

## **Modern Slavery and Human Trafficking Statement**

Teradata (UK) Limited (“Teradata”) makes this statement in accordance with the provisions of the Modern Slavery Act 2015.

Teradata is committed to acting ethically, with integrity and transparency in our business dealings and relationships. Teradata views slavery and human trafficking as gross abuses of human rights and is committed to implementing and enforcing systems and controls to help ensure they do not occur anywhere in Teradata’s own business or in that of our supply chains.

### **Who we are**

Teradata (UK) Limited is the UK indirect subsidiary of Teradata Corporation. Teradata Corporation is listed on the New York Stock Exchange and is the parent of a worldwide group of companies that provides analytic data platforms, software applications and related consulting, maintenance, and support services. Teradata Corporation has its head office in the United States of America. The Teradata group employs, directly and indirectly, approximately 7000 employees worldwide. Whilst this statement applies solely to Teradata (UK) Limited, the principles, policies and practices referred to within this statement are applicable to the entire Teradata group of companies.

Teradata is proud that each year since 2010, and most recently in 2023, the Ethisphere Institute has designated Teradata one of the “World’s Most Ethical Companies”. We also have been recognized by listings on Dow-Jones Sustainability Indices, which include, amongst other things, consideration of listed-companies’ ethical, compliant, and sustainable employment and supply chain practices.

### **What we do**

Teradata is a leading connected multi-cloud data platform for enterprise analytics, focused on helping companies leverage all their data across an enterprise, at scale. We help our customers use analytics to derive business value from diverse data types, integrate and simplify their data and analytics ecosystem, and streamline access and management of data. Our target market focuses on organisations that are among the world's most demanding, large-scale users of data.

Our specific solutions and services include:

- **Business Analytics Solutions**: analytics that unleash the breakthrough value hidden in your data
- **Ecosystem Architecture Consulting**: expertise to design and deliver the right architecture to advance the business
- **Hybrid Cloud Solutions**: tailored cloud strategies and deployment plans that put analytics everywhere it needs to be

We are data strategists and data scientists, technologists, innovators, and experts in all types of analytics. We engage directly with business and IT leaders to solve urgent real-world problems and seize compelling strategic opportunities. We combine proven analytics expertise, specialized business consulting, and scalable, high-performance, analytics

ecosystems. Teradata's agile analytical ecosystems solutions are market-leading and award-winning.

#### **Our values**

As set forth in our Code of Conduct, Teradata strives to demonstrate responsibility in all aspects of our business endeavours. We are committed to the communities where we work and live. Our desired behaviours include ethics, respect, and accountability. Our Code of Conduct commitments include that we conduct business ethically and in compliance with our Code of Conduct and Policies, we respect others, and we comply with laws. These values, qualities and commitments, combined with our policies, practices and actions described above, purposely are intended to foster a corporate culture of ethics, compliance and integrity in everything Teradata and Teradata employees do in connection with our business – to do the right things, always – including with respect to avoiding and trying to help eliminate modern slavery and human trafficking.

#### **Our operations**

Teradata offers three main services to our customers: cloud and hardware-based data warehousing, business analytics, and consulting services. Those services are delivered by a combination of employees and contractors based around the United Kingdom. We maintain a physical office in London and engage approximately 200 employees around the country. Our workforce is primarily composed of IT and other professionals and our activities are largely the supply of professional services and computer hardware and software to United Kingdom business clients.

#### **Our supply chain**

We acquire a range of goods and services from suppliers in the United Kingdom and internationally. Categories of goods and services acquired from our local suppliers included recruitment, office operating expenses and utilities, IT hardware and software, motor vehicle and transportation, professional services, and events, training, and sponsorships. The goods and services we acquired from international suppliers are digital marketing, unstructured data management, software, data analytics, data intelligence platform, software, IT recruitment, IT solutions, hotels, and education.

We also acquire goods from other members of the Teradata corporate group (all of which are subject to the same procurement standards outlined in this statement). The goods acquired from other Teradata entities are primarily computer hardware and software, which is in turn acquired from suppliers such as Dell and FLEX.

