

Sonatype Modern Slavery and Human Trafficking Statement

This statement (the “Statement”) is made on behalf of Sonatype, Inc. and its wholly owned subsidiary Sonatype UK Limited “Sonatype UK”), pursuant to s.54 of the Modern Slavery Act 2015. References in this Statement to “we”, “us”, “our” are references to both Sonatype, Inc. and its wholly owned subsidiary Sonatype UK.

Organisation Structure

Sonatype UK is a limited liability company registered in England and Wales with registered number 10091337. Sonatype UK’s parent is Sonatype, Inc. a Delaware registered company. Sonatype is an international open source software management company comprised of Sonatype, Inc. as the parent company and its affiliates located in the UK, Canada, Australia, Singapore, and Colombia.

Sonatype has zero tolerance for slavery and human trafficking. This statement sets out the steps taken, and that we continue to take, to ensure that modern slavery and human trafficking are not taking place within our business or supply chain.

Risk Assessment

As an open source software management company, we consider the overall risk of modern slavery existing within our business to be low. We do, however, remain alert to the risks 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 Policies

We maintain specific internal policies and programs to ensure that we are conducting business in an ethical and transparent manner. These include our employee code of conduct, our export and sanctions compliance program, as well as our ESG, whistleblowing, and anti-corruption policies.

Our Suppliers

It is important to us that we engage suppliers who comply with all applicable laws in their provision of good and/or services to us. This includes compliance with laws related to human rights, labour rights (including forced labour), child labour, employment, the environment, and anti-corruption.

Our procurement function is currently in the process of augmenting due diligence activities related to new suppliers, taking a risk-based approach depending on the location of the supplier, the type of services being provided, and our overall anticipated spend.

Our aim is to include provisions in our contracts with suppliers:

- requiring the supplier to comply with all applicable laws (including, to the extent applicable, that they have appropriate policies and procedures in place to ensure that there is no slavery or human trafficking within their business or supply chain);
- and permitting us to terminate the contract for breach of the above requirements.

Future plans

Over the next 12 months, we plan to build on our existing policies and procedures by:

- Reviewing the steps taken so far to identify any gaps and consider the effectiveness of our approach.
- Raising awareness of the issues surrounding modern slavery by adding additional information in our employee handbooks.
- Further reviewing our supplier base to identify any particular areas of risk with regards to modern slavery or human trafficking.
- Evaluating opportunities to enhance procurement processes and provide training opportunities to personnel involved in the procurement processes that are focused on the importance of compliance with the above requirements.

This statement has been approved by the Board of Sonatype, Inc. Signature:

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Wayne Jackson

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E. Wayne Jackson, CEO and Member of the Board of Directors