



ARAS CORPORATION MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

PURPOSE

This Modern Slavery and Human Trafficking Statement (“**Statement**”) sets out the actions taken by Aras Corporation and its subsidiaries (collectively, “**Aras**”) to assess and address modern slavery risks in its global operations and supply chain pursuant to applicable laws concerning modern slavery, including but not limited to Section 54 (Transparency in Supply Chains) of the UK Modern Slavery Act 2015.

This Statement constitutes the Aras modern slavery and human trafficking statement for the fiscal year ending December 31, 2023.

This joint statement is prepared and submitted by Aras Corporation on behalf of itself and the following reporting entity which is a wholly owned subsidiary: Aras Software LTD located in the United Kingdom. A joint statement has been prepared because these entities use the same policies and processes, operate in the same sector, and have shared suppliers. This Statement also applies to all other subsidiaries and affiliates that Aras Corporation owns or controls.

Aras is committed to acting ethically and promoting a workplace and supply chain that are free from modern slavery and human trafficking.

OUR BUSINESS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Aras is one of the fastest growing privately held Product Lifecycle Management (PLM) companies. We reinvent, engineer, and manufacture software to empower our customers with the flexibility to overcome tomorrow's challenges today. With our technology, our community, and the way we do business, we are transforming the way the world makes products. Our open, low-code technology enables greater scalability, flexibility, and security for the world's largest enterprises in some of the most innovative industries, including automotive, aerospace and defense, high-tech electronics, medical devices, and industrial manufacturing.

Aras Organizational Structure

Aras Corporation was founded in 2000 and is headquartered in Andover, Massachusetts in the United States. Aras has offices in more than 6 countries with over 700 employees located across the globe.

Aras Operations

We aim to only hire employees that are authorized to work in accordance with applicable employment laws in the country in which they are located. We are committed to respecting human rights in our workplace and have a number of policies and processes in place to promote a safe, diverse, and inclusive workplace.

Aras Supply Chain

Aras supply chain is limited and consists of services procured to operate our business and to enable our employees and partners to deliver our services. Our suppliers are predominantly registered business and professional services organizations, in particular companies that develop and license software or provide cloud-based applications or hosting solutions. Other areas of indirect spending primarily include marketing and other consulting services from third-party providers; travel, hospitality, and food catering services; back-office software services; computers and IT equipment; and general office supplies. The vast majority of our major suppliers are headquartered in low-risk countries.

POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING

Aras takes a global framework approach in combating modern slavery in our operations and supply chain. The following section provides an overview of the policies and processes currently in place, or in the process of implementation in 2024, to facilitate risk assessment, prevention, and mitigation across the globe.



- Aras Code of Conduct and Employee Handbook. The Aras Code of Conduct and Employee Handbook provides our employees with a clear understanding of the high standards for ethical conduct by which we conduct our business globally. Aras requires that all employees of Aras and its subsidiaries and affiliates comply with the Aras Code of Conduct and Employee Handbook as well as with all laws, rules and regulations applicable to Aras where it conducts business. The Code of Conduct and the Employee Handbook also requires Aras employees to deal honestly, ethically, and fairly with its suppliers, customers, competitors, and to ask questions, to seek guidance, to report suspected violations, and to express any concerns regarding compliance. Employees are asked to certify that they understand and will follow the ethical principles and compliance rules outlined in the Code of Conduct and the Employee Handbook.
- Supplier Code of Conduct. To ensure the integrity of supplier relationships across the globe, as part of Aras standard procurement process, Aras will be implementing a Supplier Code of Conduct in 2024. The Supplier Code of Conduct will provide that Aras expects our suppliers to respect its workers' human rights and that child labor, forced labor and human trafficking are strictly forbidden. The Supplier Code of Conduct applies to third parties supplying goods or services to or on behalf of Aras, including staffing agencies and independent contractors.
- Employee Training. Aras annual compliance and ethics training program is also a part of the Aras commitment to maintaining a culture of compliance and ethical business practices in accordance with our policies. Each year, Aras employees around the globe are required to complete compliance and ethics training on a variety of ethics and compliance topics, including training on human rights and modern slavery issues.