## **WHAT WE HAVE DONE TO ASSESS AND ADDRESS MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN DURING 2022: OUR HUMAN RIGHTS AND DUE DILIGENCE INFRASTRUCTURE**

### **Our policies**

Teradata is committed to treating all its employees worldwide with respect and dignity. We strive to provide a workplace that is free from violence and discrimination. Employees are required to comply with Teradata's Code of Conduct (see <http://www.teradata.com/about-us/code-of-conduct>). Teradata requires that it, its subsidiaries, and its employees (as well as its suppliers and business partners) comply with all applicable local employment and human rights laws, routinely exceeding national minimum wage legislation, where such applies. Where Teradata procures temporary/supplementary personnel via staffing agencies, we require such agencies to adhere to the same principles.

The Teradata Code of Conduct includes provisions requiring compliance with our employment policies, employment laws, labour rights and human rights, including the principles of the UN Global Compact and the Responsible Business Alliance Code of Conduct.

Our global policies prohibit harassment, discrimination, workplace violence (including threats of violence), illegal conduct and criminal conduct. These policies promote diversity, inclusion, and freedom of association/expression (such as with respect to workers' council and diversity-based business resource groups), and provide an internal dispute resolution mechanism to address employee grievances.

Human rights violations may be fostered and concealed by bribery, corruption, and false/inaccurate books-and-records entries. In connection with such, Teradata has a strong zero-tolerance policy regarding bribery, corruption and falsification of books-and-records (see [http://assets.teradata.com/pdf/Teradata\\_Anti-Bribery\\_and\\_Anti\\_Corruption\\_Policy.pdf](http://assets.teradata.com/pdf/Teradata_Anti-Bribery_and_Anti_Corruption_Policy.pdf)).

Modern slavery and human trafficking also can be connected with pornography, prostitution and adult-sexually-oriented entertainment. As such, Teradata policies prohibit the use of any Teradata resources in connection with such and prohibit any company-related entertainment, activities, and spending in connection with such. To help assure compliance with respect to these areas, Teradata regularly blocks, audits, monitors, analyses, and places heightened internal controls with respect to bribery, corruption, books-and-records, pornography, and entertainment compliance.

Our global Conflict Minerals Policy also prohibits Teradata Corporation, its subsidiaries and its employees and suppliers from utilizing conflict minerals (including gold, tin, tantalum, and tungsten) sourced from forced labour, child labour, slavery or violence in the region of the Democratic Republic of the Congo (DRC) or an adjoining country, or those who perpetrate or support such human rights abuses. That policy includes the following statements: "Teradata opposes and condemns DRC Conflict Perpetrators, their perpetrating conduct, and the adverse consequences that conduct imposes on the people and environment of the DRC Region. Teradata supports goals, laws, and initiatives that effectively (1) respect and protect human rights and the environment, (2) foster supply chain integrity, ethics, compliance, accountability, and sustainability, and (3) oppose, condemn, stop, eliminate, reduce, isolate,

identify, and penalize DRC Conflict Perpetrators.” See our Conflict Minerals Policy at [https://assets.teradata.com/pdf/Corporate/Teradata\\_Conflict\\_Minerals\\_Policy.pdf](https://assets.teradata.com/pdf/Corporate/Teradata_Conflict_Minerals_Policy.pdf)

Teradata is a signatory to the UN Women’s Empowerment Principles (the WEP). The WEP includes, among other things, commitments to treating all people fairly at work – respect and support human rights and non-discrimination; and ensure the health, safety and well-being of all women and men workers.

Anyone, including all Teradata employees, has access to the Teradata Ethics Helpline, allowing Code of Conduct, policy, and other ethics and compliance questions to be raised, and violations or suspected violations of such or the law to be reported, with options to do so on an anonymous and/or confidential basis. As a matter of policy, Teradata will not retaliate against an employee because he/she raised such a concern or in good faith reported an actual or suspected violation of our Code of Conduct, policies, or the law.

In addition to taking preventative and defensive measures to help avoid, reduce, and eliminate modern slavery and human trafficking, Teradata and its employees take affirmative actions in many countries across the globe to improve human conditions and reduce or eliminate circumstances that might foster or give rise to oppression, suffering, human rights violations, modern slavery, and human trafficking.

