canada, and Latin America.

We assess the risk of modern slavery within our own operations and supply chains as low. We do not knowingly engage with any organisation involved in slavery or human trafficking, and we work with a range of suppliers including marketing, accounting, facilities, employee benefits, and IT service providers.

Policies

As part of our commitment to combating modern slavery, we maintain the following policies:

- Code of Business Ethics
- Code of Conduct
- Diversity, Equity & Inclusion Policy

We require our suppliers to be aware of these policies and to adhere to equivalent standards. These documents are developed by our compliance group and reviewed by Human Resources

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and Procurement leadership and are designed to help employees and business partners identify modern slavery risk indicators and raise concerns.

Due diligence

New suppliers are subject to due diligence checks before onboarding. Where issues are identified, we take appropriate measures up to and including termination of the relationship. Our due diligence procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas on an ongoing basis;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistleblowers, including a dedicated web intake form, which is available to employees and, where relevant, supply chain workers.

Risk and compliance

Granicus supplies services to highly regulated public sector customers and is regularly subject to risk assessments and management audits that require us to evaluate our exposure to modern slavery risk. We do not consider that we operate in high-risk sectors or locations: our supply chain is not large or complex, and our suppliers are typically well-established service providers such as cloud service providers, research companies, lawyers, accountants, and other consultants. Where we find evidence of non-compliance with our policies, we will seek to terminate the relevant supplier relationship.

Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking. Mandatory training on preventing and detecting modern slavery is provided to all UK employees and the Executive team via our Learning Management System (LMS), alongside guidance on how to raise complaints internally.

Effectiveness

Mandatory modern slavery training was completed by the substantial majority of in-scope UK employees and the Executive team during the reporting period. Completion is monitored via the LMS, and HR follows up on outstanding completions.

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No concerns relating to modern slavery or human trafficking were raised through our whistleblowing or supplier channels during the reporting period.

We are working to develop more granular performance indicators — including supplier due diligence completion rates and new-joiner training turnaround — for inclusion in future statements.

Further actions

Following review of our actions for this financial year, we intend to take the following further steps:

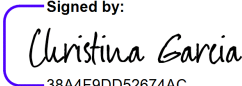
- continue to seek assurances from suppliers that they and their supply chains comply with the Modern Slavery Act 2015 and Human Rights Act 1998;
- undertake periodic review of our policies; and
- monitor the Immigration and Asylum Bill’s proposed reforms to section 54 and prepare to meet its mandatory content, certification, and timing requirements ahead of commencement.

Approval and certification

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Granicus-Firmstep Limited’s slavery and human trafficking statement for the financial year commencing 1 January 2025 and ending 31 December 2025, issued in line with the Board’s approval of the Financial Statements for the year ended 31 December 2025.

This statement was approved by the Board on 17 September 2026

I confirm that, to the best of my knowledge and belief, this statement is accurate.

Signed by:

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Christina Garcia, Director

Granicus-Firmstep Limited

Date: 17 September 2026

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