DUE DILIGENCE PROCESSES TO IDENTIFY MODERN SLAVERY RISKS

The following section provides an overview of actions taken by Aras, or planned to be implemented in 2024, to assess and address risks in our operations and supply chains.

- Employee Certifications. All Aras employees are required to complete annual Compliance and Ethics Training, which requires all employees to review and re-certify their commitment to Aras Policies.
- Reporting Mechanism. In order to encourage and foster a culture of reporting, Aras maintains a number of policies and reporting channels enabling employees, suppliers and Partners to report potential violations of our standards, including illegal or unethical business practices. Aras policies also prohibit retaliation or other adverse action against those that raise concerns in accordance with these policies. Reporting channels include a global compliance and ethics hotline that is available 24 hours a day, seven days a week and allows for reporting on a confidential or anonymous basis. We continuously monitor these reporting mechanisms. To date, we have received no reports involving complaints of modern slavery risks or incidents via these reporting channels
- Supplier and Business Partner Due Diligence. In implementing the Supplier Code of Conduct planned for 2024, all Aras suppliers and partners are subject to various forms of due diligence, including the verification of information provided to Aras. Additional selective, risk-based due diligence reviews will be performed on both Aras business partners and suppliers.
- Supplier Acknowledgment of Supplier Code of Conduct. In implementing the Supplier Code of Conduct in 2024 as part of our procurement process, Aras suppliers must agree to comply with the Supplier Code of Conduct, or make an equivalent commitment, at the outset of the relationship.

RISK ASSESSMENT AND MANAGEMENT



As a software technology company, Aras believes that it operates within an industry with a low risk of supporting or encountering modern slavery or human trafficking based on the nature of our business, location of our workforce, and the services we provide. Additionally, Aras supply chains are limited. Aras does not manufacture or sell any physical goods and, therefore, we have no supply chain relating to such activities. Aras is not aware of any instance in which a modern slavery concern has been raised with Aras by an Aras employee or third-party in either its business or its supply chains and Aras has not, to date, otherwise identified any instances of modern slavery in either its business or its supply chains.

Notwithstanding our low risk for supporting or encountering modern slavery or human trafficking, we are committed to essential ethical standards and mandates compliance with the laws and regulations in the jurisdictions where we operate and respect the human rights of others.

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS

In future years, Aras will continue to assess the effectiveness of our actions in combating risks of modern slavery, including those policies, standards and due diligence actions outlined above. Aras is always seeking to improve in this area, and it continues to review its human rights efforts, as well as best practices across difference regions, to understand how we can further strengthen our commitment to ensure modern slavery and human trafficking are not taking place within our organization or our supply chain globally. Aras will continue to establish and implement our third-party due diligence processes. We will also continue to monitor our reporting mechanisms (including any reports received through our compliance and ethics hotline) to identify whether any of the reports reflect modern slavery incidents or risks.

TRAINING ON MODERN SLAVERY AND HUMAN TRAFFICKING

Aras provides periodic training to our people on the subject of modern slavery and our policies to address the risks to help increase education and awareness. We plan to continue taking steps to strengthen our commitment to preventing modern slavery and human trafficking and will evaluate further education to be made available to our employees on how to identify signs of human rights violations in their role in upholding our commitment to human rights.

BOARD APPROVAL

This Statement is being published in satisfaction of the statutory obligations under Section 54 of the UK Modern Slavery Act (2015) on behalf of Aras Software LTD, a wholly owned subsidiary of Aras Corporation.

This Statement has been approved by the Board of Directors of Aras Corporation and is effective as of May 17, 2024.

A handwritten signature in blue ink, appearing to read 'Sean Turner', written over a horizontal line.

Sean Turner
Director
Aras Corporation, also on behalf of Aras Software, Ltd.