#### **Our suppliers**

Teradata maintains a dedicated procurement and supplier management team. Prior to being registered in our procurement systems, Teradata’s suppliers are subjected to due-diligence-screening and risk-assessments, and those who advance are required to meet or exceed the standards of the Teradata Code of Conduct for Suppliers and/or the Teradata Code of Conduct for Business Partners. The standards in these supplier and business partner codes include: (1) the Teradata Code of Conduct; (2) the principles of the UN Global Compact; (3) the principles of the Responsible Business Alliance Code of Conduct; (4) the Teradata Conflict Minerals Policy; (5) laws and Teradata policies regarding anti-bribery, anti-corruption and trade compliance (e.g., the Teradata Anti-Bribery and Anti-Corruption Policy); and (6) laws and Teradata policies regarding privacy and data protection (e.g., the Teradata Privacy Policy). Teradata maintains where possible a contractual right to audit the activities of its suppliers and business partners so that these matters may be effectively monitored.

All Teradata-branded production hardware is sourced solely from one contract-manufacturer (also commonly referred to as an electronics-manufacturing-services (EMS) supplier), FLEX LTD. FLEX is a founding and active member of the Responsible Business Alliance, maintains its own anti-trafficking/anti-slavery initiatives and publishes its own slavery and human trafficking statement. In its statement, FLEX describes the measures it takes to help assure that its upstream suppliers comply with FLEX and Responsible Business Alliance Code of Conduct requirements pertaining to human rights, slavery, and human trafficking.

Teradata’s agreements with FLEX require compliance with laws, labour standards and conflict minerals requirements, and Teradata regularly communicates with FLEX regarding, and monitors FLEX’s compliance with, FLEX’s agreements and obligations with respect to the supply chain for Teradata-branded hardware.

In addition, Teradata communicates and works closely with FLEX with respect to applying strong human rights, anti-slavery and anti-trafficking requirements, practices, controls, and validations regarding DRC conflict minerals. Both are participating members of the Responsible Minerals Initiative and apply internationally recognized processes and standards to help assure that DRC conflict minerals derived from forced labour, child labour, violence, threats of violence, slavery and human trafficking are not included in Teradata-branded hardware by Teradata, FLEX, or upstream suppliers. Teradata publishes an annual Conflict Minerals Report that describes its initiatives, processes, due diligence and progress with respect to helping make sure that Teradata-branded hardware does not include DRC conflict minerals derived from derived from forced labour, child labour, violence, threats of violence, slavery and human trafficking derived from forced labour, child labour, violence, threats of violence, slavery and human trafficking. FLEX does the same in its Specialised Disclosure Report.

In short, Teradata demands that its suppliers, including and through its sole-source contract-manufacturer for Teradata-branded hardware, adhere to the same high standards of ethics and integrity as Teradata itself and if suppliers/partners fall short of those standards, the relationship shall be avoided in the first place or ended if the relationship already has been put into place.

#### Our governance

Teradata implements, adheres to and is, where applicable, a signatory of the following policies, principles, and codes of conduct, which can be accessed by anyone on our Corporate Governance page:

- ❖ [Teradata Code of Conduct](#)
- ❖ **Teradata Code of Conduct for Suppliers**
- ❖ **Teradata Code of Conduct for Business Partners**
- ❖ [UN Global Compact Principles](#)
- ❖ [Responsible Business Alliance](#)
- ❖ **Teradata Anti-Bribery and Anti-Corruption Policy**
- ❖ [Teradata Conflict Minerals Policy](#)
- ❖ [Teradata Conflict Minerals Report](#)
- ❖ [Teradata Environmental, Social and Governance Report](#)
- ❖ Teradata is a signatory to the UN Global Compact, in respect of which we have achieved the “GC Advanced” designation for our annual Communication on Progress (COP). The UN Global Compact includes ten principles in the areas of human rights, labour, the environment and anti-corruption. By adopting the principles of, and becoming a signatory to, the UN Global Compact, Teradata embraces, supports and

enacts, throughout our sphere of influence, a set of core commitments in the areas of human rights, labour standards, environment, and anti-corruption. Our Environmental, Social and Governance Report constitutes our annual UN Global Compact COP and further details our commitment in this regard).

