

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 Haynes, CEO

Structure of the organization

Granicus-Firmstep Limited (which is subject to the Modern Slavery Act 2015) is part of the Granicus Group of companies.

Granicus connects governments with the people they serve by providing the first and only Government Experience Cloud for the public sector. Over 6,000 federal, state and local government agencies and more than 300 million citizen subscribers power an unmatched Subscriber Network that turns government missions into quantifiable results. With comprehensive cloud-based solutions for communications, government website design, meeting and agenda management software, records management, and digital services, Granicus empowers stronger relationships between government and residents across the U.S., U.K., Australia, New Zealand, Canada, and Latin America. By simplifying interactions with residents, while disseminating critical information, Granicus brings governments closer to the people they serve—driving meaningful change for communities around the globe.

Due to the nature of our business, we assess that the risk of modern slavery within our operations and supply chains is low. Nevertheless, we maintain a zero-tolerance approach and remain vigilant, ensuring our recruitment and management processes promote ethical conduct and human rights. We do not knowingly engage with any organisation involved in slavery or human trafficking, and we are committed to fostering a respectful and transparent working environment throughout our activities and business relationships. In order to facilitate the services that we provide, we work with a range of suppliers these include marketing,

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accounting, facilities, employee benefits and IT service providers. We are committed to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our policies as stated below reflect our commitment to acting ethically and with integrity in all our business relationships and our effort in implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place within our supply chain.

Policies

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

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

We also make sure our suppliers are aware of our policies and adhere to the same high standards.

Together these documents help our employees and business partners understand what we mean by modern slavery and labour standards assurance and outline our approach to managing associated risks. They encourage employees and business partners to look for and raise red flags. These policies have been developed by our compliance group and reviewed by the Human Resources and procurement leadership teams.

Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures, new suppliers are subject to due diligence checks. If issues are identified during the due diligence process, appropriate measures are taken.

Our procedures are designed to:

- **establish and assess areas of potential risk in our business and supply chains**
- **monitor potential risk areas in our business and supply chains**

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- **reduce the risk of slavery and human trafficking occurring in our business and supply chains**
- **provide adequate protection for whistleblowers**

Risk and compliance

Granicus supplies services to highly regulated public sector industries and as such Granicus is regularly subjected to risk assessments and management audits that by their nature require Granicus to evaluate its exposure to the risk of modern slavery occurring in its supply chain. Be that as it may, we do not consider that we operate in high-risk sectors or locations because we do not have a large or complicated supply chain and our suppliers are typically valued well-established service providers such as cloud service providers, research companies, lawyers, accountants and other consultants.

If we find evidence of a failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier.

Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. Examples of training courses we have administered over the past year include:

Mandatory training sessions regarding preventing and detecting modern slavery for all employees within the United Kingdom and the Executive team. The training module is available on Granicus' Learning Management System (LMS). In addition, information on how to raise complaints within the company is handed out in conjunction with the training module available on LMS. This means that all Granicus' UK employees and decision-makers are well equipped to make the right decisions and ensure that Granicus does not participate with suppliers who participate in abhorrent acts such as human trafficking and slavery. Finally, the LMS allows for feedback following a module. This allows employees to provide important feedback on the

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effectiveness of the company's training, which assists in ensuring that training regarding the prevention of slavery and human trafficking will continue to be accurate, effective and valuable.

Further actions and sign-off

Following review of our actions at this financial year and in order to prevent slavery or human trafficking from occurring in our business, or supply chains, we intend to take the following further steps to tackle slavery and human trafficking: (i) continue to seek assurances from suppliers that their and their supply chains comply with the Modern Slavery Act 2015, Human Rights Act 1998 and Modern Slavery Act 2018; and (ii) undertake an assessment and review of our policies periodically.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Granicus's slavery and human trafficking statement for the financial year commencing 01/12/2023 and ending 31/12/2024.

This statement was approved by the Board on 26 September 2025



C GARCIA

Director

Granicus-Firmstep Date: 26 September 2025

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