# **522**<sup>®</sup>

Modern Slavery Statement 2024

# INTRODUCTION

The purpose of this statement is to address Seeq Corporation's ("Seeq" or "Company") commitment to minimizing the risk of modern slavery and human trafficking throughout its global operations and supply chain. The statement has been prepared in compliance with the requirements of the Australia Modern Slavery Act 2018, the California Transparency in Supply Chains Act 2010, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, and the United Kingdom Modern Slavery Act 2015.

Seeq is committed to treating our employees and all people who are connected to our business with fundamental dignity and respect. We do not tolerate any form of modern slavery. For the purposes of this Statement, we use the term modern slavery to mean child labor, forced labor, and human trafficking in any form - including slave labor, prison labor, indentured servitude, or bonded labor.

Seeq expects its employees, suppliers, agents, and subcontractors to engage in lawful and ethical business practices, including refraining from slave labor and/or human trafficking. The use of slave labor or human trafficking in the production of Seeq products or products supplied to the Company is unethical, unacceptable, and entirely prohibited. Seeq fully supports global efforts to protect human rights through ethical supply chain management.

This statement describes the actions taken by Seeq during the financial year ended December 31, 2024, and was approved by the Seeq Board of Directors on April 24, 2025.

# **Our Business**

Founded in 2013, Seeq publishes software applications for advanced industrial analytics, AI, and enterprise monitoring and provides those applications in a Software-as-a-Service (SaaS) model. Oil & Gas, Pharmaceutical, Specialty Chemicals, Utility, Renewable Energy and numerous other vertical industries rely on Seeq to harness the power of unused data to generate faster insights and better business outcomes.

Seeq is a privately held virtual company with headquarters located in Seattle, Washington (United States). Seeq has approximately 250 full- and part-time employees worldwide and operations in Africa, Asia-Pacific, Europe, United Kingdom, Latin America, the Middle East, and North America.

We have a successful and accomplished executive team and board of directors with a broad range of experience and expertise in process manufacturing, industrial automation, and enterprise SaaS solutions.

### **Our Governance**

Seeq is committed to embedding respect for human rights throughout our business activities and relationships, including into our policy and governance framework. Seeq's Board of Directors is responsible for the control and direction of Seeq. The full Board regularly reviews reports from management on various aspects of our business, including related risks and strategies for addressing them. While the full Board has overall responsibility for risk oversight, the Board has delegated responsibility for risk management to its Chief Risk Officer (CRO) and Risk & Compliance Manager (RCM).

The CRO and RCM manage Seeq's policies and initiatives relating to corporate social responsibility, including human rights and ethical business practices, and risks related to Seeq's operations and engagement with customers, suppliers, and partners.

# **Our Supply Chain**

Typically, our major suppliers fall into one of the broad categories outlined below:

- Cloud providers who host and process our data and our customers' data processed in our SaaS offerings;
- Third-party consultants (including subcontractors) that we engage for services from time to time related to accounting, auditing, legal counsel, IT applications, security, professional services, event management, marketing; and
- SaaS service providers providing a range of services relating to accounting, travel, employee payroll, quality management, marketing, and customer relationship management.

# **OUR POLICIES**

Our efforts to address the risks of modern slavery across our business and supply chains are anchored in our policies. Our policies convey our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners. We regularly review our policies to identify opportunities for improvement. We monitor evolving international and human rights standards, regulations, and industry best practices so we can continuously improve our own policies to better support our employees and our suppliers.

# **Seeq Values**

At Seeq, we are guided by our values. By living these values as we plan our work, make decisions, interact with others and act, we believe we will positively impact our colleagues, suppliers, customers, shareholders and the broader community.

### Code of Conduct and Ethics

Our Code of Conduct and Ethics (Code of Conduct), associated policies, procedures, training, and communications outline our expectations of our employees. All employees receive training on Business Ethics and related ethics and compliance policies, including our policies relating to a respectful and safe work environment during onboarding, with regular refresher training thereafter.

Seeq provides its employees with several convenient and reliable methods for making suggestions, asking difficult questions, reporting harassment and privacy and code of conduct violations, and raising awareness of potential fraud or other illegal or illicit activities. All methods are completely anonymous unless the reporter chooses to add their name.

- Employees can reach out to anyone in their management chain or the Legal Department with questions about the application of the Code of Conduct or how to approach difficult workplace situations.
- Employees may also make reports online or via phone through the Seeq Whistleblower Hotline, which is managed by an independent third party, and remain anonymous on request. The Whistleblower Hotline is available globally in 150 languages.
- Any employee can submit anonymous suggestions through our Suggestion Ox or file reports about Code of Conduct violations through an online form.

We prohibit retaliation and take all allegations seriously. All suggestions, reports, and complaints are reviewed and/or investigated by Human Resources and any remediation required is tracked and

documented in our HRIS. Employees who violate the Code of Conduct subject to disciplinary action up to and including termination.

# **ASSESSING OUR RISK**

We continually monitor our supply chain to identify partners or vendors that may pose a risk with respect to engaging in illegal activities and Modern Slavery. Generally, our assessment follows a specific number of principles:

- The nature of our business: As our business focuses on the provision of a SaaS platform, we do not manufacture our products and solutions in factories, nor do we engage third parties to perform any such manufacturing on our behalf.
- **Rigor in our human resource processes:** Our human resources processes ensure prior to hiring that those recruited have appropriate authorizations to work and are of legal age for employment.
- Our usage of our outside contractors: Our usage of outside contractors for professional services or non-SaaS services is very limited. We do not consider the Modern Slavery risk in the provision of our professional or other non-SaaS services to be high.
- The nature of our largest vendors: As a SaaS company, our largest vendors typically consist of hosting and related cloud service providers. Our vendors also include providers of online marketing services and various professional services.

# MITIGATING OUR RISK

We aim consistently to deliver progress and expand our work to understand and address any modern slavery risks that may arise in the course of our business.

Seeq has zero tolerance to Modern Slavery. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a rigorous Vendor Review Program. This consists of review and approval of each procured vendor by authorized personnel from each of the teams below:

- Legal
- Finance
- Privacy and Security

We also have a corporate sanction screening program that screens all vendors and suppliers for government sanctions and regulatory and anti-bribery and corruption violations.

### **MEASUREMENT OF SUCCESS**

Seeq believes the success of our anti modern slavery efforts depends on continuous improvement. There is no endpoint where we can stop our efforts to identify and mitigate risks.

We continue to evaluate the extent of any exposure we may have to modern slavery or human trafficking risk in our supply chain. Based on the results of that risk assessment, we will establish appropriate due diligence and auditing procedures with third-party suppliers.

As our business grows, we will scale our ongoing initiatives, priorities and company-wide efforts to address risks posed by modern slavery. Looking to the years ahead, we will continue to strengthen our commitments under these key pillars:

Regularly review and update our policies and assessment processes

- Expand our training and capacity-building efforts
- Regularly review and improve our supply chain due diligence efforts

# **APPROVAL**

This statement is issued by Seeq Corporation, confirming that the statement is in alignment with the understanding of modern slavery risks within the supply chain.

This statement was approved by the Seeq Board of Directors on April 24, 2025

Pete Higgins Chairman