In addition to the foregoing, Teradata seeks always to comply with all applicable laws and regulations in all the countries in which we do business

Teradata has a compliance team, led by the global Chief Ethics, Compliance & Privacy (E&C) Officer and the global E&C Office (which is part of our global Law Department), which also includes close involvement of the following departments at the corporate-group level and the applicable regional and country levels:

- Legal
- Internal Audit, Controller and Enterprise Risk Management
- Security
- Human Resources
- Procurement, Supply-Chain Management & Operations

The Teradata E&C process, charter and reporting/governance model are established by written corporate management policies, which, amongst other things, provides for establishing, communicating, training, certifications, establishing and operating the Teradata Ethics Helpline, monitoring, detecting, addressing, investigating, risk-assessing, implementing controls, implementing preventative actions, implementing mitigation actions, implementing disciplinary/corrective actions, senior management reporting and oversight, Board of Directors Audit Committee reporting and oversight - regarding compliance requirements and practices. The Board of Directors Audit Committee charter also expressly provides oversight of Teradata E&C initiatives. Many aspects and further details of E&C governance at Teradata are described in the aforementioned (and linked) Teradata Code of Conduct and Teradata Environmental, Social and Governance Report. Governance and compliance with respect to human rights, labour rights, anti-slavery, anti-human trafficking, anti-bribery/anti-corruption, compliance, and controls policies are dealt with as part of and in accordance with that E&C governance model.

The chief legal counsel for a region serves as the E&C officer for the corresponding region, and Law Department personnel in various countries serve as E&C deputies. As applied in the UK context at Teradata, our Chief Counsel for EMEA serves as the E&C officer for that region and therefore the UK. He reports directly to the global Chief Legal Officer of the Teradata corporate group and, with respect to E&C-related matters, indirectly with the global Chief E&C Officer (who is based in the UK). He and members of his Law Department team also provide assistance with UK-specific policies, compliance, enforcement and legal guidance, advice and services, including with regard to the UK Modern Slavery Act.

With respect to certain policy/compliance areas, particularized supplemental governance models may apply. For example, with respect to Conflict Minerals (which includes human rights, anti-slavery and anti-human-trafficking considerations and objectives) the aforementioned (and linked) Teradata Conflict Minerals Policy establishes and provides the charter for the Teradata Conflict Minerals Management Committee for conflict minerals oversight, reporting and compliance, as well as linkage to dealing with violations/non-compliance through Teradata E&C processes. Such also is described in the aforementioned (and linked) Teradata Conflict Minerals Report at its Section 5.

#### **Our training**

All Teradata employees are required to undertake compulsory ethics and compliance training and to certify annually that they have undertaken such training and will comply with Teradata's Code of Conduct. The scope and extent of such training is described further in the aforementioned (and linked) Teradata Environmental, Social and Governance Report. Human and Labour rights, anti-slavery/trafficking, anti-harassment/discrimination/bullying, anti-bribery/corruption, UN Global Compact principles, Responsible Business Alliance Code of Conduct principles, conflict minerals, supplier code of conduct, supplier due diligence and heightened duties of Teradata managers, amongst other things, have been included in such training over the past several years. Recently, the Code training for the 2022 cycle re-emphasised anti-bribery/corruption, conflicts of interest, and reporting misconduct.

#### **HOW WE WILL MEASURE THE EFFECTIVENESS OF OUR ACTIONS TO IDENTIFY AND COMBAT MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN**

Teradata has not detected, encountered, or received reports of any E&C matters since 2007, when Teradata Corporation became an independent publicly traded company, which involve a violation of slavery, human-trafficking, or conflict minerals laws/regulations. We intend to continue to hone our initiatives, policies, processes, and vigilance regarding compliance with respect to these areas and E&C, improve them as opportunities arise and maintain a track-record of compliance with slavery, human-trafficking and conflict minerals laws, regulations, and requirements.

## APPROVAL OF THIS STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Teradata (UK) Limited's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2022.

Signed by Jose Garces, Director, Teradata (UK) Limited

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